AliExpress.com Privacy Policy

(Effective as of August 12, 2024) To see prior version, click here.

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We at AliExpress ("we", or "us") recognize the importance of privacy and confidentiality of personal information.

AliExpress.com ("AliExpress" or, the "Platform") is a business to consumer (or "B2C") platform which connects and facilitates sales and purchases between business sellers (or "Sellers") and consumer buyers (or "Buyers").

This Privacy Policy sets out the ways in which we collect, use and disclose information in connection with the operation of the Platform, including personal information about you, Platform users, visitors and representatives. This Privacy Policy also applies to the use of the Platform via your mobile device. Other Alibaba services are governed by separate Privacy Policies, please refer to the Privacy Policy applicable to those services.

Depending on your location, the entity responsible for the handing of your personal information is:

- <u>For users located in Mainland China</u>: If you are a registered member of the Platform, and you are from mainland China, you are contracting with Hangzhou Alibaba Advertising Co., Ltd.
- <u>For users located in the United States</u>: If you are a registered buyer of the Platform, and you are from United States, you are contracting with AliExpress E-Commerce One Pte. Ltd.; If you are a registered seller of the Platform, and you are from United States, you are contracting with AliExpress International (United States) Corporation.

- <u>For users located in Brazil</u>: Users in Brazil are contracting with Alibaba.com Singapore E-Commerce Private Limited (incorporated in Singapore with Company Reg. No. 200720572D).
- <u>For users located in South Korea</u>: Users in South Korea are contracting with Alibaba.com Singapore E-Commerce Private Limited (incorporated in Singapore with Company Reg. No. 200720572D). In this regard, for users who access or use the Platform in South Korea, AliExpress.com Privacy Policy shall apply, and the data controller of your personal information is the same as your contracting entity.
- For users in other locations: If you are a registered member of the Platform, and either (a) you are from a place other than mainland China, and United States; or (b) you access and use the Platform from any of the Relevant Jurisdictions, you are contracting with Alibaba.com Singapore E-Commerce Private Limited (incorporated in 51 Bras Basah Road, #01-21 Lazada One, Singapore 189554 with Company Reg. No. 200720572D). Notwithstanding anything to the contrary in the foregoing provisions in this section, if you are a registered member of AliExpress, and you are resident in or access and use the Platform from any of the Relevant Jurisdictions, your contract is with ALIEXPRESS CIS HOLDING PTE. LTD. (incorporated in Singapore with Company Reg. No. 201917627W). "Relevant Jurisdictions" shall mean the Russian Federation, Azerbaijan, Armenia, Belarus, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Turkmenistan, Tajikistan and Uzbekistan. In this regard, for users who access or use the Platform from a Relevant Jurisdiction, the Privacy Policy of "www.aliexpress.ru" shall apply and to the extent that local data protection laws apply, the data controller of your personal information is the same as your contracting entity. For contact details, please see section P. HOW TO CONTACT US below.

A. COLLECTION OF INFORMATION

The personal information that we collect from you, either directly or indirectly, will depend on how you interact with us and the Platform. Such personal information broadly falls into the following categories:

Information That You Provide To Us:

We collect personal information directly from you when you choose to provide us with this information through your use of the Platform and through your other interactions with us, such as where you issue a complaint. Certain parts of the Platform ask you to provide personal data in order to set up and use it to as a Buyer or Seller.

If you are a Buyer, we will ask you to provide the following personal information:

Data Category	Data description	
Buyer Contact Information	Such as your name; address; phone number; email address.	
Buyer Payment Information	Such as credit card or similar payment information that you intend to purchase with; billing and delivery address.	
Purchase Information	Such as details of the goods purchased and how many.	
Complaint Information	Such as information connected with the Platform or goods and/or services purchased via the Platform as such information relates to a complaint.	
Identity Information	Such as a form of ID like a passport or other identity verification for after-sales services.	
Correspondence Information	Such as your correspondence relating to a customer service department, chat service, telephone or email.	

If you are a Seller (i.e. if you are an employee or representative of a Seller or a sole trader Seller (we'll refer to you as a Seller)), we will ask you to provide:

Data Category

Seller Business Information	Such as your corporate registration; business licenses, tax or other related information (where applicable).
Seller Payment Information	Such as your bank account details or other payment information the Seller uses to receive payment.
Product Information	Such as details of the goods and products the Seller intends to sell via the platform.
Seller Contact Information	Such as your name; address; phone number; fax and email address.
Social Media Information	Where you are a certified blogger or influencer for us, information such as your contact and social media account/blog information.
Questionnaire Information	Such as any response to questionnaires for market research/analytics which you choose to partake in which can include marital status, nationality, gender, date of birth, annual income and spending preferences. In some circumstances this could include or constitute information which is considered more sensitive. If you prefer not to provide such information, the use of our services and products will not be affected.
Correspondence Information	Such as your correspondence relating to a customer service department, chat service, telephone o r email.

Information That We Collect Indirectly:

If you are a Buyer or Seller or prospective Buyer or Seller, we will collect personal information indirectly, including through automated means from your device when you use our Platform. Some of the information we collect indirectly is captured using cookies and other tracking technologies as explained further in section F "COOKIES" below. We collect the following personal information indirectly:

Data Category	Data description	
Platform Activity Information	Such as details on the types and specifications of the goods sold and purchased, pricing and delivery information, any dispute records, communications between Buyers and Sellers and any information disclosed in any discussion forum.	
Platform Usage Information	Such as information relating to how you use and engage with the Platform including IP addresses, date and time of access to the Platform, device type, unique device identification numbers, browser type, broad geographic location (e.g. country or city-level location), browsing patterns and details of how you have interacted with our Platform and the goods and services available on it. In addition, we gather information about the Platform and visitors to the Platform including browser software, operating system, software and hardware attributes, pages viewed, number of sessions and unique visitors.	
Derived Information	Such as information we derive or infer about you based on your browsing and buying activity information and other information we have collected about you.	
Social Media Content	Where you are a certified blogger or influencer for us, your social media account handles and posts/comments made in relation to the Platform.	
Platform Contacts	Such as people or accounts with whom you share content or interact and contact information if you choose to upload or import it from a device (such as an address book).	

