

Temu | Privacy Policy

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This Privacy Policy describes how Whaleco Technology Limited, an Irish registered company ("Temu", "we", "us" or "our") handles personal information that we collect through our digital properties that link to this Privacy Policy, including our website (www.temu.com), Temu's mobile application (collectively, the "Service"), and other activities as described in this Privacy Policy. At Temu, we care deeply about privacy. We strive to be transparent about our privacy practices, including how we treat your personal information. This Privacy Policy explains how we collect, use, share, and otherwise process the personal information of users in connection with our Service.

What Information Do We Collect?

In the course of providing and improving our products and services, we collect your personal information for the purposes described in this Privacy Notice. The following are the types of personal information that we collect:

Information that you provide

When you create an account, place an order at checkout, contact us directly, or otherwise use the Service, you may provide some or all of the following information:

- **Account and Profile.** In order to create and manage your Temu account, we may collect your mobile phone number or email address as the login credentials for your account. If you choose to sign up or login in via external third-party services, such as Facebook or Google, you agree we may collect your profile photo, username, and email address associated with the relevant third-party service provider. We also collect your account settings and preferences.
- **Purchases.** In order to complete transactions and fulfill orders, we collect data related to your order on the Service (e.g. transaction history), payment information required to complete the transaction (e.g. payment card number or other third-party payment information required for payment), your shipping address (e.g. city, state, country of residence, postal code), and recipient contact information (e.g. name, mobile phone number).

- **Customer Support Activity.** When you communicate with our customer service team through customer support functions, social media, or any other means, we will collect your communication history with us as an ongoing effort to improve customer service and support.
- **User-generated Content.** Such as profile pictures, photos, images, videos, audio, comments, questions, messages, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata.
- **Promotion and Event Participation.** We collect information that you actively share when you participate in a contest, promotion, or survey, such as contact information provided when you enter a sweepstakes, contest, or giveaway through the Service. We do this to notify you of a win, to verify your identity, and/or to send you a prize. In some cases, we may require additional information as part of the participation process, such as your desired prize selection. Such sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstake and contest that you enter. In addition, we collect information about your preferences for receiving marketing communications from us as well as your interactions with them.
- **Other data not explicitly listed here.** We will use other data that you provide as described in this Privacy Policy or for any other purpose disclosed to you at the time we collect your information.

Information from third-party sources

We may combine the personal information that we receive from you with personal information that we obtain from other third-party sources, such as:

- **Data providers.** Such as information services and data licensors that provide demographic and other information, which among other purposes help us detect fraud.
- **Our affiliate partners.** Such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- **Public sources.** Such as government agencies, public records, and other publicly available sources.
- **Marketing partners.** Such as joint marketing partners and event co-sponsors.
- **Other Third-Party Services:** We may obtain your information from other third-party services, such as:
 - **Social media services** - from which we may collect information such as your username, profile picture, and email address associated with the relevant third-party service provider, if you choose to register or log in on the Service using said third-party service.
 - **Logistics service providers** - to effectively complete order fulfillment, we will obtain your logistics information from logistics providers, such as delivery progress and delivery address.

Information collected automatically

To enhance your experience with our services and support the other purposes for which we collect personal information, we, our service providers, and our business partners may automatically record information about you, your computer, or mobile device and your interactions with the Service, our communications, and other online services over time, such as:

- **Device Data:** We collect certain information about the device you use to access the Service, such as device model, operating system information, language settings, unique identifiers (including identifiers used for advertising purposes).
- **Service Usage Information:** We collect information about your interactions with the Service, including the pages you view, the duration on a page, the source from which you arrived at the page, your interactions with the page, whether you opened our emails, and whether you clicked the links within our emails.
- **Location Data:** We collect your approximate location data (e.g. IP address).

Cookies and Similar Technologies: We use cookies and similar technologies to measure and analyze how you use the Service, including the pages you view and how you interact with the content. Cookies and similar technologies are also used to enhance your experience with the Service, improve the Service, display advertisements to you, and measure the effectiveness of advertising and other content. We and our partners also use cookies to promote the Service on other websites. Web beacons are very small images or pieces of data embedded in an image, also known as "pixel tags" or "clear GIFs", that recognize cookies, the time and date the page was viewed, a description of the page on which the pixel tag was placed, and similar information from your computer or device. Some of these tools may enable us or third parties to collect information about how you act with our and other websites over time. To learn how to disable certain cookies, please read our Cookie and Similar Technologies Policy.

How and Why We Use Your Information

We use the personal information that we collect for various purposes, including to develop, improve, support, and provide the Service, allowing you to use its features while fulfilling and enforcing our Terms of Use. We may use your personal information for the following purposes:

Create and maintain your account. We use your personal information to create and maintain your user profile on the Service, enable the Service's account security features (e.g. sending security codes via email or SMS).

