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**TO**

**European Commission**  
E-mail: [...]

**Consumer Protection Commission (Bulgaria)**  
1000 Sofia  
1 Vrabcha St., floors 3,4 and 5  
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[details of Romanian regulator to be added]

**Swedish Consumer Agency (Konsumentverket)**  
Box 48,  
651 02 Karlstad  
Sweden

**JOINT COMPLAINT**

**REGARDING: Cross-border violation of consumer protection laws by Shein and Temu**

**Dear ladies and gentlemen,**

We write to you on behalf of the Bulgarian E-commerce Association („BEA“) ([www.beabg.com](http://www.beabg.com))<sup>1</sup>, the Romanian Association of Online Stores (ARMO), the [details of xxxx association to be added], non-governmental organizations, aiming to represent the interests of the firms which engage in e-commerce in their respective countries.

A significant part of e-commerce within the EEA occurs on a cross-border basis. It is therefore in the interest of our members and all e-commerce players established in Bulgaria and Romania that cross-border trade within the EEA occurs in a predictable and harmonized legal environment, consistent with the provisions of European Union law. The harmonization and uniform application of consumer protection rules is intended to ensure a level playing field and fair uniform treatment of all e-commerce operators across the Union. At the same time, the purpose of these rules is to protect the interest of consumers and to ensure an effective protection of their rights. This legislative direction has been reinforced both by the Consumer Protection Cooperation Regulation<sup>2</sup> and by the amendments to the Consumer Rights Directive<sup>3</sup> as amended by the Omnibus Directive<sup>4</sup>.

It is common knowledge that traders and platform providers from third countries often operate in the EEA either directly or by means of subsidiaries without regard for the common European Union legal framework. Classic enforcement measures such as warnings, orders and fines against such players on the market often prove ineffective. On the other hand, coordinated measures by the competent consumer protection authorities have the potential to adequately address widespread violations of consumer protection rules, and if necessary, ensure their prompt cessation.

Against this background, we would like to raise the concern of our members, that the online platforms <https://www.temu.com/> (“**Temu**”) and <https://eur.shein.com/> (“**Shein**”), both originating outside the European Union, appear to act in systematic violation of the European consumer protection legislation. Such violations disrupt the normal competitive process while exposing consumers across the European Union to unlawful practices. Both companies are actively promoting their services at least in the concerned markets with strong reasons to believe that all Member States are affected. Thus, their aggressive strategy to breach all main pieces of consumer protection regulations requires a firm and coordinated response at European level.

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<sup>1</sup> BEA’s full and associated members include more than 80 local and international companies, as well as educational institutions, engaged in all aspects of the services and activities related to electronic commerce. More information about our membership is available from this link: [Членове - Българска Е-комерс асоциация \(beabg.com\)](http://Членове - Българска Е-комерс асоциация (beabg.com))

<sup>2</sup> Regulation (EU) 2017/2394 of the European Parliament and of the Council of 12 December 2017 on cooperation between national authorities responsible for the enforcement of consumer protection laws and repealing Regulation (EC) No 2006/2004

<sup>3</sup> Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights, amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council and repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council

<sup>4</sup> Directive (EU) 2019/2161 of the European Parliament and of the Council of 27 November 2019 amending Council Directive 93/13/EEC and Directives 98/6/EC, 2005/29/EC and 2011/83/EU of the European Parliament and of the Council as regards the better enforcement and modernisation of Union consumer protection rules

In this respect, please find below a summary of the main legal concerns that need to be tackled by the competent authorities as soon as possible to avoid further harm to consumers and businesses.

## **1. Main unlawful practices - Summary**

### **Temu**

- 1.1. Temu violates the Price Indication Directive and the Omnibus Directive by not indicating the required lowest price in effect during the previous 30 days. Furthermore, Temu instead presents a crossed-out manufacturer recommended price which is misleading.
- 1.2. Temu exerts pressure on the consumers by means of overabundance of limited-time and limited availability offers, some of which are false or otherwise misleading. This unfair commercial practice could be classified as a dark pattern.
- 1.3. Temu uses vague terms in relation to the prices of products. Such omission of material information regarding the final price could be classified as a misleading practice.
- 1.4. Temu provides information about the minimum order price at a late time in the shopping process. This delay of information could result in a misleading “bait and switch” practice, when a consumer has sunk their time in choosing a specific item that is just below the minimum price.
- 1.5. Temu utilized confusing and misleading commercial practices involving coupons.
- 1.6. Temu provides misleading “price equalization” and “cash on delivery” guarantees, which would generally not be available due to the impossible conditions for their application.
- 1.7. Temu does not provide information on sellers on its platform as required by the Omnibus Directive. In case these sellers are not traders, this could mislead them into making a purchase that would not provide them with sufficient consumer protection.

### **Shein**

- 1.8. Shein violates the Price Indication Directive and the Omnibus Directive by not indicating the required lowest price in effect during the previous 30 days for price reduction communications at the listing stage.
- 1.9. Shein does not provide the required information regarding customer reviews, in a potentially misleading manner, making it hard for consumers to judge whether such reviews are trustworthy.
- 1.10. Shein presents environmental messages in a way that fails to convey reliable information to support the claims. Relying on a false green claims is a misleading practice in violation of the Unfair Commercial Practices Directive.
- 1.11. In violation of the Unfair Commercial Practices Directive, Shein implements confusing discount mechanisms in the form of coupons.

## **2. Detailed analysis of unlawful practices by Temu**

## 2.1. Non-compliance with price reduction announcement rules

2.1.1. Art. 6a of the Price Indication Directive<sup>5</sup> introduced by means of the Omnibus Directive requires that traders, when informing of a price reduction, must indicate the lowest price of the goods that was in effect during the 30 days prior to the introduction of the price reduction (the so-called "**Omnibus Price**").

2.1.2. Price reductions are used within Temu **without indication of the Omnibus Price**. The price reductions are presented on the listings, offer pages, on product pages, in the shopping cart / order summary, or in ads on social networks. See screenshot examples in the Appendix.

2.1.3. Temu provides an explanation that the price crossed out is the suggested or recommended retail price of the product, as determined by the manufacturer and provided by the manufacturer, supplier, or merchandise partners. Providing an arbitrary manufacturer recommended price instead of the legally required lowest previous price could also be confusing to consumers and could constitute a misleading commercial practice forbidden by Art. 5 of the Unfair Commercial Practices Directive<sup>6</sup>. See screenshot examples in the Appendix.