Information That We Receive From Third Parties:

If you are a Buyer or Seller we may receive personal information about you from third party sources, such as verification service providers and social media platforms where you choose to register for a Platform account via a social medica account.

We will only collect personal information from third parties where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

We collect the following personal information from the following categories of third parties:

Data Category	Data description
Social Media Profile Information	This may differ depending on which social media platform you are using and your privacy settings within the social media account but generally this will include basic public profile information such as your social media username, nickname or account name; your social media profile picture; country and company name (if applicable).
Compliance Information	Such as information required for the purpose of carrying out suitable money laundering, fraud and "know your customer" checks, including your name; email address; company details; and contact information.

B. USE OF PERSONAL DATA

We collect and use your personal information for the following purposes:

- **verifying Platform account registrations**, including conducting fraud, security, "Know Your Customer" and anti-money laundering checks in order to approve your Seller account;
- verifying your eligibility as a Platform blogger or influencer;
- setting up / administering Buyer and Seller accounts, including providing log-in IDs and setting up payment / transaction accounts;
- **providing customer service support,** such as responding to your queries, feedback and managing claims and/or disputes;
- providing/supporting general Platform services, facilitating communication between Buyers and Sellers, processing transactions and payments, assessing advance withdrawal requests from Sellers and providing logistics and delivery services, supporting Sellers with logistics and delivery;
- supporting Buyer and/or Seller clearance declarations / applications where made via the Platform;
- **providing relevant membership benefits**, including birthday rewards, membership offers and coupons, anniversary awards, exclusive member prices;
- verifying your identity and purchases in connection with product warranty or other after-sales claims;
- assessing and monitoring account security and transaction risks of Buyers and Sellers, such as detecting and preventing fraud, money laundering and other security incidents;
- sending and serving tailored marketing and advertising that we believe will be of interest to you based on the ways in which you use the Platform, your browsing records, and order history (we may use cookies and other similar technologies to provide you with marketing and advertising based upon your browsing activities and interests (see section F. COOKIES below for more information).
- conducting research and analytics to ensure the security of our Platform, to improve the content and layout of the Platform, and to improve our Platform, product offerings and services;
- Help you find people you may know who are also using AliExpress;

We may also use your personal information for other purposes that are compatible with the purposes we have disclosed to you if and where this is permitted by applicable data protection laws. You can request further information about the compatibility of other purposes upon request.

C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION

We disclose/share personal information with the following categories of recipients:

- o Other Platform Buyers and/or Sellers where necessary to support purchases and communications made between you. If you are a Buyer, Sellers that you purchase from will also control personal information about you relevant to or connected with your Platform purchases and communications with them. Please refer to Seller Privacy Policies for information about how they will process your information.
- Third party partners and service providers and/or affiliates engaged by or working with us to assist us in providing services to you or who otherwise process personal information for purposes described in this Privacy Policy or notified to you when we collect your personal information. Categories of these partners and service providers include:
 - Alibaba group entities and affiliated companies and/or their designated service providers that work with us to provide processing services such as software, tools, systems and messaging services for purposes described in this Privacy Policy;
 - Our business partners (for example, in order for them to provide you with discounts or offers that may interest Buyers or prospective Buyers) where you have consented to receiving such information from them if required by applicable data protection laws;
 - Marketing and advertising partners, such as Google, Twitter, Facebook, and Instagram, and providers of analytics services relating to users' behavior such as Appsflyer, Criteo, so that they may tailor the content you see when visiting our Platform for analytics and/or advertising purposes. These partners may combine information they collect on our Platform with data on their platforms and data they collect from other websites or through other sources in order to conduct targeted advertising. The processing activities of these third parties marketing platforms are governed by their own privacy policies, not this Privacy Policy (please refer to section F "COOKIES" below);
 - **Payment service providers** that provide payment processing services. The activities of payment service providers may be governed by their own privacy policies, not this Privacy Policy;
 - Credit risk assessment providers to conduct risk assessment on Sellers to determine whether a Seller can be permitted to make an advance withdrawal;
 - Logistics partners for providing delivery services for Buyers and Sellers, including return and exchange of products, and warehousing services for Sellers;
 - Customs agents for customs clearances purposes, where applicable to support Buyers and Sellers with international sales/purchases;
 - Cloud computing or other hosting service providers to provide cloud storage services;
 - Warranty service providers to provide product warranty services where requested by a Buyer or Seller;
 - Customer service support providers to provide after-sale services or other customer service support;
 - Risk control service providers to assess the security of Buyer and Seller accounts and transaction risks; and
 - Third party rating / reviewing service providers to carry out reviews of our services with customers if you choose to participate in reviewing or rating Platform products and/or services;
- To our professional advisers, law enforcement agencies, insurers, government and regulatory and other organizations where we believe it is necessary to comply with applicable laws or to exercise, establish or defend our legal rights or protect your vital interests or those of any other person; or as otherwise required or permitted by applicable laws.
- **To an actual or potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.

To any other person with your consent to the disclosure.

