

Temu I Partner Platform Privacy Policy

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This Temu Partner Platform Privacy Policy (the “Privacy Policy”) describes how Temu (“we”, “us” or “our”) handles personal information that we collect from current and prospective Partners (i) who are using the Temu Partner Platform as an individual, or (ii) where a Partner is a company or similar entity, and the Temu Partner Platform is used by its employees, representatives, or other individuals authorized by that Partner (“you”) through our digital properties that link to this Privacy Policy, including but not limited to our website (<https://partner.temu.com>, <https://partner-eu.temu.com>), related services (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 your personal information in connection with our Service. If you are governed by certain specific jurisdictions, please see the “[Additional Terms for Certain Jurisdictions](#)” section for additional information. If you are a California resident, please see the “[Additional Terms for Certain Jurisdictions - California](#)” section for additional information.

Different Temu entities handle your personal information based on your location as follows:

- If you are located in the European Economic Area (“EEA”), UK, Switzerland, Whaleco Technology Limited, an Irish company is the controller responsible for your personal information.

- If you are located in the United States, Whaleco Inc. is responsible for the processing of your personal information.
- If you are located in Canada, Whaleco Canada Inc. is responsible for the processing of your personal information.
- If you are not located in the EEA, UK, Switzerland, United States, or Canada, Elementary Innovation Pte. Ltd., a Singapore company is responsible for the processing of your personal information.

What Information We Collect

In the course of providing and improving our services, 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 Service, you provide some or all of the following information:

- **Account and profile.** In order for you to create and manage a Temu account (including when you are acting as the representative), we may collect your mobile phone number or email address as the login credentials for your account. You may also be required to provide information, including your name, phone number, email address, demographic information (e.g., your country of citizenship), corporate documents and information associated with your accounts (e.g., legal name, registered address, country/region, employer identification number/registration number, business scope, business description), your government-issued ID and identity documents (e.g., passport or driver's license), and information contained on these documents (e.g., identification number and expiry date).
- **Payment information.** In order for you to make a payment or receive a payment when using Temu Services, we collect tax information and data related to your payment card information and bank information (e.g., card number, phone number, and billing address).
- **Transactional information.** In order to complete transactions and fulfil your requests, we collect data related to your transaction details associated with your account, and information about refunds and complaints.

- **User support activity.** We collect communication history between you and us through user support functions, or any other means, to assist in providing support, and to facilitate and enhance user support activity.
- **Your 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 promotion or survey.
- **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 identity verification providers and data licensors that provide demographic and other information, which among other purposes help us verify identity and detect fraud.
- **Marketing partners.** Such as joint marketing partners and event co-sponsors.
- **Public sources, public authorities, and other parties.** Such as government agencies, public records, other publicly available sources, and sellers or others providing information about transactions or claims they may have.
- **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 services 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 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.
- **Service usage information.** We collect information about your interactions with the Service, including the content you view, the features you use, the applications you provide or support, and the time you spend on various parts of the Service.
- **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 Service, including to enable your login to your Temu account; to display the page you view; to measure and analyze how you use the Service, including your language setting, time zone, the content and features you view and how you interact with the Service; and to detect fraud and mitigate risks. Cookies and similar technologies are also used to enhance your experience with the Service and improve the Service. 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.

Block 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 www.allaboutcookies.org.

How and Why We Use Your Information

We use your personal information that we collect for various purposes, including to verify your identity, to develop, improve, support, and provide the Service, allowing you to use its features while enforcing our [Temu Partner Platform Terms](#). We may use your personal information for the following purposes:

Create, maintain, and manage your account. We use your personal information to create and maintain your account on the Service, enable the Service’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 Service.

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

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

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

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 [Temu Partner Platform Terms](#) 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 Service; 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 Service, including to enable your login to your Temu account, to display the page you view, to measure and analyze how you use the Service, and to detect fraud and mitigate risks.

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 purpose of verifying your identity, providing you with better services, communicating with you, protecting your rights, protecting our rights, protecting the rights of Temu sellers, and/or complying with applicable legal requirements:

Affiliates. For the purpose of providing services, 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.

Service providers. Third parties that provide services on our behalf or help us operate the Service 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.

Payment processors. We may share your personal information that may identify you with our payment processors to assist you in the registration and certification of the payment service providers as described in our agreements. We may share your payment card information and bank information with our payment processors to make or receive a payment when you are using the Service.

Third parties designated by you. We may share your personal information 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 may 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 (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 Partner Platform Terms](#), 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).