2.1.4. Throughout the Temu website, price reductions are presented in a manner contrary to consumer regulations. At no stage of the presentation of the discount is the Omnibus Price presented, and the prices crossed out are the manufacturer's suggested prices.

## 2.2. Misleading urgency messages

2.2.1. Article 5 of the Unfair Commercial Practices Directive prohibits unfair commercial practices, in particular including misleading and aggressive practices. Annex I of the Directive contains a list of commercial practices which shall in all circumstances be regarded as unfair. Its item 7 provides that "*Falsely stating that a product will only be available for a very limited time, or that it will only be available on particular terms for a very limited time, in order to elicit an immediate decision and deprive consumers of sufficient opportunity or time to make an informed choice*" is such a misleading practice.

2.2.2. False countdown counters or limited time offers are often used on the Temu interface. For example, a counter counting down the free delivery time for all orders. After refreshing the service, the counter starts counting down again. The free delivery countdown has also been used in the mobile version. Even in cases where no countdown is present, the free delivery option is designated as a "limited-time offer" but when

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<sup>5</sup> Directive 98/6/EC of the European Parliament and of the Council of 16 February 1998 on consumer protection in the indication of the prices of products offered to consumers

<sup>6</sup> Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council

clicking on the respective message, no explanation is provided about the term of expiry of the offer. See screenshot examples in the Appendix.

2.2.3. Other examples from Temu's website are messages and pop-ups whose content is characterized by haste or limited availability claims, such as "Instant bargain" / "Lightning deal" with a deadline, "Hurry up! More than 377 users already have this product in their shopping cart," "Popular! Almost sold out."

2.2.4. These messages, in such intensity, should be qualified as an example of deceptive interfaces, because they exert purchasing pressure on the user. Their content and surprising appearance on the screen are intended to motivate the consumer not only to buy faster, but also to impress upon him that if he does not finalize the order in a while, or if he does not add a certain product to the shopping cart at this moment, this product with certain conditions (price, free delivery) will no longer be available.

2.2.5. The type of activity, used by Temu, has been classified as **dark pattern** by, among others, the British supervisory authority<sup>7</sup>, as well as the European Commission<sup>8 9</sup>. See additional screenshot examples in the Appendix.

### 2.3. Unclear presentation of price information

2.3.1. According to Art. 4 of the Price Indication Directive the selling price must be unambiguous and easily identifiable. Violating this rule could also result in a misleading commercial practice prohibited by the Unfair Commercial Practices Directive, for example due to the omission of material information regarding the final price<sup>10</sup>.

2.3.2. Temu uses vague terms in relation to the price for some products offered on the website. Examples of this practice at the order cart stage can be seen in the Appendix.

2.3.3. When specifying the price of a product, Temu uses the explanation: "*We do not guarantee that the selected products will be available and at the quoted price by the time the payment is finalized.*" or "*Item availability and pricing are not guaranteed until payment is final.*" Communicating the price in this manner is misleading.

2.3.4. Price is one of the most important elements that guide consumers in making purchasing decisions. For this reason, traders are obliged to indicate the unambiguous value that the consumer will be obliged to pay, if the contract is concluded.

### 2.4. Delayed and misleading information about the minimum order value

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<sup>7</sup> [Online Choice Architecture - How digital design can harm competition and consumers - discussion paper \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101444/online-choice-architecture-discussion-paper.pdf), Choice pressure.

<sup>8</sup> European Commission, Directorate-General for Justice and Consumers, Lupiáñez-Villanueva, F., Boluda, A., Bogliacino, F. et al., *Behavioural study on unfair commercial practices in the digital environment – Dark patterns and manipulative personalisation – Final report*, Publications Office of the European Union, 2022, <https://data.europa.eu/doi/10.2838/859030>

<sup>9</sup> Commission Notice – Guidance on the interpretation and application of Directive 2005/29/EC of the European Parliament and of the Council concerning unfair business-to-consumer commercial practices in the internal market (C/2021/9320), section 4.2.7. Data-driven practices and dark patterns

<sup>10</sup> Reference is made to Art. 7, Para 1 and 4(c) of the Unfair Commercial Practices Directive.

- 2.4.1. Lack of on-time material information regarding minimum order value as a condition of purchase is a misleading practice in itself. However, it could result in another type of forbidden practice – the “bait and switch”, when it aims to persuade the customer to purchase additional products<sup>11</sup>.
- 2.4.2. Temu requires a minimum order value, i.e. the value from which an order can be placed.
- 2.4.3. However, Temu informs that the order may involve the minimum order value either when clicking on the “limited-time offer” on free shipping which is not intuitive and obvious, or at the final stage of the purchase path, i.e. when the user clicks on the “place order” button. A message informing about the minimum order value could appear on the user's screen if the order is below the respective threshold. Sometimes, the user can learn about the minimum order value only from the content of the order button - also this is the stage of the order summary. Such a message is visible to a logged-in user. A non-logged-in consumer on the Temu website does not see a message on this subject at all. It should also be noted that different minimum price is sometimes displayed when using the app and the desktop version, with the same user profile. See screenshot examples in the Appendix.
- 2.4.4. Information about conditioning an order on the value of the shopping cart should be communicated at the very beginning of the purchase path in an obvious and clear manner so that the consumer can decide early on whether to continue with the purchase process or terminate it.
- 2.4.5. **Temu's practice is misleading and may also be qualified as a dark pattern.** This is because disclosing the minimum order value at the final stage of the purchase path manipulates the consumer's shopping process in such a way that it forces the selection of additional products to fulfil the order. In addition, disclosing the minimum order value in the content of the order button is far too late to provide the consumer with important information regarding the limitation of purchase fulfilment and wastes the time of the consumer.

## 2.5. Misleading practices regarding coupons

- 2.5.1. After downloading the Temu app, the user was presented with a set of coupons on the screen, along with a counter counting down the time until the coupons expire. See screenshot examples in the Appendix.
- 2.5.2. In turn, after a certain period of use, a promotion of a similar nature is displayed, screenshots of which are shown below. See screenshot examples in the Appendix.
- 2.5.3. The above promotional actions, the nature of which is to suggest the randomness of winning and the randomness of winning the prize, are communicated to users using Temu in the form of pop-ups. The messages inform consumers that they can win a certain

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<sup>11</sup> Reference is made to item 6(b) of Annex 1 to the Unfair Commercial Practices Directive – “*Making an invitation to purchase products at a specified price and then ... refusing to take orders for it ... with the intention of promoting a different product*”;

amount. However, the purchase of coupons as part of the promotional action is possible only after first making purchases within Temu, so spinning the wheel does not allow the coupons to be purchased immediately. What's more, after receiving the coupons, the consumer can use the "guaranteed prize" after splitting it into several separate coupons of lower value. Each coupon can be used within a separate order (coupons do not combine). The value of the coupon received depends on the value of the purchase made and has only 24 hours from the time of registration to do so. The described conditions do not result from the initial stage of getting acquainted with the promotional action, and are only available at a later stage, after clicking on tooltips.