We have established relationships with other parties and websites to offer you the benefit of products and services which we do not offer. We offer you access to these other parties and their websites either through the use of hyperlinks to these sites from our Platform or through offering "co-branded" sites in which both we and other parties share the same uniform resource locator (URL), domain name or pages within a domain name on the Internet. In some cases you may be required to submit personal information to register or apply for products or services provided by such third parties or co-branded partners. This Privacy Policy does not apply to these third-party sites or co-branded sites. The privacy policies of those other parties may differ from ours, and we have no control over the information that you submit to those other sites. You should read the relevant privacy policy for those third parties sites and co-branded sites before responding to any offers, products or services advertised by them.

D. RETENTION

We will retain your personal information for as long as we have an ongoing legitimate business need to do so, to provide services or products to you, or as required or permitted by applicable laws. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. How long your data is kept for will also depend on how you use our website (for example if you are logged in as a member or you are visiting our website as a guest) and what the information you provide to us is used for. For example, if you are a registered member, certain data will be retained for a length of time following termination or deletion of your account, in order to comply with applicable laws [(for example, if a court order is received about your account, we would retain your account data for longer than the usual retention period when an account is deleted)] or in case of disputes. In other instances, the period of retention may be determined according to your activity on the Platform or to comply with a specific arbitration period/resolve a dispute.

E. RIGHTS REGARDING PERSONAL DATA

Under applicable laws, you may have rights of access to personal information held by us and other rights. If you are a Visitor from the European Economic Area or UK, please refer to section J. VISITORS FROM THE EUROPEAN ECONOMIC AREA or UK below for more information. If you are a Visitor from THE UNITED STATES, please refer to section K. VISITORS FROM THE UNITED STATES below. If you are a Visitor from Brazil, please refer to section L. VISITORS FROM BRAZIL. If you are a visitor from Mexico, please refer to section M. VISITORS FROM MEXICO. If you have any questions regarding this Privacy Policy or if you wish to access or correct your personal information as a user of AliExpress.com, please click here.

F. COOKIES

This section explains how we use cookies and similar technologies (we refer to them collectively as "cookies") to recognize you when you visit our Platform. It explains what these technologies are and why we use them, as well as your rights to control them.

What are cookies?

A cookie is a string of information that is sent to your browser and stored on your computer's or mobile device's hard drive. If you do not de-activate or erase the cookie, each time you use the same browser or device to access the Platform, our web servers will be notified of your visit to the Platform and, in turn, we may have knowledge of your visit and the pattern of your usage.

Cookies set by the site or app owner (in this case, AliExpress) are called "first party Cookies". Cookies set by third parties other than the site or app owner are called "third party Cookies". Third party Cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third-party cookies can recognize your device both when it visits the website in question and also when it visits certain other websites.

Cookies are also categorized as "session Cookies" (which are erased once you close the browser or shut down the device) and "persistent Cookies" (which remain even after closing the browser or shutting down the device/application and which are activated each time you visit the Platform). Session cookies use encrypted data to authenticate you. Persistent Cookies do not store account numbers or passwords. We use both session cookies and persistent cookies.

Why do we use Cookies?

We use first- and third-party Cookies for several reasons.

Some Cookies are required for technical and/or security reasons in order for our Platform to operate, and we refer to these as "essential" or "strictly necessary" Cookies. First party Cookies are mainly served to enable basic functionality on our Platform; including web analytics Cookies that help us understand how users use our web pages and how we can

improve their use. For example, we use essential or strictly necessary Cookies to enable us to remember goods added to your shopping basket and to recognize you when you sign into your account.

We also use social media Cookies. You may register for Platform membership and "share" Platform content through social media such as Facebook and Twitter. Sometimes we embed videos from websites like YouTube. These websites have their own privacy policies which govern their use of information, which you can find on the respective websites.

We also use Cookies to enable us to track and target the interests of Platform visitors to enhance the experience on our Platform by researching visiting patterns and conducting interest-based advertising; assisting our partners in tracking user visits to the Platforms; and to track progress and participation in promotions and the success of our email marketing campaigns. We use first- and third-party Cookies for these purposes.

For more information about the Cookies we use, please see our Cookie Notice.

G. MINORS

The Platform is intended for adults and users must be over 18 to use our Platform. We do not intend to sell any of our products or services to minors, as defined by applicable law. If a minor has provided us with personal information without parental or guardian consent, the parent or guardian should contact DataProtection.AE@aliexpress.com to remove the information.

H. SECURITY MEASURES

We implement appropriate technical and organisational measures to prevent unauthorized access to the Site, to maintain data accuracy and to ensure the correct use of the information we hold. Upon becoming aware of a data breach, we will notify you and the regulatory authorities in accordance with the timescales and scope required by applicable data protection law.

For registered users of the Platform, some of your information can be viewed and edited through your account, which is protected by a password. It is your responsibility to keep your password secure and confidential. We recommend that you do not divulge your password to anyone. We have instructed our personnel to never ask you for your password. If you share a computer with others, you should not save your log-in information (e.g., user ID and password) on that shared computer. Remember to sign out of your account and close your browser window when you have finished your session

No data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we use appropriate technical and organizational measures to protect the information we hold for you, we cannot guarantee the security of any information you transmit over the internet.

I. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments.

When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make and as required by applicable law, such as by posting an amended Privacy Policy on the Platform.

J. VISITORS FROM THE EUROPEAN ECONOMIC AREA OR UK

This section applies if you are based in the European Economic Area ("EEA") or UK. The data controller of your personal information is Alibaba.com Singapore E-Commerce Private Limited (incorporated in Singapore with Company Reg. No. 200720572D). For contact details, please see section P. HOW TO CONTACT US below.