Your business. We may share personal information regarding your account and use of the Services with your business and its employees and representatives to enable your business to manage the account and access to our Services.

Other users/sellers. Your partner application details and service information may be made available to other users and the public.

Your Controls/Rights 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/rights 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 in addition to other rights under applicable laws. Please see the Additional Terms for Certain Jurisdictions for more information.

Withdrawal of consent. Where we process your personal information based on consent, you may withdraw your consent at any time by contacting us at partner@temu.com.

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. 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.

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 Additional Terms for Certain Jurisdictions for additional choices and rights you may have and how to exercise such choices and rights.

Children

To use our Services, you should be at least 18 years old. Our Services are 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. 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 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 Temu users will be stored by default in the infrastructure of Microsoft Azure or a similar cloud service provider. 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 Services. 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 or outside the EU, EEA, UK and Switzerland.
- See the "How and Why we Share Your Information" section above for more information about the reasons for our disclosures, which include supporting our

operations, complying with applicable laws and legal process, and providing you with services.

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 EU, EEA, UK and Switzerland, 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 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 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).

Additional Terms for Certain Jurisdictions

Certain jurisdictions have additional terms described below under applicable laws. If you are located in any jurisdiction set out below, the additional terms outlined below apply to you in addition to the other terms of this Privacy Policy. In case of any conflicts between the other terms of this Privacy Policy and the applicable additional terms described below, the terms described below shall govern.

- [Australia](#)
- [California](#)
- [Canada](#)
- [European Economic Area, UK, Switzerland](#)
- [India](#)
- [Mexico](#)
- [New Zealand](#)
- [Saudi Arabia](#)
- [South Korea](#)
- [Turkey](#)
- [Vietnam](#)

Australia

Your Australian Privacy Rights

If you are located in Australia, you have the following rights in respect of your personal information that we hold:

- **The Right to Access Information.** You may request access to personal information that we hold about you.
- **The Right to Correct Information.** You may request the correction of your personal information if it is inaccurate, out-of-date, incomplete, irrelevant or misleading.

You can ask for access or correction of your personal information by contacting us at partner@temu.com.

If you have any queries or complaints about this Privacy Policy or our processing of personal information, please contact us in writing. If you are dissatisfied with the outcome of the complaint or the way in which the complaint was handled, then you may contact the Office of the Australian Information Commissioner.

California

For purposes of this section, “Personal Information” has the meaning given in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”), as well as the meaning given to “personal data” under other US state privacy laws. Unless otherwise specified, Personal Information

includes “sensitive personal information” as defined by the CCPA and “sensitive data” as defined by other US state privacy laws.

If you are a California resident, this section provides more details on how we collect, use and disclose Personal Information of California residents in operating our business, and their rights with respect to that Personal Information.

We collect the following categories of Personal Information:

- Identifiers, such as your name, contact information, and device identifiers;
- Demographic information, such as your country of citizenship;
- Transactions (such as order details and transaction history) that you perform on Temu;
- Information about your interactions with and use of Temu;
- General geolocation information;
- Information about your company;
- Inferences about you based on the other information we collect; and
- Sensitive personal information, such as government identification numbers, login credentials, and financial account information.

We collect such information for the purposes described below, which may include:

- Creating and maintaining your account;
- Verifying your identity and preventing fraud;
- Processing orders, payments, and delivery;
- Improving, optimizing, and maintaining our services;
- Communicating with you;
- Administering promotions;
- Deidentifying information;
- Maintaining the security of our platform; and
- Legal compliance, complying with legal requests and investigations as we deem reasonable, and protecting the rights of you, us, and others.

We have not in the last twelve (12) months sold or shared Personal Information about you as defined by the CCPA. We do not knowingly collect or disclose the Personal Information of anyone under the age of 18.

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.

Temu does not use or disclose sensitive personal information for purposes other than those expressly permitted under the CCPA. We process government identifiers for identity verification, fraud prevention and legal compliance purposes, and we process login credentials and financial account information to securely log in, process orders, and enforce our agreements or policies. Additionally, we do not attempt to re-identify deidentified information that was derived from Personal Information, unless expressly permitted by applicable laws.

As a California resident, you may have the rights listed below in relation to Personal Information that we have collected about you. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

Right to know / access. The right to request information about the categories of Personal Information we collect, the categories of sources from which we collect it, the purposes for which we process it, the categories of third parties to whom we disclose it, and the specific pieces of Personal Information Temu has collected about you.

