

Taming Temu: why the fast-growing online marketplace fails to comply with the EU Digital Services Act

ANNEX

- 1. Temu Digital Services Act (DSA) Help Page..... 2**
- 1 bis. TEMU’ “Digital Services Act” (additional webpage) 6**
- 2. Traders’ traceability 7**
 - Example 2. 7*
 - Example 2.2: 8*
 - Example 2.3: 9*
 - Example 2.4 10*
 - Example 2.5 11*
- 3. Manipulative practices 12**
 - 3.1. Manner in which prices and products are displayed on TEMU 12*
 - 3.2 Manipulation of consumers when registering/deleting accounts 13*

NB: webpages, links to products, traders’ URLs and associated screenshots were last accessed/taken on 2 May 2024.

(1) Temu Digital Services Act (DSA) Help Page¹

Available at: www temu.com/digital-services-act-help.html

Temu Digital Services Act (DSA) Help Page

The DSA regulates online intermediaries and platforms such as marketplaces, social networks, content-sharing platforms, app stores, and online travel and accommodation platforms in the EU. Its main goals are to prevent illegal and harmful activities online, ensure user safety, protect fundamental rights and create a fair and open online environment.

Temu has a commitment to creating a safe and positive online environment for its users. We continually invest in our policies and procedures to support the safety and wellbeing of our users. In accordance with the DSA, we set out below information around our approach to content moderation, misuse of Temu, our appeal system and how we recommend content to users. Further information can be found in the Temu [Terms of Use](#), including Temu's [Intellectual Property Policy](#) and its [Community Guidelines](#).

CONTENT MODERATION

The Temu Terms of Use prohibit the provision by users of certain content, including illegal content, to Temu (see, in particular, Temu's [Intellectual Property Policy](#) and its [Community Guidelines](#)) ("Prohibited Content"). Temu acts in a diligent, objective and proportionate manner in applying and enforcing those prohibitions.

Temu detects Prohibited Content on Temu in two main ways:

- As a result of voluntary own-initiative monitoring; or
- As a result of reports.

¹ TEMU's Term and Conditions, as defined in Article 3(u) DSA encompass the TEMU Digital Services Act (DSA Help Page) which is reproduced in this annex as well as other documents available over the following hyperlinks: TEMU's [Terms of Use](#), [Intellectual Property Policy](#), [Community Guidelines](#), [Privacy & Cookie Policy](#) and [Guidelines for Record Request](#).

Own-initiative monitoring

Own-initiative detection and moderation of Prohibited Content on Temu may be carried out through automated and/or human means. Our first level of moderation is performed automatically by a system that detects Prohibited Content. Where Prohibited Content is detected, it may be automatically deleted or disabled. Temu may also take other actions with respect to the content, the user's account or use of the Services (see the Temu [Terms of Use](#) for more information on the sanctions that may be imposed in relation to Prohibited Content).

Reports

You may report specific pieces of content (i.e. reviews and product listing) on Temu that you consider to be Prohibited Content by clicking on the three dots (“...”) next to the review in question or by clicking on “Report this item” below a product listing.

Your report should include the following:

- (a) a sufficiently substantiated explanation of the reasons why you allege the information in question to be Prohibited Content;
- (b) a clear indication of the exact electronic location of that information (such as the exact URL or URLs, and, where necessary, additional information enabling the identification of the content);
- (c) your name and email address, except in the case of information considered to involve one of the offences referred to in Articles 3 to 7 of Directive 2011/93/EU (sexual abuse and sexual exploitation of children and child pornography);
- (d) confirmation of your bona fide belief that the information and allegations contained in your report are accurate and complete.

Where the report contains your electronic contact information, Temu will send you a confirmation of receipt of the report. After reviewing your report, Temu will notify you of its decision in respect of the content to which the report relates and, where Temu has decided not to act upon the report, provide you with information on the possibilities for redress, including the option to appeal internally.

For reports relating to infringement of intellectual property rights, please go to our online intellectual property infringement report [portal](#) (see also our [Intellectual Property Policy](#)).

Statement of Reasons

Temu will provide you with a Statement of Reasons (SOR) if it imposes any of the following restrictions on the ground that the content provided by you is Prohibited Content:

- (a) restrictions of the visibility of specific items of information provided by you, including removal of content, disabling access to content or demoting content;
- (b) suspension, termination or other restriction of monetary payments;
- (c) suspension or termination of the provision of the service in whole or in part;
- (d) suspension or termination of your account.

provided it has your electronic contact details and you are located in the European Economic Area. The SOR will provide you with information on the possibilities for redress, including the option to appeal internally.