2.5.4. Attention should be drawn to the vague terms of the promotional activity, which are hidden on the side of the screen and which contain many abusive clauses concerning, among other things, the possibility of cancelling, suspending or modifying any aspect of the promotion at any time and without notifying consumers, or defining the jurisdiction of the law to the laws of the State of New York.

2.5.5. We believe that promotions of such nature are confusing for the consumers and therefore could mislead them in a similar violation of the Unfair Commercial Practices Directive as per the previous examples.

## **2.6. Misleading practices on price equalization and available cash on delivery guarantees**

2.6.1. Additional practices of Temu that could easily deceive consumers could also be qualified as misleading commercial practices forbidden by Art. 5 of the Unfair Commercial Practices Directive.

2.6.2. On the product page, Temu includes a "price equalization" guarantee, according to which if the market retail price has been reduced within 30 days of purchase, the consumer can claim a refund for the price adjustment. See screenshot examples in the Appendix.

2.6.3. In fact, products on sale, in promotion or unavailable are not eligible for price equalization, and Temu reserves complete discretion over changes to the program rules and their interpretation, or the group of products subject to alleged equalization. Information about "price equalization" appears on the product pages of discounted products (and therefore not eligible for equalization) as one of the guarantees alongside "cash on delivery" and "free returns," which is misleading to consumers. Also, given the very high saturation of Temu with discounted products, the price adjustment may turn out to be a completely bogus guarantee and one that the consumer will never be able to take advantage of. See

2.6.4. Temu also reserves the right to refuse price adjustments at its own discretion. See screenshot examples in the Appendix.

2.6.5. The "cash on delivery" guarantee also only ostensibly appears as available on listings of Temu. See screenshot examples in the Appendix.

2.6.6. When expanded, however, the consumer learns from the message that this method is available only to selected countries in the Arabian Peninsula and the Persian Gulf. See screenshot examples in the Appendix.

## **2.7. Lack of specific information requirements for contracts concluded on online marketplaces**

2.7.1. Article 6(c) and 6a of the Consumer Rights Directive supplemented by the Omnibus Directive, requires that the provider of an online marketplace shall provide additional mandatory information, such as:

- whether the third party offering the goods is a trader or not, and if not, that the consumer rights stemming from EU consumer protection law do not apply to the contract;
- how the obligations related to the contract are shared between the third party offering the goods and the provider of the online marketplace;
- adequate means of quick and efficient communication with the seller.

2.7.2. The Temu platform does not contain such information which not only violates the cited texts of the Consumer Rights Directive, but also could constitute a misleading omission prohibited by Art. 7 of the Unfair Commercial Practices Directive<sup>12</sup>, especially if the seller is not a trader and the consumer's rights are not applicable. The information (i) button next to the seller's name is typically inactive and does not provide additional information. When clicking on the seller's profile, the consumer is presented with their other listings and given the option to follow, but no meaningful information is provided. See screenshot examples in the Appendix.

## **3. Schein**

### **3.1. Non-compliance with price reduction announcement rules**

3.1.1. Price reduction communications are often used within Schein at the listing stage without indication of the Omnibus Price, in violation of Art. 6a of the Price Indication Directive. See screenshot examples in the Appendix.

### **3.2. Misleading product reviews**

3.2.1. Art. 7, Para 6 of the Unfair Commercial Practices Directive provides that „*Where a trader provides access to consumer reviews of products, information about whether and how the trader ensures that the published reviews originate from consumers who have actually used or purchased the product shall be regarded as material.*” Lack of such information, where required, could be qualified as a prohibited misleading omission.

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<sup>12</sup> Reference is made to Art. 7, Para 4(f) of the Unfair Commercial Practices Directive, as supplemented by the Omnibus Directive – “*In the case of an invitation to purchase, the following information shall be regarded as material, if not already apparent from the context: ... (f) for products offered on online marketplaces, whether the third party offering the products is a trader or not, on the basis of the declaration of that third party to the provider of the online marketplace*”.



3.2.2. Shein does not provide users with information on whether reviews come from consumers who have actually purchased the product, and how any verification of reviews is done. It is also unclear how reviews are counted (e.g., whether all reviews count towards the average - from several of our calculations, the average product rating is not the average of all ratings). In practice, therefore, the reviews and rankings presented by Shein may mislead consumers. Consumers are not given adequate information to judge whether such reviews can be trusted. See screenshot examples in the Appendix.

3.2.3. Shein's indicated product rating rules are available at this link: <https://eur.shein.com/eur/en/Rating-Rules-a-1519.html>.

### 3.3. Unsubstantiated environmental claims "greenwashing"

3.3.1. Greenwashing is defined as a type of marketing communication aimed at creating the misleading impression that a company is supposed to be environmentally friendly<sup>13</sup>. In order for claims relating to environmentalism to be true, entrepreneurs' declarations must be reflected in their daily operations. False green claims are in violation of Articles 6 and 7 of the Unfair Commercial Practices Directive on misleading actions and omissions. In addition, such practice could be in violation of Art. 5, Para 2 of the Directive which prohibits commercial practices that are contrary to the requirements of professional diligence if they are likely to materially distort the economic behaviour of the average consumer.

3.3.2. See screenshot examples in the Appendix on the manner in which Shein presents environmental messages. Such messages (which are used in many other places in the interface, for many products) may constitute an unfair market practice in connection with the failure to convey reliable information to support claims relating to environmental aspects.