Please also note, if you are a Buyer, Sellers will also act as a data controller of personal information about and your Platform purchases and communications with them. Please refer to the Privacy Policies of those Sellers for more information about the ways in which they will process such information.

Legal Basis for Data Processing

We process personal information for the purposes set out in this Privacy Policy. Our legal basis to process for processing your personal information will depend on the personal information concerned and the specific context in which we collect it, but will rely on one of the following legal bases:

- **Contract** we require certain personal data in order to provide the Platform to you under the contract between you and Alibaba.com Singapore E-Commerce Private Limited (for example, to provide you with the services you request and to identify and authenticate you so you may use the Platform);
- **Legal obligation** there are instances where we must process and retain your personal data as necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement);

- Legitimate interests we will use or disclose your personal data for the legitimate interests of either Alibaba.com Singapore E-Commerce Private Limited or a third party, but only where are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to operate our Platform and services, manage our relationship with you and communicate with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our Platform and our services, undertaking marketing, or for the purposes of ensuring the security of our Platform and services and detecting or preventing illegal activities such as fraud. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.
- Consent in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use or disclose your personal information, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you.

If we ask you to provide personal information to comply with a legal requirement or to enter into a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). In some instances, you may be required to provide us with personal information for processing as described above, in order for us to be able to provide you all of our services, and for you to use all the features of our Platform.

The following table provides more details on our purposes for processing your personal information and the related legal bases. The legal bases under which your data is processed will depend on the data concerns and the specific context in which we use it.

Purpose	Type of personal	Lawful basis for processing including basis of
	information	legitimate interests
Verifying Platform account registrations, including conducting fraud, security, "Know Your Customer" and anti-money laundering checks in order to approve your Seller account. Verifying your eligibility as a Platform blogger or influencer.	Compliance Information Seller Business Information Seller Contact Information Social Media Information Social Media Content	 Legal obligation. Performance of a contract with you. Performance of a contract with you.
	Social Media Profile Information	
Setting up / administering Buyer and Seller accounts, including providing log-in IDs and setting up payment / transaction accounts.	Buyer Contact Information Buyer Payment Information Purchase Information Seller Business Information Seller Payment Information Product Information Seller Contact Information	· Performance of a contract with you.

	Social Media Profile Information	
Providing customer service	Complaint Information	· Performance of a contract with you.
support, such as responding to your queries, feedback and managing claims and/or disputes.	Correspondence Information	Otherwise, as necessary for our legitimate interests to protect our business interests when conducting or defending a claim or to communicate with you where our communications are not necessary to perform or enter into a contract with you.
Providing/supporting general Platform services, facilitating communication between Buyers and Sellers, processing transactions and payments, assessing advance withdrawal requests from Sellers and providing logistics and delivery services, supporting Sellers with logistics and delivery.	Buyer Contact Information Buyer Payment Information Purchase Information Seller Business Information Seller Payment Information Product Information Seller Contact Information Correspondence Information	Performance of a contract with you. Otherwise, as necessary for our legitimate interests to operate our Platform and to communicate with you where our communications are not necessary to perform or enter into a contract with you.
	Platform Activity Information	
Supporting Buyer and/or Seller clearance declarations / applications where made via the Platform.	Buyer Contact Information Buyer Payment Information Purchase Information Seller Business Information Seller Payment Information Product Information Seller Contact Information	 Performance of a contract with you. Legal obligation. Otherwise, as necessary for our legitimate interests to operate our Platform and communicate with you where our communications are not necessary to perform or enter into a contract with you.
Providing relevant membership benefits, including birthday rewards, membership offers and coupons, anniversary awards, exclusive member prices.	Buyer Contact Information Buyer Payment Information Purchase Information	 Consent (where required under applicable law) Otherwise, as necessary for our legitimate interests to operate our Platform and communicate with you. To the extent it relates to our contractual agreement with you, for the performance of a contract with you.

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Verifying your identity and purchases in connection with product warranty or other aftersales claims.	Buyer Contact Information Buyer Payment Information Purchase Information Identity Information	 Performance of a contract with you. To the extent identity verification is required by law, in compliance with a legal obligation.
Assessing and monitoring account security and transaction risks of Buyers and Sellers, such as detecting and preventing fraud, money laundering and other security incidents.	Buyer Payment Information Purchase Information Seller Payment Information Product Information Platform Activity Information Compliance Information	 As necessary for our legitimate interests t o protect and operate our Platform, including to detect or prevent illegal activities and/or to manage the security of our IT infrastructure, and the safety of all users of the Platform. Legal obligation.
Sending and serving tailored marketing and advertising that we believe will be of interest to you based on the ways in which you use the Platform, your browsing records, and order history.	Buyer Contact Information Purchase Information Platform Activity Information Platform Usage Information Derived Information	 Consent (where required under applicable law). Otherwise, our legitimate interests to develop marketing activities and to promote our products and services to you.
Conducting research and analytics to ensure the security of our Platform, to improve the content and layout of the Platform, and to improve our Platform, product offerings and services.	Questionnaire Information Platform Activity Information Platform Usage Information Product Information Purchase Information	 Consent (where required under applicable law). Otherwise our legitimate interests to operate and provide our Platform and improve our Platform.
Help you find people you may know who are also using AliExpress	Platform Contacts	Our legitimate interests to operate our Platform, or with your consent

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under section P. HOW TO CONTACT US below.

You may contact Us using contact information provided in Section P "How to Contact Us" to refuse or withdraw the consent to the processing of personal information (including but limited collecting, usage and disclosure or sharing). However, in such cases, your use of the Platform may be restricted.