Appeals

If you have submitted a report and received a decision that Temu has decided not to act upon the report, or you have received a SOR, you may submit an appeal within 6 months after receiving that decision or SOR. You may submit your appeal free of charge, using the link provided within the decision / SOR. The form will allow you to submit a sufficiently precise and adequately substantiated appeal. Temu will reverse its decision / the SOR where a complaint contains:

- sufficient grounds for Temu to consider that its decision not to act upon a notice is unfounded;
- sufficient grounds for Temu to consider that the information to which the complaint relates is not Prohibited Content; or
- information indicating that the complainant's conduct does not warrant the measure taken,

Temu will inform you of its decision in respect of your appeal and, as appropriate, of the possibility of out-of-court dispute settlement provided for in Article 21 DSA and other available possibilities for redress.

Note: If a user frequently submit reports or appeals that are manifestly unfounded (i.e. submitting more than 10 (ten) reports or appeals that have been deemed manifestly unfounded within 7 (seven) days), Temu may suspend, after issuing a prior warning, the processing of their notices and appeals for a reasonable period (i.e. 30 (thirty) days). For information on our approach to requests from law enforcement and governmental entities, please see our **Guidelines for Record Request.**

HOW TEMU RECOMMENDS CONTENT?

We use various criteria for recommending content and products to you. The importance or weighting of a factor may change over time. Some factors are generally considered more significant than others in determining which content will be of most interest to you:

- Your browsing, searching and purchasing history on Temu;
- Ratings you have given to products on Temu; and
- Time you spend viewing specific product listings on Temu.

The following factors can also influence how content is recommended on Temu:

- Your account profile (such as your country and gender if recorded in your account profile) and preferences you have expressed on Temu such as saving a product to your wish list;
- Your approximate location based on your technical information (e.g. IP address)
- The popularity of products on Temu;
- Current sales campaigns; and
- Product prices.

Modifying/influencing the content recommended to you

You can change the content recommended to you by refreshing the page. The content that we recommend changes over time in accordance with the above criteria. For example, the content we recommend will change based on your purchase of different products, browsing for new products and similar activities by other users.

You can also change the layout of product listings by sorting them in accordance with:

- Relevance
- Top Sales
- Most Recent
- Price low to high
- Price high to low

For specific product searches, you can also filter the results by features of the products, for example by colour, by review ratings, by price and by specific product details.

AVERAGE MONTHLY ACTIVE RECIPIENTS

For details of the average monthly active recipients of Temu's services in the European Union published pursuant to Article 24(2) of the DSA, please click [here](#).

(1 bis) TEMU' "Digital Services Act" (additional webpage)

Available at: www temu.com/digital-services-act.html

Digital Services Act

Temu entered into the European Union ("EU") market in April 2023. Pursuant to Article 24(2) of the Digital Services Act (the "DSA"), we estimate that the average monthly active recipients of Temu's services in the EU was approximately 75 million, for the six months ended March 31, 2024.

We have produced this calculation for the purpose of complying with our DSA requirements and it should not be relied on for other purposes. Where we shared user metrics in other contexts, the methodology and scope may have differed. In addition, our approach to producing this calculation may evolve and may require altering over time, for example, because of new technologies.

We will continue to monitor the number of average monthly active recipients of Temu's services in the EU and will publish updated information at least every six months in accordance with Article 24(2) of the DSA.

Temu Digital Services Act (DSA) Help Page

For details of our content moderation and content recommendation policies pursuant to the DSA, please click [here](#).

(2) Traders' traceability

Example 2.1: *product URL (here) and traders' profile here*). When clicking on the logo of the trader, no additional information about the trader is displayed.

(Customization) 800pcs Circular Latex Advertising Balloons With Text And Pattern Printing, Birthday, Party Printing Logo Thickening (only Supports Monochrome Printing Content) - With Inflatable Pump

34 sold | Provided by (9.1K+ sold) >

Today **€43.19** Pay **€0.00** today **-69% final hours** €141.99 ?

Shop now and pay to **Klarna.** up to 30 days later ?

