

Temu I Data Access Portal Privacy Policy

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This Temu Data Access Portal Privacy Policy (the “Privacy Policy”) describes how Temu (“we”, “us” or “our”) handles personal information that we collect from current and prospective researchers requesting access to data in accordance with [Temu Data Access Terms of Use](#) (“Researchers” or “you”) through our [Portal for Researchers](#) (“Portal”).

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 your personal information in connection with our Portal.

Whaleco Technology Limited, an Irish company, is the controller responsible for your personal information.

For the purpose of this Privacy Policy, personal information shall have the meaning of “Personal Data” as referred to in the General Data Protection Regulation (“GDPR”), i.e. meaning any information that relates to an identified or identifiable natural person (the “Data Subject”).

What Information Do We Collect

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

Information that you provide

When you create an account, contact us directly, or otherwise use the Portal, you provide some

or all of the following information:

- Your data access request. We collect the information you provide on the [intake form](#) when you submit your data access request.
- Related interactions. We collect any information you provide when communicating with us in connection with your data access request, including when you ask us something about our Portal.
- Your account. We collect information about your use of your account on the Portal in connection with your data access request.

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:

- Not for profit bodies, organizations and associations with which you are affiliated. Such as the research institution with which you are affiliated.
- Public sources, public authorities, and other parties. Such as government agencies, public records, and other publicly available sources.
- Other third-party services. We may obtain your information from other third-party service providers for purposes as described in this Privacy Policy

Information collected automatically

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

- Device data. We collect certain information about the device you use to access the Portal, such as device model, operating system information, language settings, unique identifiers.
- Portal usage information. We collect information about your interactions with the Portal, including the time you spend on various parts of the Portal.
- Location data. We collect your approximate location data (e.g., IP address).

Cookies and similar technologies

We use cookies and similar technologies to operate and provide the Portal, including to enable your login to your Temu account; to display the page you view; to measure and analyze how you use the Portal, including your language setting, time zone, the content and features you view and how you interact with the Portal; and to detect fraud and mitigate risks. Cookies and similar technologies are also used to enhance your experience with the Portal and improve the Portal. 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 to collect information about how you act with our websites over time.

How and Why We Use Your Information

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

Assess your data access request. We will review your request and decide whether it is in accordance with the Temu Data Access Terms of Use and applicable law. We may verify the information you provide in your request through third-party sources, such as your institution's website or your account and profile associated with your request.

Monitor your use of the Portal, as well as access and use of the data. We may verify that you are complying with what you stated in your data access request, the Temu Data Access Terms of Use, and applicable law.

Create, maintain, and manage your account. We use your personal information to create and maintain your account on the Portal, enable the Portal's account security features (e.g., sending security codes via email or SMS), and facilitate your invitations to persons who you want to invite to assist you in managing your account on the Portal.

Verify your identity and protect our business. We use your personal information to verify your identity and prevent fraud on our Portal in order to protect our customers and our business.

Improve and optimize the Portal and troubleshooting. We use your personal information to optimize features, analyze performance metrics, fix errors, and improve the Portal 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.

Communicate with you. We may communicate with you about your access request. For example, if we need more information or clarification, we will contact you.

Fraud prevention and security. We use your personal information to prevent, detect, investigate, and respond to fraud, unauthorized access to or use of the Portal, violations of the Temu Data Access 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 laws, including any applicable laws, lawful requests, and legal processes (e.g., responding to subpoenas or requests from government authorities); to protect

our, your, and other users' rights, privacy, safety, or property (including introducing and defending legal claims); to audit internal processes to ensure compliance with applicable laws and contractual requirements and our internal policies; to enforce the terms and conditions that govern the Portal; to prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activities, including cyberattacks and identity theft.

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 laws.

Cookies and similar technologies for technical operations, performance enhancement, etc. We use cookies and similar technologies to operate and provide the Portal, including to enable your login to your Temu account, to display the page you view, to measure and analyze how you use the Portal, and to detect fraud and mitigate risks.

Legal Basis

Applicable data protection laws require a legal basis for our use of personal information. Our basis varies depending on the specific purpose for which we use personal information. We use:

- Performance of a contract: when we provide our Portal, or communicate with you about it. This includes when we use your personal information to develop, improve, support, and provide the Portal, allowing you to use its features while fulfilling and enforcing our Temu Data Access Terms of Use.
- Our legitimate business interests and the interests of third parties and/or our customers: when we optimize features, analyze performance metrics, fix errors, and improve the Portal and our business, when we detect and prevent fraud and abuse in order to protect the security of our customers, ourselves, or others.
- Your consent: when we ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing your data for that purpose.
- Compliance with a legal obligation: when we 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) associated with your country of residence; 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 Portal; prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activities, including cyberattacks and identity theft.

How and Why We Share Your Information

At Temu, we care deeply about privacy. We may share your personal information with the following parties for the purposes listed above:

Affiliates. For the purpose of providing Portal, detecting irregular activities and

safeguarding our affiliates, other users or the safety of the public, we may share your personal information such as contact information with our subsidiaries and affiliates. 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.

Portal providers. Third parties that provide services on our behalf or help us operate the Portal or our business (such as for information technology, identity verification, email/SMS delivery, security and user support). We generally require these service providers to use personal information only as necessary to perform their services or comply with applicable legal obligations.

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 (e.g., responding to subpoenas or requests from law enforcement requests); 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 Data Access 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, us or our affiliates (including, in connection with a bankruptcy or similar proceedings).

Not-for-profit bodies, organisations and associations with which you are affiliated. We may share personal information regarding your account and use of the Portal with the not-for-profit bodies, organisations and associations with which you are affiliated and their employees and representatives.