Orders and delivery of products and services. We use your personal information to receive and process orders, deliver products and services, process payments, and communicate with you regarding orders, products and services, and promotional offers.

Improve and optimize services and troubleshooting. We use your personal information to optimize features, analyze performance metrics, fix errors, and improve the Service and our business. As part of these activities, we may create aggregated or otherwise deidentified data based on the personal information we collect.

Deidentified information. We may deidentify your information such that it cannot reasonably be used to infer information about you or otherwise be linked to you, and we may use such deidentified information for any purpose. To the extent we possess or process any deidentified information, we will maintain and use such information in deidentified form and not attempt to re-identify the information, except solely for the purpose of determining whether our deidentification process satisfies legal requirements.

Personalize your experience. We use your personal information to recommend features, products, and services that may be of interest to you. Personal information will also be used to determine your preferences and personalize your experience with the Service.

Communicate with you and provide customer support. We use your personal information to communicate with you (e.g. announcements, updates, security alerts, support, and administrative messages) and provide customer support for your requests, questions, and feedback.

Sweepstakes, contests, and other promotions and events. We may use your user profile picture and account information to identify you in related promotions and events, and facilitate your invitations to friends who you want to invite to join the Service.

Marketing. We and our service providers may collect and use your personal

information for marketing purposes. We may send you direct marketing communications (including email, SMS, whatsapp and push notification) and abandoned cart reminders (enabled as described via the use of cookies that we collect). You may opt out of our marketing communications or abandoned cart reminders as described in the “Your Controls and Choices” section below.

Interest-based advertising. We, our service providers, and our third-party advertising partners may collect and use your personal information for interest-based advertising purposes. In providing interest-based advertising, we follow the Self-Regulatory Principles for Online Behavioral Advertising as set forth by the Digital Advertising Alliance (DAA), which is an advocacy organization for responsible digital marketing and consumer privacy. You can learn more about interest-based advertising and your opt-out choices [here](#).**Fraud prevention and security.** We use your personal information to prevent, detect, investigate, and respond to fraud, unauthorized access to or use of the Service, violations of the Terms of Use and Policies, or other misconduct.**Compliance and legal obligations:** We may use your personal information for compliance purposes and to comply with the applicable law, laws, lawful requests, and legal processes (e.g. responding to subpoenas or requests from government authorities); to protect our, yours, and other users' rights, privacy, safety, or property (including introducing and defending legal claims); audit internal processes to ensure compliance with legal and contractual requirements and our internal policies; enforce the terms and conditions that govern the Service; prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activities, including cyberattacks and identity theft.**Legal claims based on your consent.** In some cases, we may specifically ask for your consent to collect, use, or share your personal information, where required by applicable law.**Cookies and similar technologies for technical operations, performance enhancement, advertising, analytics, etc.** For more information about cookies and how we use them, please read our [Cookie and Similar Technologies Policy](#).

How and Why We Share Your Information

At Temu, we care deeply about privacy. While Temu shares your personal information for the purposes of targeted advertising, which may be considered a “sale” under applicable privacy laws, Temu does not “sell” personal information in the traditional sense. We may share your personal information with the following parties for the purpose of providing you with better services, providing you with personalized advertising and marketing communications, protecting your rights, and/or complying with legal requirements:**Affiliates.** For the purpose of order fulfillment, we may share your personal information related to order fulfillment, such as shipping address, contact information, with Whaleco Inc.'s subsidiaries and affiliates. Other unrelated personal information will not be shared. These subsidiaries and affiliates either follow the same practices described in this Privacy Policy or follow practices at least as protective as those described in this Privacy Policy.**Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, order fulfillment and delivery, marketing, consumer research and website analytics). We generally require these service providers to use personal information only as necessary to perform the services or comply with applicable legal obligations.**Payment processors.** Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors.**Advertising and analytics partners.** Third-party advertising, marketing, and analytics companies for the interest-based advertising and analytics purposes described in our [Cookie and Similar Technologies Policy](#). Certain of these disclosures to third parties are known as “sharing” or processing your personal information for targeted ads and but

“sharing” may be considered “selling” your personal information under applicable law. For additional information and to learn about your right to opt out of such practices, see the [Your Controls and Choices](#) section, and the Cookie and Similar Technologies Policy. Third parties designated by you. We may share your personal data with third parties where you have instructed us or provided your consent to do so. We may share the personal information required for the services you request with third parties designated by you. Please be aware that when you use third-party sites or services, their own terms and privacy policies will govern your use of those sites or services. Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you. Professional advisors, authorities, and regulators. We may share your information with our professional advisors (e.g. lawyers, auditors, bankers and insurers), in response to legal processes (such as those issued by courts or authorities in your country of residence); and with other parties in order to enforce our agreements or policies, protect the rights, property and safety of Temu, users and others, and to detect, prevent and address actual or suspected fraud, violations of Temu's Terms of Use, other illegal activities, security issues or when it's required by law. Business transferees. Acquirers and other relevant participants in business transactions (or negotiations of or due diligence for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale, or other disposition of all or any portion of the business or assets of, or equity interests in, Whaleco or our affiliates (including, in connection with a bankruptcy or similar proceedings). Merchandise Partners/Other Users. We may share with the merchandise partners the product reviews you leave, the return or refund reasons you request a return or refund, and customization information for customized/personalized items. The merchandise partner will not receive your payment information or your contact information.