Right to delete. The right to request that we delete Personal Information we maintain about you.

Right to correct. The right to request that we correct inaccurate Personal Information we maintain about you.

You may exercise any of these rights by submitting a request to partner@temu.com. We will not discriminate against you for exercising any of these rights. We may need to collect information from you to verify your identity, before providing a substantive response to the request. You may 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 showing that you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.

Canada

We will collect, use and disclose your personal information subject to your consent, unless otherwise allowed or required by law. When we rely on your consent as the legal basis for processing your personal information, you have the right to withdraw it at any time. However, this withdrawal will not affect the legality of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain products or services. We will inform you if this is the case when you withdraw your consent.

Children. We do not knowingly collect personal information from anyone under the age of 14 (“child” or “children”). If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from children without verification of parental consent, we will take steps to delete that information as required by applicable law.

Comments and Questions. If you have any questions or comments about this Privacy Policy, your personal information, or to exercise one of your legal rights in relation to that personal information, please communicate with our Data Protection Officer by email at privacy@temu.com.

European Economic Area, UK, Switzerland

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”) and UK GDPR, i.e. meaning any information that relates to an identified or identifiable natural person (the “Data Subject”).

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

Your Rights as a Data Subject

You have the following rights which can be exercised in accordance with applicable law:

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.

Other Choices. Please see the [Partner Platform Cookie Policy](#) for additional choices and rights you may have and how to exercise such choices and rights

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 Services, or communicate with you about them. This includes when we use your personal information to develop, improve, support, and provide the Service, allowing you to use its features while fulfilling and enforcing our [Temu Partner Platform Terms](#).
- **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 Service 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 Service; prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activities, including cyberattacks and identity theft.

- **These and other legal bases:** depending on the purpose we described in the “How and Why We Use Your Information”

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

India

If you are a resident of India:

Grievance Redressal

If you have any concerns or questions in relation to the processing of your personal information under this Privacy Policy you have the right to contact the Grievance Officer by sending an email to partner@temu.com.

Mexico

Data Controller

The Mexican data controller is Elementary Innovation Pte. Ltd., having its registered office at 6 RAFFLES QUAY, #14-06, SINGAPORE 048580.

Sensitive Information

We do not intend to process sensitive information. If we process sensitive information in the future, we will ask for your consent to do so.

All purposes described in this Privacy Policy are primary purposes.

Rights

If you are a Mexican resident, you have the following rights:

Rights to access, delete, and correct your personal information and to object to the processing of your personal information. You have the right to access, delete, correct your personal information, and to object to the processing of your personal information.

Limit the use and disclosure of your personal information. You have the right to limit the use and disclosure of your personal information.

To exercise these rights, you or your legal representative must send a written request addressed to the privacy department to the address: partner@temu.com, clearly indicating the right being exercised as well as the following information:

- Your full name;
- Your address or e-mail address to which a response can be sent;
- Documents proving the identity or authorization to represent the data owner (if the request is submitted through a representative);
- Description of the personal data on which you intend to exercise any of the abovementioned rights; and
- Any other element that facilitates the location of the personal data.

In the event that the information provided is wrong or insufficient, or the corresponding accreditation documents are not attached, we may require you to provide the necessary elements or documents to process the request.

Additional Information on Transfers

We do not need your consent for sharing your information with affiliates, services providers, payment processors, professional advisors, authorities and regulators or with your business and its employees.

We need your consent for sharing your information with business and marketing partners, business transferees and with other users or sellers. By accepting this privacy notice we will understand that you have given us consent for these transfers except if you opt out by emailing us as below.

Email us at partner@temu.com if you do not wish your information to be shared with business and marketing partners, business transferees, or with other users or sellers.

New Zealand

If you are a New Zealand resident:

- **Correction Statement:** when requesting correction of your personal information, you have the right, to provide to us a statement of the correction sought (the “Correction Statement”) and request that, if we do not make the correction you have sought, the Correction Statement is attached to the relevant personal information.

Saudi Arabia

Consent

By registering or using the Temu Partner Platform, you understand that you are consenting to the practices described in this Privacy Policy.

Legal Basis

Our legal basis for processing personal information depends on the specific purpose for which we use personal information.