Your Rights and Choices

You have the following rights which you may exercise in accordance with applicable law through the contact details mentioned in the "Contact Us" section:

Right to access. You have the right to obtain from the controller confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, access to the Personal Data and certain information about the processing.

Right to erasure. You have the right to request that we delete Personal Data we maintain about you without undue delay if and to the extent that the Personal Data are no longer necessary in relation to the purposes for which they were processed, you have withdrawn your consent on which the processing is based and where there is no other legal ground for the processing. In addition, deletion will be conducted if you object to the processing and there are no overriding legitimate grounds for the processing, the Personal Data have been unlawfully processed, or the Personal Data has to be erased for compliance with a legal obligation in the EU or Member State to which we are subject.

Right to rectification. You have the right to request that we correct inaccurate personal data we maintain about you.

Right to restriction of processing. You have the right to request that we restrict the processing of your Personal Data in any of the following circumstances: (i) if the Personal Data is inaccurate, its processing may be restricted for the period of time it takes for us to verify its accuracy; (ii) if the processing is unlawful and you object to your Personal Data being deleted you can instead request that its processing be restricted; (iii) if we no longer need the Personal Data but you require us to retain it in order for you to bring, or defend against, a legal claim; (iv) if you have objected to our processing of your Personal Data on the basis of legitimate interest and you are awaiting the conclusion of our legitimate interest assessment.

Right to data portability. You have the right to request that we provide the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format. This applies where the processing is based on consent or contractual necessity and the processing is carried out by automated means. Also, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Right to object. You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal data concerning you, including profiling, which is based on a task carried out in the public interest or on a legitimate interest. We will no longer process the personal data in case of such objection unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Right to withdraw consent. The right to withdraw your consent at any time, where processing is based on your consent. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Right to object to/opt-out of automated decision making. You have the right not to be subject to a decision when it is based on automated processing (i.e., an operation that is performed without any human intervention), if it produces a legal effect (i.e., impacts your legal rights) or significantly affects you in a similar way (e.g., significantly affects your financial circumstances or ability to access essential goods or services), or to opt out of the processing of your Personal data for such purposes. Temu does not make decisions based solely on automated processing that produce a legal effect or that similarly significantly affect individuals.

Right to lodge a complaint with a supervisory authority. You have the right to lodge a complaint with our EU lead supervisory authority, the Irish Data Protection Commission, the UK Information Commissioner's Office for individuals in the UK, the Federal Data Protection and Information Commissioner for individuals in Switzerland, or your local supervisory authority.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to erase information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR/UK GDPR and in relevant local implementing legislation.

You may exercise any of these rights by submitting a request to partner@eur temu.com dedicated to data subject requests or by contacting us using the information provided below. We will not discriminate against you for exercising any of these rights. In certain

circumstances, we will need to collect additional information from you to verify your identity, before providing a substantive response to the request. You can also designate an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.

Links to third-party platforms. The Portal 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. 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.

Children

To use our Portal, you should be at least 18 years old. Our Portal is not intended for individuals under the age of 18.

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. 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 or as disclosed to you at the point of collection, as well as for the purposes of satisfying any applicable 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 Portal users will be stored by default in the infrastructure of cloud service providers. As a global one-stop shopping destination, Temu may need to engage service providers in other countries and share your personal information with them for purposes such as providing the Portal. At the same time, in all cases, we will ensure that all transfers of personal information comply with applicable legal requirements.

Our Global Operations and Data Transfers

To support our global operations:

- We may disclose your personal information to subsidiaries, affiliates, service providers, partners, systems, and other parties located outside your jurisdiction.
- See the “How and Why we Share Your Information” section above for more information about the reasons for our disclosures, which include complying with applicable laws and legal process and providing you with the Portal.

The recipients of personal information may be located in jurisdictions that do not afford the same protections as those afforded in your jurisdiction. We require recipients of personal information to commit to processing information in compliance with applicable privacy laws and to implementing appropriate security measures to protect your information (such as by entering into contractual arrangements).

For example, when we transfer information outside of the EEA, we take steps to confirm that it benefits from an adequate level of data protection by relying on:

- Adequacy decisions. These are decisions from the European Commission under Article 45 GDPR (or equivalent decisions under other laws) which recognize that a country offers an adequate level of data protection. We transfer your personal information as described in “What Information Do We Collect” to some countries with adequacy decisions, such as the countries listed [here](#); or
- Standard contractual clauses. The European Commission has approved contractual clauses under Article 46 of the GDPR that allow companies in the EEA to transfer data outside the EEA. These (and their approved equivalent for the UK and Switzerland) are called standard contractual clauses. We rely on standard contractual clauses to transfer personal information as described in “What Information Do We Collect” to certain affiliates and third parties in countries without an adequacy decision.

In certain situations, we rely on derogations provided for under the applicable law to transfer information to a third country.

Click the link to learn more about [Adequacy decisions](#) (or equivalent links under applicable laws) or [Standard contractual clauses](#) (or equivalent links under applicable laws).

We store the information described in the “What Information Do We Collect” section in servers located in the EEA.

Conflict

If there is any inconsistency between Temu Partner Platform’s Privacy Policy and this Privacy

Policy, this Privacy Policy shall prevail to the extent they relate to the use of the Portal.

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 Portal 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 Portal to stay informed of our privacy practices.

Contact Us

If you have any questions or comments about our Privacy Policy or the terms mentioned, or if you wish to contact our Data Protection Officer by email, please send an email to partner@eur.temu.com.

If you wish to contact our Data Protection Officer by post, please send mail to the following address of Temu's Data Protection Officer - Whaleco Technology Limited., First Floor, 25 St, Stephens Green, Dublin 2, Ireland