3.3.3. In addition, it should be pointed out that Shein is associated in the public space with an "ultra fast fashion" brand. More than 6,000 new products appear on the site every day<sup>14</sup>. Due to the number of items produced, the brand cannot be considered environmentally friendly. The brand's ecological claims have no reference to reality<sup>15</sup>. The prevailing position on the Internet is that "Shein and ecology is actually an oxymoron."<sup>16</sup>

### 3.4. Unclear rules and inability to use coupons

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<sup>13</sup> Commission Notice – Guidance on the interpretation and application of Directive 2005/29/EC of the European Parliament and of the Council concerning unfair business-to-consumer commercial practices in the internal market (C/2021/9320), section 4.1.1. Environmental claims

<sup>14</sup> <https://fashionbiznes.pl/jak-shein-zostalo-najwieksza-marka-fast-fashion-na-swiecie-oto-case-study-chinskiego-giganta-odziezowego/>

<sup>15</sup> <https://www.wirtualnemedi.pl/arttykul/hsbc-greenwashing> and <https://www.asa.org.uk/rulings/hsbc-uk-bank-plc-g21-1127656-hsbc-uk-bank-plc.html>

<sup>16</sup> <https://fashionbiznes.pl/jak-shein-zostalo-najwieksza-marka-fast-fashion-na-swiecie-oto-case-study-chinskiego-giganta-odziezowego/>

3.4.1. In violation of Art. 6 and 7 of the Unfair Commercial Practices Directive, Shein implements confusing discount mechanisms in the form of coupons. The consumer has no information for which "selected" products he can use such a coupon. See screenshot examples in the Appendix.

3.4.2. When trying to use a coupon, the use turns out to be impossible and there is still no information for which products this coupon should be active. In addition, Shein encourages the use of a coupon that does not apply to the items purchased. See screenshot examples in the Appendix.

**In consideration of the above, we consider that the outlined practices fit the definition in of the Consumer Protection Cooperation Regulation and the Omnibus Directive of “widespread infringement”, and potentially even of “widespread infringement with a Union dimension”.**

**We, therefore, petition the Commission and the competent national consumer protection authorities to launch a coordinated action in order to carry out appropriate investigation of Temu and Shein within the European Consumer Protection Cooperation Network, and, if necessary, enforce the uniform application of European consumer protection rules.**

**Considering that the business models and activities of both Temu and Shein originate from a third country, we urge you to consider taking measures to bring the effective cessation of the violations of European laws, including by means of fines, removing, disabling or restricting access to their online interfaces, and deleting their domain names.**

We remain available should the Commission require any additional input or information.

*Sincerely,*

**Janet Naydenova**  
Chairman of the Management Board  
Bulgarian E-commerce Association

**Cristian Pelivan**  
Executive Director  
ARMO




## Appendix


### 2 Temu


#### 2.1 Non-compliance with price reduction announcement rules

##### Examples to paragraph 2.1.2

##### Bulgaria:


**Temu Bulgaria**   
Sponsored · 

Ready for some serious savings? Download Temu and enjoy up to 90% off 




Suissewin Waterproof Large Capacity...  
BGN6.48

Shop now





Zipper Sleeve Pocket Waterproof Drawstring...  
BGN6.85


Shop now





Girls Dress  
BGN3.


 330



 Like


 Comment



 Share



 Quick look

4pcs Oral-B Precision Clean Toothbrush...  
**3,49лв.** 9,99 63K+ sold **-65%**   
 rated 5 stars 27 min ago  
★★★★★ (10,114)



1pc 7 Hole Black Cable Organizer, Cabl...  
**1,29лв.** 9,79 44K+ sold **-86%**   
 bought 2 min ago  
★★★★★ (25,187)

Page 11 of 35


✓ Free shipping on all orders

Limited-time offer


✓ Select all (1)

☰

✓



4pcs Oral-B Precision Clean Toothbrush Heads - Enjoy a Cleaner, More Comfortable Oral Care E...

By  Yiwu Xinrui >

4pcs >

3,49лв.

-65%

9,99

43 just sold

In 999+ other carts

Qty 1 ▾

☒

🔍 Can't find your items? [Sign in to check your cart >](#)

Items you may want to add

Order Summary

Item total:

9,99лв.

Item discount:

-6,50лв.

Total (1 item)

3,49лв.

All taxes included

Checkout (1)

🔔 Item availability and pricing are not guaranteed until payment is final.


🔒 You will not be charged until you review this order on the next page

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Romania

⚡ Salvează La Top Articole ⚡



**JELLOO**

Se termină în 02:16:39:17


**-56%** Ceas Inteligent JELLOO Cu ...

**127,29Lei** 181 vândute

Au mai rămas doar 4

★★★★★ (3.960)

Direct din JELLOO



IT CAN BE CONNECTED TO A MOBILE PHONE


You can take pictures of what you want

**-68%** Binoclu HD 3000X22 Cu M...

**51,18Lei** 16399 912 vândute

tocmai a fost achiziționat

★★★★★ (480)




**-51%** Încărcător Fără Fir Multifun...

**93,94Lei** 27K+ vândute

aproape epuizat

★★★★★ (26.844)



**XKRC** X6 PRO

Intelligent obstacle avoidance


Dual cameras, simple and easy to control, for love to take off

**-47%** Dronele Pliabile XKRC X6 C...

**250,44Lei** 36K+ vândute

tocmai a fost achiziționat

★★★★★ (29.706)



**-44%** Husă De Telefon Cu Încărc...

**51,44Lei** 9319 637 vândute

Au mai rămas doar 1

★★★★★ (10.593)





4pcs Oral-B Precision Clean Toothbrush Heads - Enjoy a Cleaner, More Comfortable Oral Care Experience!



63K+ sold | Provided by >

4.8 ★★★★★

#1 Best Seller in Oral Care Products >

3,49лв. -65% 9,99 All taxes included

Items on Temu may display a strikethrough price, which is the suggested or recommended retail price of a product set by the manufacturer and provided by a manufacturer, supplier, or merchandise partners.

[How is Temu able to offer lower prices than others?](#)

Limited-time offer

Hurry ! Over 999 people have this in their carts

Add to cart

Provided by Yiwu Xinrui. Ships from Temu.