- **Performance of a contract:** when we provide our Service, or communicate with you about them. This includes when we use your personal information to develop, improve, support, and provide the Service, allowing you to use its features while fulfilling and enforcing our [Temu Partner Platform Terms](#).
- **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 Service 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, your, and other users' rights, privacy, safety, or property (including introducing and defending legal claims); to audit internal processes to ensure compliance with legal and contractual requirements and our internal policies; to enforce the terms and conditions that govern the Service; to prevent, identify, investigate, and deter fraudulent, harmful, unauthorized, unethical, or illegal activities, including cyberattacks and identity theft.
- **These and other legal bases:** depending on the purpose we described in the “How and Why We Use Your Information”

Your Statutory Rights

Subject to any statutory limitations, you have rights in relation to the personal data that we hold about you.

Right to be informed. You have the right to be informed of the purpose(s) and legal basis for collecting your personal data;

Right to withdraw consent. You have the right to withdraw your consent to our processing of your personal data at any time (please note, however, that we may still be entitled to process your personal data if we have another legitimate reason other than consent for doing so);

Right to data portability. You have the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible (though please note that this right only applies to personal data which you have provided to us);

Right to rectification. You have the right to have any incorrect data rectified and, taking into account the purposes of the processing, to have incomplete personal data completed;

Right to erasure. You have the right to request that we erase your personal data in certain circumstances (though please note that there may be circumstances where you ask us to erase your personal data, but we are legally entitled to retain it);

Right of access. You have the right to request access to your personal data processed by us and a copy of this data; and

Right to lodge a complaint. You have the right to lodge a complaint with your data protection authority or with us in writing if you think that we have breached any of our obligations or infringed your rights under applicable privacy law.

You can exercise your rights by contacting us using the details set out in the “Contact Us” section below. We will respond to complaints in writing within a reasonable time. We will provide details regarding your applicable data protection authority upon request. We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your information.

Data Retention

We will keep your personal data for as long as it is necessary for the purpose for which they were collected. Thereafter, pursuant to applicable laws, we will delete your data in line with our general erasure procedures unless: (i) we retain your personal data after anonymization thereof in accordance with local law requirements; (ii) we are otherwise required to retain your personal data to comply with applicable law; (iii) there are outstanding claims or complaints that will reasonably require your personal data to be retained.

South Korea

What Information We Collect

All personal information collected from the Republic of Korea ("Korea") is stored in and processed directly on our server located in the United States and Ireland. We collect personal information listed in this Privacy Policy with your consent, based on Articles 15 (1) 1 and 22 (1) 7 of the Personal Information Protection Act ("PIPA").

Delegation of Personal Information Processing

We delegate processing of personal information to third-party companies, enabling us to perform our contractual obligations and offer efficient services to you. In the case of delegation of personal information processing to third-party companies located overseas, personal information is transferred pursuant to Article 28-8 (1) 3 of the PIPA. Delegation of personal information processing include:

Category	Recipient	Country	Date and Method of transfer	Particulars of Personal Information transferred	Recipient's Purpose of Use	Period of Retention and Use
Cloud Server	Microsoft Azure (MsKoreaprivacy@generalagent.co.kr)	U.S.	Transfer over secure network when personal information is required for business purpose	Data collected during user usage	Data storage, system development and operation	Destroyed upon termination of contract
		Ireland				
Email	Sendgrid (privacy@twilio.com)	U.S.		Email	Email dispatch	

Overseas transfer is necessary for the provision of our Service, so if you refuse the overseas transfer, you will not be able to use the Service. If you wish to refuse overseas transfer of personal information, please delete your account or contact our customer service center.

Additional Use or Provision of Personal Information

Temu uses and provides personal information solely within the scope with your consent. Pursuant to Articles 15(3) and 17(4) of the PIPA, we may use or provide personal information within a scope reasonably related to the initial purpose of the collection without your consent, taking into the following considerations:

- Whether the additional use/provision is related to the initial purpose of the collection;
- Whether the additional use/provision is foreseeable in light of the circumstances under which personal information was collected and practices regarding processing;
- Whether the additional use/provision unfairly infringe on your interests; and
- Whether the necessary security measures such as pseudonymization or encryption were taken.

In determining whether to additionally use or provide personal information, we will carefully and comprehensively consider various factors, including the applicable laws and regulations such as the PIPA, the purpose of use and provision of personal information, the method of use and provision of personal information, items of personal information to be used and provided, details of consent provided by you or matters notified to or disclosed to you, impact of use and provision of personal information on you, and measures taken to protect your personal information.

Data Retention

Temu will retain the personal information for as long as we provide the service to the Partners in accordance with the [Temu Partner Platform Terms](#), and take action to destroy within 90 days upon the Partner's request to terminate the Temu service and delete the Partner's account; provided that Temu may retain such personal information for a specific period as prescribed by the applicable laws, for example, 3 months for website visit history as prescribed by the Protection of Communications Secrets Act.