Your Rights

If you are a resident of the EEA or UK, you have the following data protection rights, which you can exercise at any time by contacting us using the contact details provided under section P. HOW TO CONTACT US below:

- The right to access your personal information and confirm the existence of processing.
- The right to correct, update or request anonymization, blocking or deletion of your personal information.

- The right to **object to processing** of your personal information when it is based on our legitimate interests.
- The right to ask us, in some situations, to **restrict processing** of your personal information or request portability of your personal information.
- The right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you to opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under section P. HOW TO CONTACT US below.
- If we have collected and process your personal information with your consent, then you have the right to **withdraw your consent at any time**. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- The right to request the review of decisions exclusively based in automated processing, which might affect your interests.
- The right to **complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. Certain supervisory authorities will require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

If you are aware of changes or inaccuracies in your information, you should inform us of such changes so that our records may be updated or corrected.

K. VISITORS FROM THE UNITED STATES

This section of our Privacy Policy contains information required by certain U.S. state data privacy laws. If you reside in California, Nevada, Colorado, Connecticut, Utah, or Virginia, this section applies to you and supplements the rest of our Privacy Policy above. Please refer to the state in which you reside to learn more about additional terms and rights that may apply to you.

If you are a registered buyer based in the United States, the data controller of your personal information is AliExpress E-Commerce One Pte. Ltd. If you are a registered seller based in the United States, the data controller of your personal information is AliExpress International (United States) Corporation. Your data will be stored in the United States. For contact details, please see section P. HOW TO CONTACT US below. Please also note that, if you are a Buyer, Sellers will also act as independent data controllers of your personal information, including information on your Platform purchases and communications between you and such Sellers. Please refer to the relevant Privacy Policy of the respective Seller for more information about the data practices and ways in which they will process such information.

Information Pertaining to Children

Our Platform is not directed to and we do not intend to, or knowingly, collect, or solicit personal information online from users under the age of 18, nor children under the age of 13. We do not knowingly collect personal information from children under the age of 13 or have any reasonable grounds to believe that children under the age of 13 are accessing or using our Platform. If you believe that a child under 13 may have provided us personal information, please contact us using the contact details provided under section P. HOW TO CONTACT US below.

California residents

This section supplements the description of our information collection and sharing practices described above under section A. COLLECTION OF INFORMATION and provides certain disclosures to California residents whose personal information we process pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CCPA").

<u>Collection of Personal Information</u>. During the preceding 12 months, we have collected, used, and/or disclosed the categories of personal information described above in section A. COLLECTION OF INFORMATION.

The personal information that we collect, or have collected in the preceding 12 months, falls into the following categories of personal information, as enumerated by the CCPA:

- Identifiers, such as your name, postal address, email address, user account name, and IP address;
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as your contact information;

- Commercial information, such as transaction information and purchase history;
- Internet or network activity information, such as your browsing history and interactions with our Platform;
- Geolocation data, such as your approximate location;
- Audio, electronic, visual, and similar information, such as your records of your support requests and interactions with our customer support service; and
- Inferences drawn from any of the above personal information to create a summary about you, for example of your preferences and characteristics.

In limited circumstances, we may also collect sensitive personal information as defined in the CCPA, such as account log-in information.

We may obtain the categories of personal information listed above from the categories of sources described above in section A. COLLECTION OF INFORMATION above.

<u>Use of Personal Information</u>. The business purposes for which we collect and handle personal information is described above in section B. USE OF PERSONAL DATA above.

<u>Disclosure of Personal Information</u>. We disclose or share personal information in the ways described above in section C. DISCLOSURE OF PERSONAL DATA, including by allowing third parties that provide us analytics and advertising services to collect information through cookies and other similar technologies.

The CCPA defines a "sale" as disclosing or making available personal information to a third party in exchange for monetary or other valuable consideration, and "sharing" includes disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, like many websites, we may "share" (as defined in the CCPA) certain identifiers (i.e., IP address and online identifiers), usage data, and inferences to advertising networks, data analytics providers, operating systems and platforms, and social networks, including in the context of our use of certain cookies, pixel tags, and other similar tools and technologies. We do so in order to improve and evaluate our advertising campaigns and better reach customers and prospective customers with more relevant ads and content.

The types of personal information that we may share include unique identifiers (e.g., cookies and similar technologies), device information, geolocation data, commercial data, behavioral data, and inferences.

To the extent that the use of cookies and other tracking technologies to disclose certain personal information to third parties to display targeted or personalized advertisements to you constitutes a "sale" or "sharing" of personal information under the CCPA, you may opt out of such cookies at any time by adjusting your cookie choices in our Cookie Preferences on our Platform to adjust your cookie choices.

We do not "sell" or "share" sensitive personal information, nor do we "sell" or "share" any personal information about individuals who we know are under sixteen (16) years old.

You can opt out of any future sale of personal information by using the contact details provided under section P. HOW TO CONTACT US below.

<u>California Privacy Rights</u>. If you are a resident of California, you have the following rights under the CCPA, subject to certain limitations and exceptions under applicable law:

- **Know and Access:** You have the right to request to know and access the following information covering the 12 months preceding your request:
 - the categories of personal information we have collected about you;
 - the categories of sources from which your personal information was collected;
 - the business or commercial purposes for collecting, "selling" and/or "sharing" your personal information;
 - the categories of third parties to whom we have disclosed, "sold" or "shared" personal information about you; and
 - the specific pieces of personal information we have collected about you.

You have the right to receive your personal information in a portable and commonly used format.

- Correct: You have the right to request that we correct any of your personal information that we have collected from you that is inaccurate.
- **Delete:** You may have the right to request that we delete certain personal information we have collected from you.