Free shipping on all orders

Delivery: 6-16 business days

Get a 10.00лв. credit for late delivery

Courier company: M&B Express speedy Express One Econt

Free returns • Price adjustment >

Sustainability at Temu (4M+ trees) >

3,49лв. -65% 9,99 All taxes included

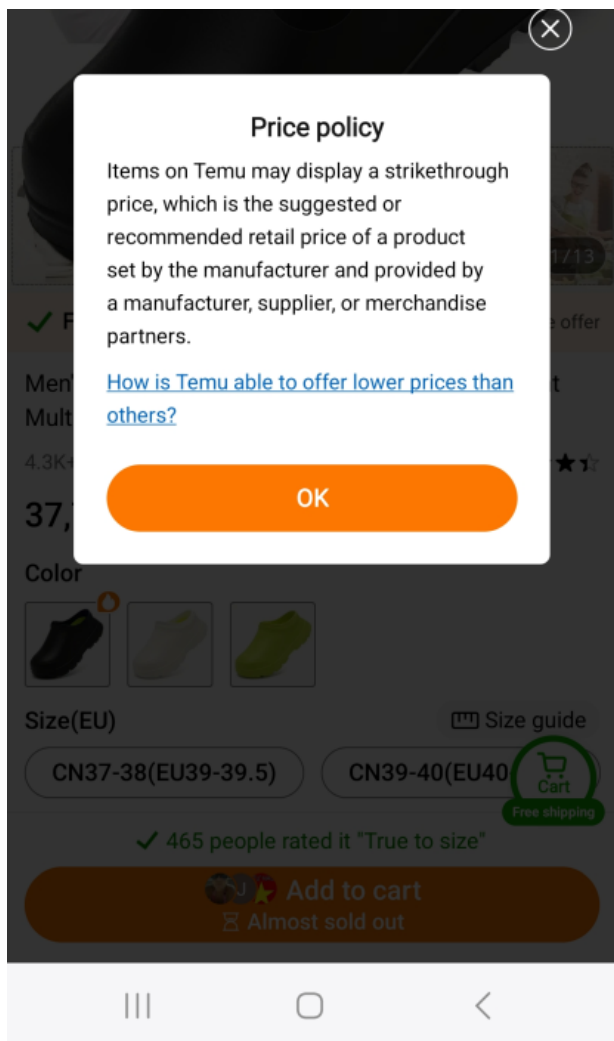
Items on Temu may display a strikethrough price, which is the suggested or recommended retail price of a product set by the manufacturer and provided by a manufacturer, supplier, or merchandise partners.

[How is Temu able to offer lower prices than others?](#)

Limited-ti

Hurry ! Over 999 people have this in their carts





## Romania

Dronele Pliabile XKRC X6 Cu Cameră, Baterii, Evitare  
Obstacole, Mod Gravitatie Și Multe Altele - Vine Cu O  
Geantă De Transport!



36K+ vândute | Oferit de (100K+ vândute) > 4,5 ★★★★★

#6 Cel mai bine vândut în Drone și jucării zburătoare >

250,44Lei -47% 473,49

Produsele de pe Temu pot afișa un preț cu o linie tăiată, care reprezintă prețul sugerat sau recomandat pentru produs stabilit de producător și furnizat de către producător, furnizor sau partenerii noștri de produse.

[Cum este Temu capabil să ofere prețuri mai mici decât alții?](#)



Mesaje

Feedback

Adaugă în coș

Retururi gratuite

### Garanție serviciu

rambursare completă în 90 zile de la cumpărare.  
[Citește integral politica de retur >](#)

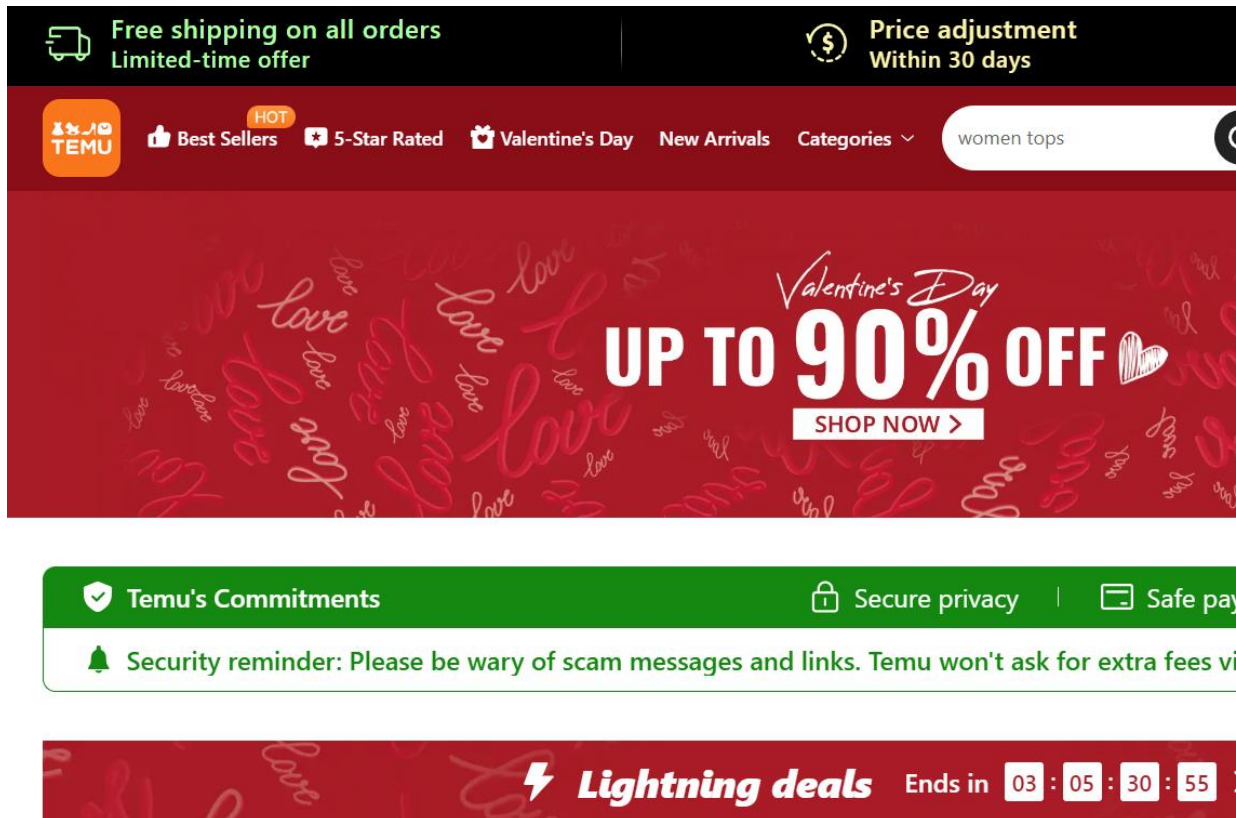
**Ajustarea prețurilor în termen de 30 zile**

- Articolele achiziționate de la Temu sunt eligibile pentru politica noastră de ajustare a prețurilor. Temu va oferi diferența de preț în cazul în care prețul de listă al articolului cumpărat a fost redus în termen de 30 zile de la cumpărare în aceeași țară sau regiune. Poți solicita o rambursare conform ajustării prețului selectând comanda respectivă din „Comenzile tale” și prin clic pe butonul „Solicită o ajustare de preț”.
- Este posibil ca articolele care sunt în curs de lichidare, în promoție sau care nu mai sunt disponibile etc. să nu fie eligibile pentru politica noastră de ajustare a prețului. Costurile, inclusiv, dar fără a se limita la costurile de livrare, sunt excluse de la orice calcul de ajustare a prețului. Temu își rezervă dreptul la interpretarea finală a politicii de ajustare a prețurilor, dreptul de a modifica termenii acestei politici în orice moment și dreptul de a refuza orice ajustare de preț la discreția noastră exclusivă.