Spring OFFER ✓ Free shipping on all orders Limited-time offer

TEMU **HOT** Best Sellers 5-Star Rated Mother's Day deals Categories

ShengShi Hua' Ao **SSHA**

543 reviews | 4.7 ★★★★★ >

Example 2.2: product sold by Huimei (traders' profile [here](#)). When clicking on the logo of the trader, no additional information about the trader is displayed.



Unisex High Top FG Football Boots, Professional Outdoor Non-SI Breathable Lace Up FG Soccer Cleats

19 sold | Provided by  (410 sold) >

5.0 ★

Today ⚡ **€25.55** Pay €0.00 today (62% final hours) €67.39

Shop now and pay to **Klarna** up to 30 days later

Lightning DEAL ✓ Free shipping on all orders Limit

Color: Bright pink

Size(EU):

33.5 34 35 36 37 38.5 39.5 40. 41 42.5 43.5 44 45.5 46

Qty Only 5 left

✓ Add this item to enjoy free shipping and free returns!



Huimei boutique shoes


Items Men's Sports & Outdoor Shoes Reviews (4.4 ★)

Example 2.3: Product link [here](#) and trader's URS [here](#). When clicking on the logo of the trader, no additional information about the trader is displayed.



Mother's Day | ✓ Free shipping for you | Limited-time offer

Transparent Waterproofing Adhesive Bathroom Waterproofing Leakage Repair Coating Roof External Wall Without Smashing Brick Leakage Sealant Penetrant, For Hotel/Restaurant

72K+ sold | Provided by  (72K+ sold) > 4.7 ★★★★★

Today €2.52 -9% final hours Lowest recent price: €2.79

Special sale | Final hours!

Weight:

-9% 100g	300g/0.66lb	-39% 500g	500g*5 €10.63/Pc
100g*5 €2.40/Pc	300g/0.66lb*5 €7.59/Pc		

TEMU | Best Sellers | 5-Star Rated | Mother's Day Deals | Categories

 SOLID BUILDING WATERPROOFING

Example 2.4: Product link [here](#) and traders' URL [here](#). When clicking on the logo of the trader, no additional information about the trader is displayed.

Home > Smart Home > Wearable Technology > New Rugged Smart Watch Men...



Lightning Deal | ✓ Free shipping for you Limited-time offer

New Rugged Smart Watch Men Wireless Call IP68 Waterproof Sport Fitness AI Voice Outdoor 100+ Sports Modes Outdoor Smartwatch 🔗

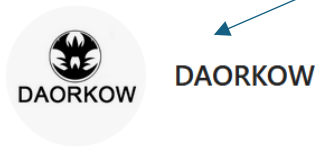
11K+ sold | Provided by (15K+ sold) > 4.6 ★★★★★

Today ⚡ **€23.59** -64% final hours RRP €65.99 📌

Lightning deal | 🕒 Final hours! >

Items:

- 64% Black silicone
- Gray silicone
- 🔥 Black Mesh Tape



2,329 reviews | 4.6 ★★★★★ >

- Pi***om on Apr 27, 2024 ★★★★★
- me***is on Apr 26, 2024 ★★★

Example 2.5: Product link ([here](#)) and trader's url ([here](#))

The screenshot shows a product page on the Temu website. The product is a 1pc Essential Oil Diffuser, Dragonfly Pattern 3D Firework Glass Aromatherapy Ultrasonic Humidifier. The price is €22.48, with a lowest recent price of €25.48. The product has 759 reviews with a 4.7-star rating. The page includes a navigation bar, a search bar, and a sidebar with category filters. The main content area features a large image of the diffuser, a description, a price tag, a quantity selector, and an 'Add to cart' button. The bottom of the page shows review statistics and shipping information.

Free shipping on all orders
Limited-time offer

Within 90 days

Get the Temu App

Best Sellers 5-Star Rated Spring Offers New Arrivals Categories

350ml Rainbow Raindrop Ultrasonic Humidifier Wire

Sign in / Register Orders & Account Support EN

Home > Home & Kitchen > Lighting & Accessories > 1pc Essential Oil Diffuser...

1pc Essential Oil Diffuser, Dragonfly Pattern 3D Firework Glass Aromatherapy Ultrasonic Humidifier, Timer Setting Auto Off, 7 Colors, For Bedroom, Living Room, Office, Spa, 200ml, BPA Free

44 sold | Provided by (5.5K+ sold) 4.7 ★★★★★

€22.48 ^{11%} Lowest recent price: €25.48

Spring OFFER ✓ Free shipping for you Limited-time offer

Items: Dragonfly Style Aromatherapy Lamp

Qty 1

✓ 100% of this item's reviews are positive

Add to cart
Only 18 left | 11% off discount

Provided by LANGMA. Ships from Temu.