- Opt-out of the selling or sharing of your personal information: You have the right to request that a business not "sell" or "share" your personal information with a third party, as those terms are defined under the CCPA. As described above, we use cookies and other tracking technologies to make available certain personal information to third parties to display targeted or personalized advertisements to you. To the extent that such practice may constitute a "selling" or "sharing" of personal information under the CCPA, you may opt-out of such "selling" or "sharing" at any time by using our Cookie Preferences on our Platform to adjust your cookie choices.
- Limit the use and disclosure of sensitive personal information: We do not use or disclose "sensitive personal information" (as defined by the CCPA) for the purpose of inferring characteristics about you, or in any way that would require a right to limit under the CCPA. As a result, we do not offer an ability to limit the use or disclosure of sensitive personal information.
- **Non-Discrimination:** You have the right not to be discriminated against because you exercise your rights under the CCPA. We shall not discriminate against you for exercising any of your above rights, for example, we will not charge you different prices or provide different quality of services to you for exercising your CCPA rights unless those differences are related to your information or otherwise permitted by law.

<u>California Shine the Light Law.</u> Since 2005, California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share our customer's personal information with third parties for their own direct marketing purposes, without their approval. For inquiries regarding our disclosure policy, please use the contact details provided under section P. HOW TO CONTACT US below.

<u>Do Not Track.</u> California Business and Professions Code Section 22575(b) (as amended effective January 1, 2014) permits our customers who are California residents to be informed as to how we respond to Web browser "Do Not Track" settings. As 'Do Not Track' is a standard that is currently being developed, we do not take actions to respond to 'Do Not Track' settings, and instead we adhere to the standards set out in this Privacy Policy. If you would like to find out more about Do Not Track you may find the following link useful: http://www.allaboutdnt.com/.

Nevada residents

Under Nevada law, Nevada residents who have purchased goods or services from us may opt out of the "sale" of "covered information" (as such terms are defined under Nevada law) for monetary consideration to a person for that person to license or sell such information to additional persons. "Covered information" includes first and last name, address, email address, and phone number, or an identifier that allows a specific person to be contacted either physically or online. As discussed above, we share your information with certain third parties that we believe can provide you with offers and promotions for products and service of interest to you and in the other ways described above. We do not believe that our sharing in this regard would qualify as a sale under Nevada law. Nonetheless, if you are a Nevada resident who has purchased goods or services from us, you may submit a request to record your preference to opt out by using the contact details provided under section P. HOW TO CONTACT US below. Please note we may take reasonable steps to verify your identity and the authenticity of the request.

Colorado residents

The Colorado Privacy Act ("CPA") and its implementing regulations define "consumer" as a Colorado resident who is acting in an individual or household context only and does not include residents acting in a commercial or employment context. If you are a Colorado "consumer", you may have the following rights concerning your personal data, subject to certain limitations and exceptions under applicable law:

- Access: You have the right to request to confirm whether we are processing personal data about you and to access such personal data.
- <u>Data Portability:</u> You have the right to obtain your personal data in a portable and readily usable format.
- <u>Correction:</u> You have the right to request that we correct inaccuracies in the personal data we have collected about you, taking into account the nature of the personal data and the purposes of processing your personal data.
- **Deletion:** You have the right to request to delete certain of your personal data.
- Opt-out of Data Processing for purposes of Targeted Advertising; Sales to Third Parties; and Profiling: We do not engage in profiling of consumers in furtherance of automated decisions that produce legal or similarly significant effects, as those terms are defined under the Colorado Privacy Act. As described above, we do not sell personal data to third parties for money, nor for the purpose of profiling in connection with decisions that produce legal or similarly significant effects. However, we do process personal data for the purpose of displaying targeted or

personalized advertisements to you, if you instruct us to do so. You have the right to opt out of the processing of personal data for personalized advertising purposes at any time by changing your cookies choices via our Cookie Preferences on our Platform.

• <u>Appeal:</u> You have the right to appeal a refusal to take action on your request. You must ask us to reconsider our decision within 45 days after we send you our decision. We will endeavor to respond to your appeal within 60 days of such an appeal, including a written explanation of the reasons for the decision, and any action taken or not taken in response to the appeal.

Connecticut residents

The Connecticut Data Privacy Act ("CtDPA") defines "consumer" as an individual who is a resident of Connecticut. If you are a Connecticut "consumer", you may have the following rights concerning your Personal Information, subject to certain limitations and exceptions under applicable law:

- <u>Access:</u> You have the right to request to confirm whether we are processing personal data about you, and to access such personal data.
- <u>Data Portability:</u> You have the right to obtain your personal data in a portable and readily usable format.
- <u>Correction:</u> You have the right to request that we correct inaccuracies in your personal data.
- <u>Deletion:</u> You have the right to request to delete the personal data provided by you or obtained about you.
- Opt-out of Data Processing for purposes of Targeted Advertising; Sales to Third Parties; and Profiling: As described above, we do not sell personal data to third parties for money, nor for the purpose of profiling in connection with decisions that produce legal or similarly significant effects. We may process personal data for the purpose of displaying targeted or personalized advertisements to you, if you instruct us to do so. You have the right to opt out of the processing of personal data for personalized advertising purposes at any time by changing your cookies choices via our Cookie Preferences on our Platform.
- <u>Appeal:</u> You have the right to appeal a refusal to take action on your request. You must ask us to reconsider our decision within 45 days after we send you our decision. We will endeavor to respond to your appeal within 60 days of such an appeal, including a written explanation of the reasons for the decision, and any action taken or not taken in response to the appeal.