## 2.2 Misleading urgency messages

### Examples to paragraph 2.2.2:


Bulgaria:





## Free shipping


- Free standard shipping on all orders.
- Get a 10,00лв. credit (standard shipping) for late delivery.
- Temu has order minimum thresholds, which allows us to offer a wider range of items for shipping, including smaller and more convenient sizes. Our order minimum thresholds are detailed before you submit your order.


OK


**Livrare gratuită pentru toate comenzile**  
Ofertă pe perioadă limitată


**Retururi gratuite**  
până la 90 de zile

**Obține aplicația Temu**




 Cele mai vândute


 Evaluat cu 5 stele


 Ziua îndrăgostiților


Noutăți


Categorii ▾




 Comenzi și cont



 RO

 Coș

Acasă > Jucării și jocuri > Drone și jucării zburătoare > Dronele Pliabile XKRC X6 C...



**XKRC**

**X6 PRO**

**Intelligent obstacle avoidance**


Dual cameras, simple and easy to control,  
for love to take off

1 Baterie

2 Baterii

3 Baterii

Cantitate  684 vândute în ultima săptămână

 Grăbește-te! Peste 77 persoane au acest articol în coșurile lor

### Livrare gratuită

- Livrare standard gratuită pentru toate comenzile.
- Primește un credit de 25,00Lei (expediere standard) pentru livrare întârziată.
- Temu are praguri de comandă minimă, ceea ce ne permite să oferim o gamă largă de articole pentru expediere, inclusiv dimensiuni mai mici și mai convenabile. Pragurile de comandă minimă sunt detaliate înainte să trimiți comanda.

OK

Examples to paragraph 2.2.5:

Bulgaria:

 Hurry ! Over 921 people have this in their carts

Romania



1 lampă de masă Big G Int...

**174,79Lei** 2.8K+ vândute

A mai rămas doar 1

★★★★★ (792)

Adaugă în coș




Suport Pentru Suport Pentr...

**2,26Lei** 35,99 745 vândute

 tocmai a fost achiziți...

★★★★★ (5.195)

Adaugă în coș

 Grăbește-te! Peste 200 persoane au acest articol în coșurile lor

## 2.3 Unclear presentation of price information

### Examples to paragraph 2.3.2:

#### Bulgaria:

Total (1 item) **3,67лв.**

All taxes included

30лв. Min. to checkout

Express checkout with **PayPal**

 Item availability and pricing are not guaranteed until payment is final.

## 2.4 Delayed and misleading information about the minimum order value

### Examples to paragraph 2.4.3

#### Bulgaria:

##### Order Summary

Item total: 11,99лв.

Item discount: -8,32лв.

---

Total (1 item) 3,67лв.

All taxes included

30лв. Min. to checkout

#### Free shipping

- Free standard shipping on all orders.
- Get a 10,00лв. credit (standard shipping) for late delivery.
- Temu has order minimum thresholds, which allows us to offer a wider range of items for shipping, including smaller and more convenient sizes. Our order minimum thresholds are detailed before you submit your order.

OK



### Livrare gratuită

- Livrare standard gratuită pentru toate comenzile.
- Primește un credit de 25,00Lei (expediere standard) pentru livrare întârziată.
- Temu are praguri de comandă minimă, ceea ce ne permite să oferim o gamă largă de articole pentru expediere, inclusiv dimensiuni mai mici și mai convenabile. Pragurile de comandă minimă sunt detaliate înainte să trimiți comanda.

OK



## Examples to paragraph 2.4.3

### Bulgaria:


<

Cart (1)

☰

✓ Free shipping and free returns

Limited-time



Ear Nose Hair Trimmer Hair Clippe...

By WHATOOK >

Black/1pc ▾

In 346 other carts

3,67лв.

11,99

- 1 +

① Item availability and pricing are not guaranteed until payment is final.

Item total:

11,99лв.

Item discount:

-8,32лв.

3,67лв.


Total

3,67лв.

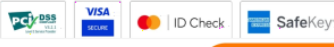
✓ Safe Payment Options

Temu is committed to protecting your payment information. We follow PCI DSS standards, use strong encryption, and perform regular reviews of its system to protect your privacy.

1. Payment methods



2. Security certification



out

✓ All

Total 3,67лв. ^

20лв. Min. to checko


<

Cart (1)

☰ Sign in

✓ Free shipping and free returns

Limited-time



Ear Nose Hair Trimmer Hair Clippe...

By WHATOOK >

Black/1pc ▾

In 346 other carts

3,67лв.

11,99

- 1 +

① Item availability and pricing are not guaranteed until payment is final.

① Can't find your items? [Sign in to check your cart >](#)

Item total:

11,99лв.

Item discount:

-8,32лв.

3,67лв.


Total

3,67лв.


✓ Safe Payment Options

Temu is committed to protecting your payment information. We follow PCI DSS standards, use strong encryption, and perform regular reviews of its system to protect your privacy.

1. Payment methods



2. Security certification



✓ All

Total 3,67лв. ^

Checkout (1)

Home > Cart

✓ Free shipping on all orders

Limited-time offer

✓ Select all (1)

☰



Ear Nose Hair Trimmer Hair Clipper Professional Painless Brow And Hair Trimmer Hair Removal ...

By WHATOOK >

Black/1pc >

Valentine's deal In 346 other carts

3,67лв.

-69%

11,99

Qty 1 ▾

Order Summary

Item total:

11,99лв.

Item discount:

-8,32лв.

Total (1 item)

3,67лв.