Free shipping on all orders >
Delivery: Apr 11-17, 80.9% are ≤ 10 days
Get a €5.00 credit for late delivery
Courier company: DPD, Luxembourg Post, Bpost, Colis Prive, Spack, etc.

Free returns · Price adjustment >

Sustainability at Temu (6M+ trees) >

759 reviews | 4.7 ★★★★★

All reviews are from verified purchases

Shopping security >
• Safe Payment Options • Secure logistics

Item reviews (R) Provider reviews (759)

Store Information

Name
Shenzhenshilangmakeji Co., Ltd.

Address
1001, Shijie Building, No. 384, Gushu 1st Road, Gushu Community,
Xixiang Street, Baoan District, Shenzhen
Bao'an District
518101
Guangdong Province, Shenzhen City

Translation
Provider warrants that the above information is accurate and up to date. Provider's business information is in the official language where the provider is registered. Please be aware that the English version is provided via automatic translation tools and for reference only. Temu does not guarantee the accuracy of the English translation.

OK

(3) Manipulative practices

3.1. Manner in which prices and products are displayed

Example 3.1.1.



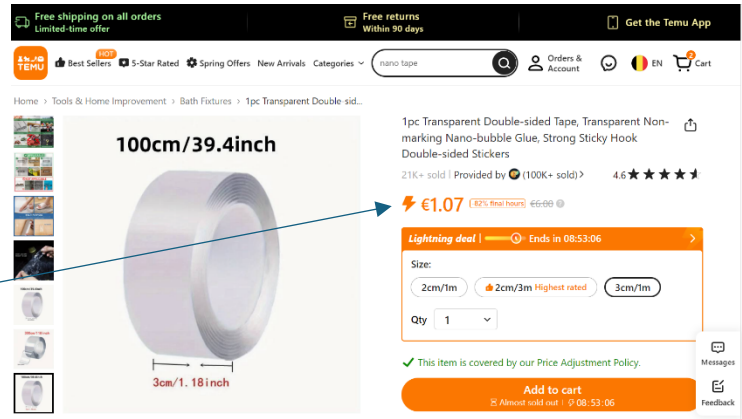
Lightning deal | 08:51:05

SPRING OFFER -19% 1pc Transpa...

⚡ €0.87 21K+ sold 

Almost sold out

★★★★★ (29,179)



Free shipping on all orders Limited-time offer

Free returns Within 90 days

Get the Temu App

TEMU Best Sellers 5-Star Rated Spring Offers New Arrivals Categories nano tape Orders & Account EN Cart

Home > Tools & Home Improvement > Bath Fixtures > 1pc Transparent Double-sid...

100cm/39.4inch

1pc Transparent Double-sided Tape, Transparent Non-marking Nano-bubble Glue, Strong Sticky Hook Double-sided Stickers

21K+ sold | Provided by (100K+ sold) > 4.6 ★★★★★

⚡ €1.07 (€2% final hours) €6.00

Lightning deal | Ends in 08:53:06

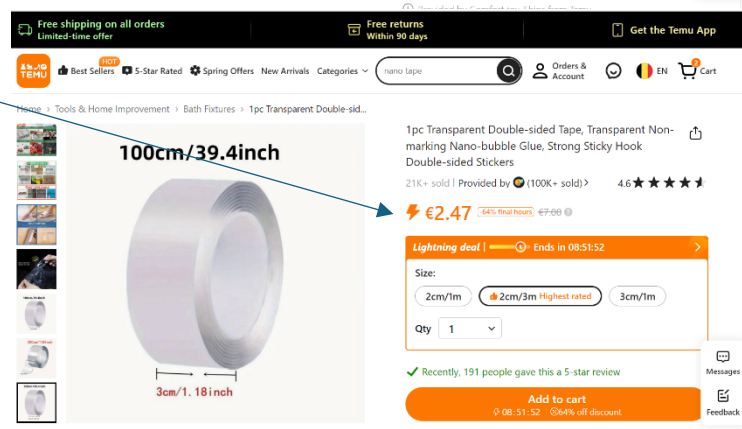
Size: 2cm/1m 2cm/3m Highest rated 3cm/1m

Qty 1

✓ This item is covered by our Price Adjustment Policy.