Utah residents

The Utah Consumer Privacy Act ("UCPA") defines "consumer" as an individual who is a resident of Utah acting in an individual or household context only and does not include residents acting in a commercial or employment context. If you are a Utah "consumer", you may have the following rights concerning your personal data, subject to certain limitations and exceptions under applicable law:

- <u>Access:</u> You have the right to request to confirm whether we are processing personal data about you, and to access such personal data.
- <u>Data Portability:</u> You have the right to obtain your personal data in a portable and readily usable format.
- <u>Deletion:</u> You have the right to request to delete the personal data provided by you or obtained about you.
- Opt-out of Data Processing for purposes of Targeted Advertising and Sales to Third Parties: As described above, we do not sell personal data to third parties for money, nor for the purpose of profiling in connection with decisions that produce legal or similarly significant effects. We may process personal data for the purpose of displaying targeted or personalized advertisements to you, if you instruct us to do so. You have the right to opt out of the processing of personal data for personalized advertising purposes at any time by changing your cookies choices via our Cookie Preferences on our Platform.

Virginia residents

The Virginia Consumer Data Protection Act ("VCDPA") defines "consumer" as a Virginia resident who is acting in an individual or household context only and does not include residents acting in a commercial or employment context. If you are a Virginia "consumer", you may have the following rights concerning your personal data, subject to certain limitations and exceptions under applicable law:

- Access: You have the right to request to confirm whether we are processing personal data about you, and to access such personal data.
- <u>Data Portability:</u> You have the right to obtain your personal data in a portable and readily usable format.
- Correction: You have the right to request that we correct inaccuracies in your personal data.
- <u>Deletion:</u> You have the right to request to delete the personal data provided by you or obtained about you.
- Opt-out of Data Processing for purposes of Targeted Advertising; Sales to Third Parties; and Profiling: As described above, we do not sell personal data to third parties for money, nor for the purpose of profiling in connection with decisions that produce legal or similarly significant effects. We may process personal data for the purpose of displaying targeted or personalized advertisements to you, if you instruct us to do so. You have the right to opt out of the processing of personal data for personalized advertising purposes at any time by changing your cookies choices via our Cookie Preferences on our Platform.
- <u>Appeal:</u> You have the right to appeal a refusal to take action on your request. You must ask us to reconsider our decision within 45 days after we send you our decision. We will endeavor to respond to your appeal within 60 days of such an appeal, including a written explanation of the reasons for the decision, and any action taken or not taken in response to the appeal.

Making US Privacy Rights Requests

If you are a resident of one of the above U.S. states and would like to exercise any of your rights described above, please submit your rights request by using the contact details provided under section P. HOW TO CONTACT US below. Once we receive your request, we may verify it by requesting information sufficient to confirm your identity, including by asking you to verify information about your use of the Platform.

Please note that the rights described above are not absolute, and where an exception under applicable law applies, we may be entitled to refuse requests in whole or in part.

In certain states (such as California), an authorized agent may submit a rights request on your behalf. If you use an agent, we may require you to provide the agent with signed permission to submit a request, require that you verify your identity directly, or otherwise require you to confirm you have provided the authorized agent with permission.

We endeavor to respond to a verifiable request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period (up to a total of 90 days) in writing. You may submit a request as frequently as you would like, but we are not required to respond to requests to provide personal information to you more than twice in any 12-month period.

L. VISITORS FROM BRAZIL

This section applies if you are based in Brazil. The controllers of the personal data are Alibaba.com Singapore E-Commerce Private Limited (incorporated in Singapore with Company Registration No. 200720572D). Your data will be stored in the United States. For contact details, please see section P. HOW TO CONTACT US below. Please also note, if you are a Buyer, Sellers will also act as a data controller of personal information about and your Platform purchases and communications with them. Please refer to the Privacy Policies of those Sellers for more information about the ways in which they will process such information. The personal data processing activities performed by us under the Platform for the Brazilian market, which includes any processing activity (i) carried out in Brazil, (ii) aimed at offering or providing goods or services or processing data of individuals located in Brazil, or (iii) collected in Brazil; users of the Platform in Brazil are carried out in accordance with the laws of Brazil, including the Marco Civil da Internet, Federal Law No. 12.965/2014 ("MCI") and the General Data Protection Law, Federal Law No. 13.709/2018 ("LGPD").

We process the categories of personal information described in Section A of our Privacy Policy. Depending on the services you use, this may include your identifiers (e.g. IP addresses, date and time of access to the Platform, and email addresses), business and internet or other electronic network activity information. It may also include inferences we draw from other information we collect.

Legal Basis for Data Processing

We process personal information for the purposes set out in this Privacy Policy observing legal bases set out in the LGPD. Our legal basis for processing your personal information will depend on the personal information in question and the specific context in which we collect it, but will include when it is:

• necessary for the performance of the contract between you and Alibaba.com Singapore E-Commerce Private Limited (for example, to provide the services requested by you and to identify and authenticate you so that you can use the Platform).

- necessary to comply with legal requirements (for example, to comply with applicable accounting rules and make required disclosures to law enforcement authorities);
- necessary to achieve our legitimate interests or those of third parties;
- based on your consent;
- necessary for the regular exercise of rights in judicial, administrative and arbitration proceedings;
- necessary for the protection of life and limb or of the data subject and third parties;
- used for credit protection purposes;
- used for other cases foreseen in the LGPD or applicable legislation.

If we collect and use your personal information based on our (or a third party's) legitimate interest, that interest will generally be to operate our Platform and services, manage our relationship with you and communicate with you as necessary to provide our services to you and for our legitimate business interest, for example in responding to your inquiries, improving our Platform and services, conducting marketing, or for the purpose of ensuring the security of our Platform and services and detecting or preventing illegal activities such as fraud. We may have other legitimate interests and, if appropriate, we will make clear to you at the relevant time what those legitimate interests are.