All taxes included

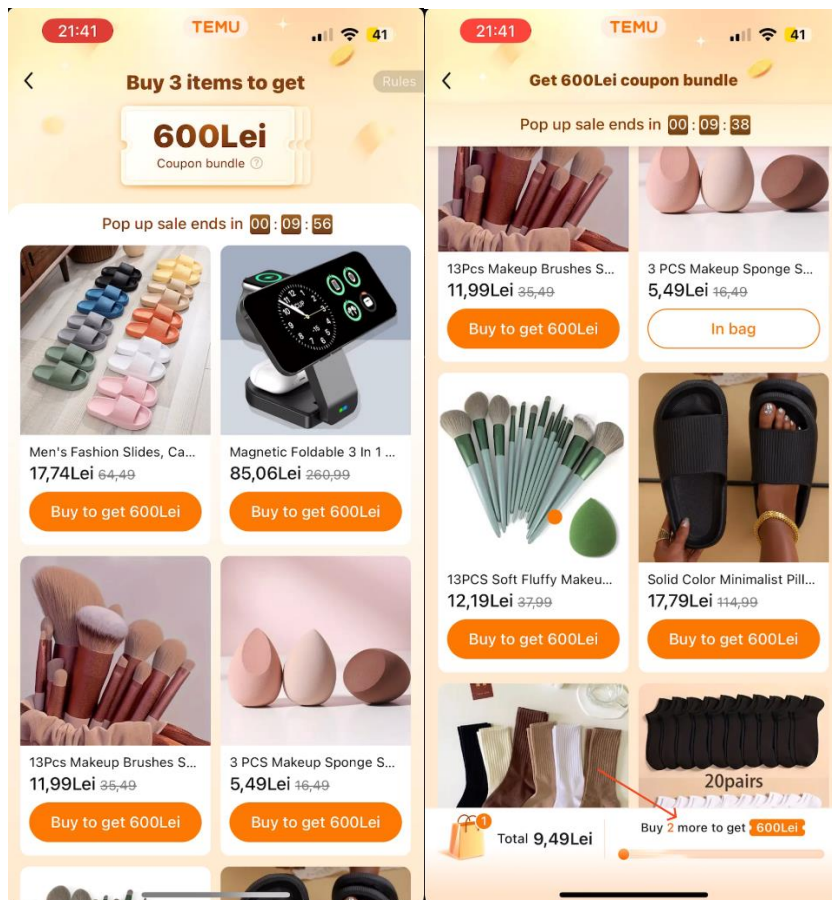
30лв. Min. to checkout

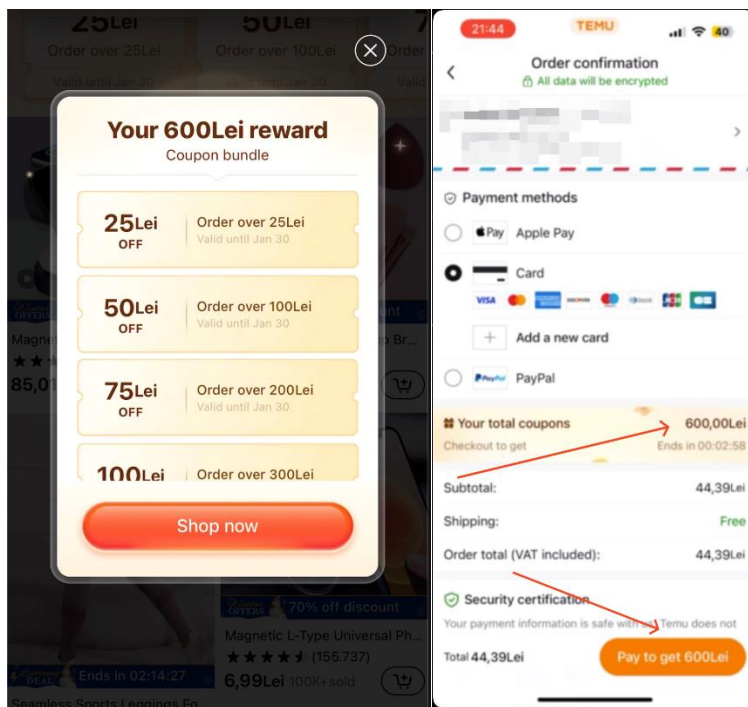
## 2.5 Misleading practices regarding coupons

### Examples to paragraph 2.5.1:

### Examples to paragraph 2.5.2:

Romania

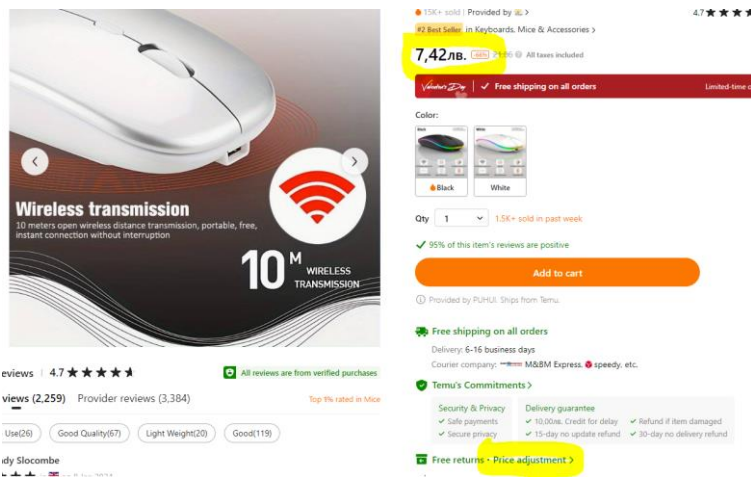




## 2.6 Misleading practices on price equalization and available cash on delivery guarantees

### Examples to paragraph 2.6.2:

#### Bulgaria:






## Examples to paragraph 2.6.4:

### Bulgaria:

#### Price Adjustment within 30 days

- Items purchased from Temu are eligible for our price adjustment policy. Temu will provide the price difference if the list price of the item purchased was reduced within 30 days of purchase in the same location. You can request a price adjustment refund by selecting the relevant order in 'Your Orders' and clicking on the 'Request a price adjustment' button.
- Items that are on clearance, promotions or no longer available, etc. may not be eligible for our price adjustment policy. Fees, including but not limited to shipping fees, will be excluded for any price adjustment calculation. Temu reserves the right to the final interpretation of our price adjustment policy, the right to modify the terms of this policy at any time, and the right to deny any price adjustment at our sole discretion.

ss,  speedy, etc.