Add to cart Almost sold out | 08:53:06

Messages Feedback



Free shipping on all orders Limited-time offer

Free returns Within 90 days

Get the Temu App

TEMU Best Sellers 5-Star Rated Spring Offers New Arrivals Categories nano tape Orders & Account EN Cart

Home > Tools & Home Improvement > Bath Fixtures > 1pc Transparent Double-sid...

100cm/39.4inch

1pc Transparent Double-sided Tape, Transparent Non-marking Nano-bubble Glue, Strong Sticky Hook Double-sided Stickers

21K+ sold | Provided by (100K+ sold) > 4.6 ★★★★★

⚡ €2.47 (€4% final hours) €7.00

Lightning deal | Ends in 08:51:52

Size: 2cm/1m 2cm/3m Highest rated 3cm/1m

Qty 1

✓ Recently, 191 people gave this a 5-star review

Add to cart 08:51:52 | 64% off discount

Messages Feedback

Example 3.1.2. (link to the product [here](#))

temu.com/search_result.html?search_key=shaving%20razor&search_method=use...

Free shipping on all orders
Limited-time offer

Price adjustment
Within 30 days

Get the Temu App

Filters

Category

- Shave & Hair Removal
- Personal Care Products
- Hair Care
- Hair Cutting Tools
- Beauty Tools

Color

Intended Use

- Beard And Mustache
- Body
- Blade
- Eye/lens
- Underarm
- Leg
- Face

Handle Material

- Metal
- Wood

Sort by: Relevance

Lightning deal | Ending soon!

1Pcs Shaving Razor With 10pcs Blades...
\$1.39

Superior Stainless Steel
\$2.24

Old fashioned hand razors
\$1.88

1 Razor, 100 Blades
\$7.49

1 Razor 100 Blades
\$1.11

Double Edge Safety Razor
\$4.44

1pc Foldable Razor
\$1.11

Electric Shaver Fo...
\$13.87

temu.com/be/1-4-6pcs-pan-mini-cast-iron-miniture-skillet-commercial-mini-serv...

Free shipping on all orders
Limited-time offer

Delivery guarantee
Refund for any losses

Get the Temu App

14/6pcs Pan, Mini Cast Iron Miniture Skillet, Commercial Mini Server Pot, Back Round Mini Pan, Dia. 13.46cm, Small Frying Pans With Double Drip-Spouts For Stove, Oven, Grill Safe, Indoor And Outdoor Use

4.3 ★★★★★

Price: \$27.71

Quantity: 1

Add to cart

Free shipping on all orders

Item reviews (3) | Provider reviews (3)

See all reviews

temu.com/be/1-4-6pcs-pan-mini-cast-iron-miniture-skillet-commercial-mini-serv...

Free shipping on all orders
Limited-time offer

Delivery guarantee
Refund for any losses

Get the Temu App

14/6pcs Pan, Mini Cast Iron Miniture Skillet, Commercial Mini Server Pot, Back Round Mini Pan, Dia. 13.46cm, Small Frying Pans With Double Drip-Spouts For Stove, Oven, Grill Safe, Indoor And Outdoor Use

4.3 ★★★★★

Price: \$10.11

Quantity: 1

Add to cart

Free shipping on all orders

Item reviews (3) | Provider reviews (3)

See all reviews

temu.com/be/1-4-6pcs-pan-mini-cast-iron-miniture-skillet-commercial-mini-serv...

Free shipping on all orders
Limited-time offer

Free returns
Within 90 days

Get the Temu App

14/6pcs Pan, Mini Cast Iron Miniture Skillet, Commercial Mini Server Pot, Back Round Mini Pan, Dia. 13.46cm, Small Frying Pans With Double Drip-Spouts For Stove, Oven, Grill Safe, Indoor And Outdoor Use

4.3 ★★★★★

Price: \$29.91

Quantity: 1

Add to cart

Free shipping on all orders

Item reviews (3) | Provider reviews (3)

See all reviews

3.2 Manipulation of consumers when registering/deleting accounts

Steps for registering on Temu (no age-gating, no email verification)

Register

All data will be encrypted

Create your account

Registration is easy, just fill in the password.

Email

AccountCreation@hotmail.com

Password

Minimum 8 characters required

Password quality: -

Don't use a password from another site, or something too obvious like your pet's name.

Register

By clicking Register, you agree to our [Terms of Use](#) and acknowledge that you have read our [Privacy Policy](#).