Please note that, in using our Services, you may share personal information to others; for example, when other users view items on Temu, they may see item reviews you left. They will not see your profile photo and name if you hide your profile photo and name when leaving reviews.

The above parties may be located in a country outside of your jurisdiction, including in U.S. and the countries in which the merchandise partners or users may be located. Unless we have your consent, or an exception under the applicable laws apply, we will only share or disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the applicable laws in relation to your personal information.

Your Controls and Choices

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information. In accordance with applicable law, your controls and choices may include: Rights to access, delete, and correct your personal information. You may have the right to access, delete, or correct your personal information. You could delete your account in the “settings” section of the app. Opt-out from Marketing Communications. To manage your preferences or opt-out of marketing communications, you can take any of the following actions:

- **Email Promotional Offers:** If you do not want to receive emails from us regarding special promotions or offers, you may follow the unsubscribe options at the bottom of each email.
- **Mobile Promotional Offers:** When you provide us with your mobile phone number for marketing purposes, we may send you certain marketing alerts via text message and standard data and messaging rates will apply. If you no longer wish to receive mobile marketing alerts from us, you can follow the instructions provided in these messages or reply "stop" to any alerts we send. Rest assured that you can continue to use Temu even if you stop authorizing Mobile promotional offers.
- **Push notifications:** You may receive push notifications when you use the mobile app. If you wish to adjust push notification settings, including turning them off, you may do so in your mobile device's notification settings.

Change settings for cookies and similar technologies. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit <http://www.allaboutcookies.org>. You can also configure your device to prevent images from loading to prevent web beacons from functioning.

Links to Third-Party Platforms. The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. If you choose to connect to the Service through your social media account or another third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. However, please note that these links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. Moreover, we do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. Therefore, we encourage you to read the privacy policies of the other websites, mobile applications and online services you use. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other Choices. Please see the Cookie and Similar Technologies Policy for additional choices and rights you may have and how to exercise such choices and rights.

Children

Temu does not sell products for purchase by children. We sell children's products for purchase by adults. If you are under 18, you may use our Services only with the involvement of a parent or guardian. We do not knowingly collect personal data from users who are under the age of 15 through the Service. If we become aware that we have unintentionally collected personal data from a child under the age of 15 through the Service, we will promptly delete the information from our records. If you believe that a child under the age of 15 may have provided us with personal data, contact us as specified in the "Contact Us" section of this Privacy Policy.

Data Security and Retention

The security of your personal information is important to us. We use technical and administrative measures to help protect your personal information from loss, theft, misuse, unauthorized access, disclosure, alteration, and/or destruction. We also follow the Payment Card Industry Data Security Standard (“PCI-DSS”) in handling your credit card information. However, security risk is inherent in all internet and information technologies. We generally retain personal information to fulfill the purposes for which we collected it, as well as for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing. Data of Temu users in Australia will be stored by default in the infrastructure of Microsoft Azure or a similar cloud service provider. Temu is a global one-stop shopping destination, therefore where necessary, Temu may transfer data related to order fulfillment to service providers in other countries to provide order fulfillment and logistics services. Sensitive personal information (such as account and profile information) unrelated to fulfillment services will not be transferred. At the same time, in all cases, we will ensure that all transfers of personal data comply with applicable legal requirements.

Access and correction

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change. If you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information. To advise us of any changes to or make requests regarding your personal information, you can contact us using the details below.

Complaints

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled. You may make a complaint about privacy using the contact details set out below. If you are not satisfied with our response to your complaint, or you consider that we may have breached our privacy obligations, if you are based in Australia, a complaint may be made to the Office of the Australian Information Commissioner via their website www.oaic.gov.au.

Changes to the Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy, posting

it on the Service and/or providing any notice required by applicable laws. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). We recommend that you review the Privacy Policy each time you visit our Service to stay informed of our privacy practices.

Contact Us

If you have any questions or comments about our Privacy Policy or the terms mentioned, you may contact us at any time:

- Send an email to Temu's Data Protection Office - privacy@temu.com
- Whaleco Technology Limited., First Floor, 25 St, Stephens Green, Dublin 2, Ireland