The procedure for and methods of destroying personal information are as follows:

- Procedure of Destruction: Once the purpose of personal information collection and use has been achieved, the information is separately stored and then destroyed after retaining for a certain period of time pursuant to internal policies and applicable laws.
- Methods of Destruction: Personal information in electronic form is destroyed through means that will make the data irrecoverable, whereas personal information stored in a hard copy format is destroyed using a shredder.

Your Rights

You may exercise your rights related to your personal information, such as requesting access, modification or deletion, suspension of processing, or objecting to or requesting an explanation on an automated decision concerning your personal information pursuant

to applicable law. You may also exercise your right of withdrawal of consent to the collection/use/provision of your personal information. To exercise your rights, you may contact us at our dedicated **Contact us (Last Section)**.

Children

In Korea, to register an account on Temu as Partner, you must be at least 19 years old. Our services are not intended for individuals under the age of 19. We also do not knowingly collect or disclose the personal information of anyone under the age of 19.

Privacy Office and Domestic Agent

Temu provides information on the privacy office and domestic agent in accordance with the PIPA and Act on Promotion of Information and Communications Network Utilization and Information Protection as follows.

- **Department in charge of protecting personal information and handling related complaints**

Data Protection Office

Email: partner@temu.com

- **Domestic agent**

General Agent Co., Ltd. (Representative: Eun Mi Kim)

Address: 1216 Platinum Building, 28, Saemunan-ro 5ga-gil, Jongno-gu, Seoul, Republic of Korea

Phone number: (02) 736-8110

Email: temu@generalagent.co.kr

Turkey

For the purpose of this Privacy Policy, personal information shall have the meaning of “personal data” as referred to in the Turkish Data Protection Law No. 6698.

Legal Basis

The legal basis for the processing and transfer of your personal data (including personal data collected through cookies and similar technologies) provided above is as follows:

- **Performance of a contract.** when we provide our Services, or communicate with you about them. This includes when we use your personal data to develop, improve,

support, and provide the Service, allowing you to use its features while fulfilling and enforcing our [Temu Partner Platform Terms](#).

- **Our legitimate business interests and the interests of third parties and/or our customers.** when we optimize features, analyse performance metrics, fix errors, and improve the Service 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 data for a specific purpose that we communicate to you. When you consent to our processing your personal data for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.
- **Compliance with a legal obligation and establishment, use or protection of a right.** when we use your personal data 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, your, 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, unauthorised, unethical, or illegal activities, including cyberattacks and identity theft.

Cookies and Similar Technologies

Please see [Partner Platform Cookie Policy](#) for further details on cookies and similar technologies.

Your Rights

Pursuant to Article 11 of the Turkish Data Protection Law No. 6698, in respect of your personal data processed by Temu, and to the extent Temu is processing your personal data as a data controller, you have the right:

- a. to learn whether any of your personal data is subject to processing;
- b. to request information regarding the processing activities;
- c. to learn the purposes of the processing and whether or not it is used for the purposes intended;
- d. to know the third parties within or outside the country, to whom your personal data are transferred;
- e. to request correction of incomplete or inaccurate personal data;

- f. to request deletion or destruction of your personal data under the conditions set forth in Article 7 of the Turkish Data Protection Law No. 6698;
- g. to ask for notification to the third parties to whom your personal data have been transferred about the correction, deletion and/or destruction of your personal data pursuant to the above-mentioned clauses (e) and (f);
- h. to object to negative consequences which arise as a result of the analysis of your personal data processed solely by automatic means; and
- i. to request indemnification if you suffer damage as a result of illegal processing of your personal data.

To exercise your rights, you may contact us at our dedicated **Contact us** (Last Section). We endeavor to resolve your requests as soon as possible according to the nature of your request and in any case, within thirty days - as required by Turkish Data Protection Law No. 6698.

Vietnam

In limited circumstances, certain information we collect may be considered sensitive personal data under Vietnamese laws, such as location data (e.g., IP address) and information appearing on your ID documents (e.g., photo of your face) although we do not extract any identifier template(s) from this data.

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 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

For non-EEA/UK/Switzerland residents, if you have any questions or comments about our Privacy Policy or the terms mentioned, please send an email - partner@temu.com.

[Spanish Version](#)

[Korean Version](#)

[Turkey Version](#)