My orders

All orders Processing Shipped Delivered Returns

Item name / Order ID / Tracking No. Q

You don't have any orders

Can't find your order?

Try signing in with another account Self-service to find order >

Steps to delete accounts:

The screenshot shows the Temu account security settings page. At the top, there are promotional banners for 'Free shipping on all orders' and 'Price adjustment'. The navigation bar includes the Temu logo, 'Best Sellers', '5-Star Rated', 'Spring Offers', 'New Arrivals', 'Categories', a search bar with 'stick on nails', and links for 'Hello Orders & Account', 'Support', and 'EN'. The left sidebar lists account management options, with 'Account security' highlighted. The main content area shows a security status message, followed by sections for 'Mobile phone number', 'Email', 'Password', 'Two-factor authentication: Off', 'Third-party accounts' (with links for Google, Facebook, Apple, and X), 'Sign in activity', and 'Delete your Temu account'.

Free shipping on all orders
Limited-time offer

Price adjustment
Within 30 days

Get the Temu App

TEMU Best Sellers 5-Star Rated Spring Offers New Arrivals Categories

stick on nails

Hello Orders & Account Support EN

- Your orders
- Your reviews
- Your profile
- Coupons & offers
- Credit balance
- Followed providers
- Browsing history
- Addresses
- Country/Region & Language
- Your payment methods
- Account security**
- Permissions
- Notifications

Your account is protected
Your Temu account is protected by advanced security. Keeping this information up-to-date safeguards your account even more.

Mobile phone number [Add](#)

Email [Edit](#)

Password ***** [Edit](#)

Two-factor authentication: Off [Turn on](#)
Protect your account by adding an extra layer of security.

Third-party accounts

- Google [Link](#)
- Facebook [Link](#)
- Apple [Link](#)
- X [Link](#)

Sign in activity
Review sign in activity for this account >

Delete your Temu account >

Home > Account security > Delete your Temu account

- Your orders
- Your reviews
- Your profile
- Coupons & offers
- Credit balance
- Followed providers
- Browsing history
- Addresses
- Country/Region & Language
- Your payment methods
- Account security**
- Permissions
- Notifications

How to delete your Temu account

Dear Temu customer,
You are about to submit a request for us to permanently delete your Temu account. If you proceed, Temu will delete the data and content in your account in accordance with applicable law and as described in the Privacy Policy. This includes communication records, files, and images, as well as any unused coupons and credits, which will no longer be usable after your account is deleted. Please be aware that you will no longer be able to make purchases on the Temu app or Temu.com once your account is deleted.

Before permanently deleting your Temu account, you may want to:

- Review your account one more time and confirm that all information in your account can be deleted forever. Please make sure to save any information in your account that you need for your records before permanently deleting your account.
- Check that there are no incomplete or post-sale orders, or ongoing processes in your account, as you will not have access to them after you delete your account.
- Use any available coupons and credits before deleting your account, as they will not be available anymore once the account is deleted.

I want to permanently delete my Temu account.


Reason for delete account ×

Please select the main reason for deleting your account:

- Unsatisfied with products or logistics
- Unsatisfied with games or promotions
- I have multiple accounts
- Safety or privacy concerns
- Too many messages and advertisements
- My issues with Temu are not resolved
- Unavailable in my Country/Region
- Another reason
- I don't want to provide a reason

Continue





Temu care about privacy and data security

Temu is committed to protecting the privacy, security and safety of your personal information and data. We strictly adhere to the principles of transparency and minimization of permissions, and ensure privacy and security with strict protocols.

- ✓ Safe payment options >
- ✓ Secure privacy >
- ✓ Secure permissions >
- ✓ Account security >

Continue deleting **Keep account**



Are you sure you want to delete your account? ×

Cancel **Delete**



Verify your identity ×

For your security, we need to make sure it's really you. You can choose the following ways to verify your identity.

Use email verification code to verify identity >

We will send a verification code to the email [redacted]

Use password to verify identity >

Please enter your password to verify your identity.




Enter the verification code ×

To continue, complete this verification step. We've sent a verification code to the email [redacted]. Please enter it below.

[] [] [] [] [] []

57s Resend code





Successfully requested ×

We've received your request to permanently delete your account. You will be automatically signed out of your account and it will be deleted in 7 business days. If you wish to cancel the request, you may sign in to cancel the request and keep your account.

Confirm