If we ask you to provide personal information to comply with a legal requirement or to enter into a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your personal information). In some cases, it may be necessary for you to provide us with personal information for processing as described above in order for us to provide you with all of our services and for you to use all of the features of our Platform.

If you have questions or need more information about the legal basis on which we collect and use your personal information, please contact us using the contact information provided in section P. HOW TO CONTACT US below.

Your Rights

You have the following data protection rights, which you can exercise at any time by contacting us using the contact details provided in section P. HOW TO CONTACT US below:

- The right to access your personal data and confirm the existence of processing.
- The right to correct, update or request anonymization, blocking or deletion of your personal information.
- The right to object to the processing of your personal information where it is based on our legitimate interests or in case of non-compliance with LGPD or applicable law.
- The right to ask us, in some situations, to restrict the processing of your personal information or to request portability of your personal information.
- The right to cancel marketing communications we send you at any time. You may exercise this right by clicking on the "unsubscribe" or "unsubscribe" link in marketing e-mails that we have sent to you. To unsubscribe from receiving other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact information provided in section P. HOW TO CONTACT US below.
- If we collect and process your personal information with your consent, you have the right to withdraw your consent at any time and request deletion of your personal data. Withdrawing your consent will not affect the lawfulness of any processing carried out prior to your withdrawal, nor will it affect processing of your personal information carried out on a legal basis other than consent.
- The right to request a review of decisions based solely on automated processing, which may affect your interests.
- The right to petition the National Data Protection Authority ANPD about our collection and use of your personal information.
- The right to request portability of your personal data to another service provider;
- The right to request information about with whom your personal data has been shared.

We respond to all requests we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. If you are aware of changes or inaccuracies in your information, you must inform us of such changes so that our records can be updated or corrected.

To exercise your rights, you or your authorized legal representative may contact us using the contact details provided in section P. HOW TO CONTACT US below. Once we receive your request, we may verify it by requesting sufficient information to confirm your identity, including requesting that you verify information about your use of the Platform.

M. VISITORS FROM MEXICO

This section applies if you are based in Mexico. The data controller of your personal information is Alibaba.com Singapore E-Commerce Private Limited (incorporated in Singapore with Company Registration No. 200720572D), located at 51 Bras Basah Road, #01-21 Lazada One, Singapore 189554. For contact details, please see section P. HOW TO CONTACT US below. Please also note that, if you are a Buyer, Sellers will also act as a data controller of personal information about and your Platform purchases and communications with them. Please refer to the Privacy Policies of those Sellers for more information about the ways in which they will process such information.

Legal Basis for Data Processing

Your consent is the basis for AliExpress to process your personal data, unless the processing is required by law. In that case your consent would not be required.

Use of Personal Data

Except for "Sending and serving tailored marketing and advertising that we believe will be of interest to you" and "Help you find people you may know who are also using AliExpress", which are secondary purposes, the rest of the processing purposes listed above in Section B. USE OF PERSONAL DATA are considered primary purposes.

If you do not want your personal data to be processed for secondary purposes and you do not want to receive our marketing and advertising communications, please click on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. You can also opt-out from those communications in the Settings Section of the Platform.

Disclosure or Sharing of Personal Information

Your consent is required to transfer your personal data to "our business partners" and to "actual or potential buyer" mentioned above in Section C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION of this Privacy Policy. With your consent to this Privacy Policy, you consent the data transfers mentioned in this paragraph.

AliExpress does not require your consent to disclose or share your personal information with the rest of the recipients mentioned in Section C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION of this Privacy Policy.

Your Rights

You have the following rights regarding your personal information: i) access; ii) rectification; iii) cancelation; iv) objection; v) revoking your consent; vi) limit the use or disclosure of your personal information.

If you want to exercise any of the rights previously mentioned please contact us using the contact details provided under section P. HOW TO CONTACT US below. Your request must include: (i) AliExpress account ID or registration email or phone number; and (ii) a description of the personal data which is intended to be exercised. We verify your identity when you access to our services by login-in to our services or through the email address registered in your account. Data subject requests sent by email must come from the email registered in your account, so we can verify your identity.

We will respond to any complete request within 20 days. The response will indicate whether the request is admissible. If it is admissible, we will make the determination within 15 days from the date you communicate the response. The deadlines may be extended in accordance with the applicable law. If you exercise your right of access, we will provide digital documents.

N. INTERNATIONAL TRANSFERS OF PERSONAL DATA

In connection with providing the services through our Platform, we will store your personal data processed through the Platform in the United States, Russia, Germany, China and/or Singapore, depending on the country you are located in, mainly for back up and data center storage. These countries have data protection laws that may have different provisions to the laws of your country. There will also be international transfers of your information among the above-mentioned countries. Where the transfer is not subject to an adequacy decision or regulations, we take appropriate steps to ensure that recipients of your personal information are bound to duties of confidentiality and we implement appropriate measures to ensure your personal information will remain protected in accordance with this Privacy Policy and applicable laws. The safeguards we use to transfer data in case of both our group companies and third party services providers for personal information originating from the EEA and UK are the European Commission's Standard Contractual Clauses, and the UK Addendum (as applicable). A copy of the relevant clauses can be obtained by contacting us using the contact details provided under section O. HOW TO CONTACT US below.

O. LANGUAGE

If there is any conflict between the English version and another language version of this Privacy Policy, the English version shall prevail.

P.HOW TO CONTACT US

For data subject rights, please click here.

Contact information of the Data Protection Officer: DataProtection.AE@aliexpress.com.