- ✓ Refund if item damaged
- ✓ 30-day no delivery

5) >

**Examples to paragraph 2.6.5:**

## 2.7 Lack of specific information requirements for contracts concluded on online marketplaces

### Examples to paragraph 2.7.2:

#### Bulgaria:

🔥 100K+ sold Provided by ➡ 4.3 ★ 1

#1 Top Rated in Shave & Hair Removal >

7,47лв. -25% 9:99 All taxes included

Valentine's Day | ✓ Free shipping on all orders Limited

Quantity:

🔥 4 Blades 16 Blades 12 Blades 8 Blades

Qty 1 18K+ sold in past week

🚚 Hurry! Over 999 people have this in their carts

Add to cart

⌚ Provided by Jingyi beauty selection. Ships from Temu.

Jing yi Jingyi beauty selection  
Joined 9 months ago

613 Followers 100K+ Sold 2 Items

Follow

13,351 reviews | 4.3 ★★★★★ >

de\*\*\*7 on 8 Feb 2024 ★★★★★  
excellent shaving blades, just as good as Gillette

ma\*\*\*73 on 5 Feb 2024 ★★★★★  
Perfect!!!!!! perfectly compatible with the Gillette fusion razor.  
Plastic material slightly thinner

adm\*\*\*5 on 3 Feb 2024 ★★★★★  
It's ok. She matches Gillette and laughs well. Thank!

Items Shave & Hair Removal Reviews(4.3★)

Search all 2 items

2 items

Sort by Relevance

12

12

#### Romania

Fără Fir Detașabilă Husă Ultra-subțire Cu Mai Multe Unghiuri Cu Suport Pentru Creion, Pentru Husă Pentru Tastatură iPad 7 8 A 9-a

140 vândute | Oferit de ➡ (1.7K+ vândute) > 4,4 ★★★★★ 1

222,44Lei -39% 366,99

✓ Transport gratuit pentru tine Ofertă pe perioadă limitată

Culoare: negru

Cantitate 1 Aproape vândut

✓ Adăugați acest element la Bucurați-vă de transport gratuit și returnări gratuite!

Adaugă în coș

⌚ Furnizat de Top Keyboard Case. Expediat din Temu.

12

12

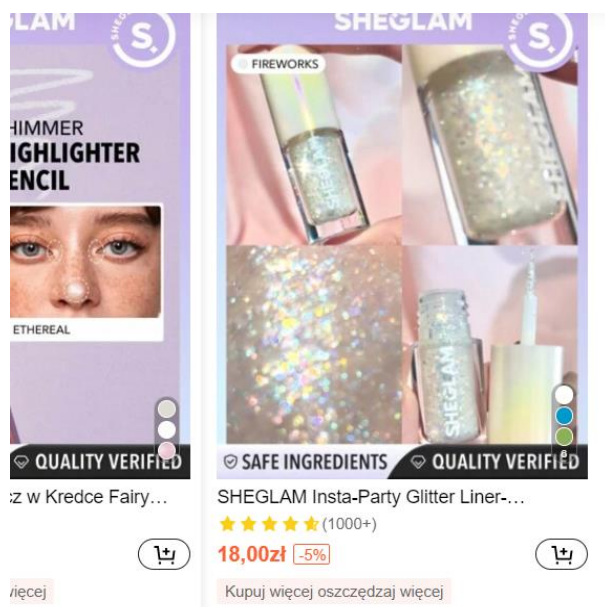
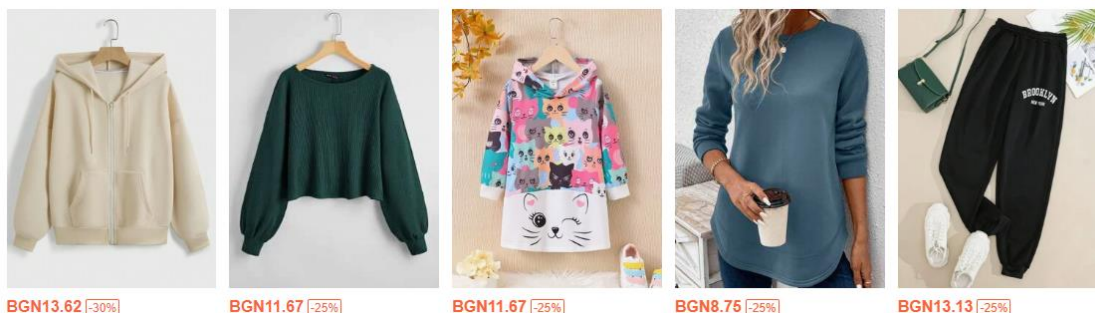


### 3 Shein

#### 3.1 Non-compliance with price reduction announcement rules

##### Examples to paragraph 3.1.1

##### Bulgaria:





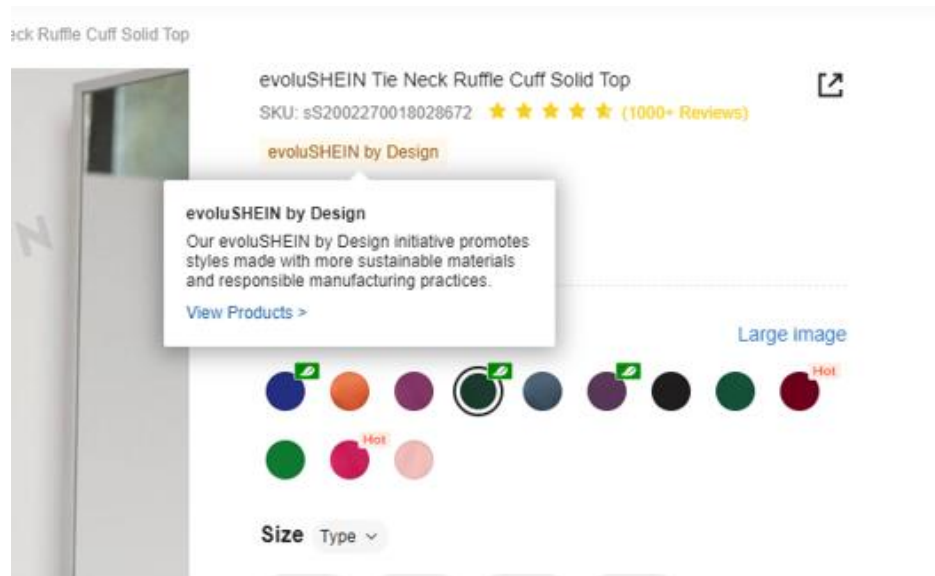
### Bulgaria:

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### 3.3 Unsubstantiated environmental claims "greenwashing"

#### Examples to paragraph 3.3.2

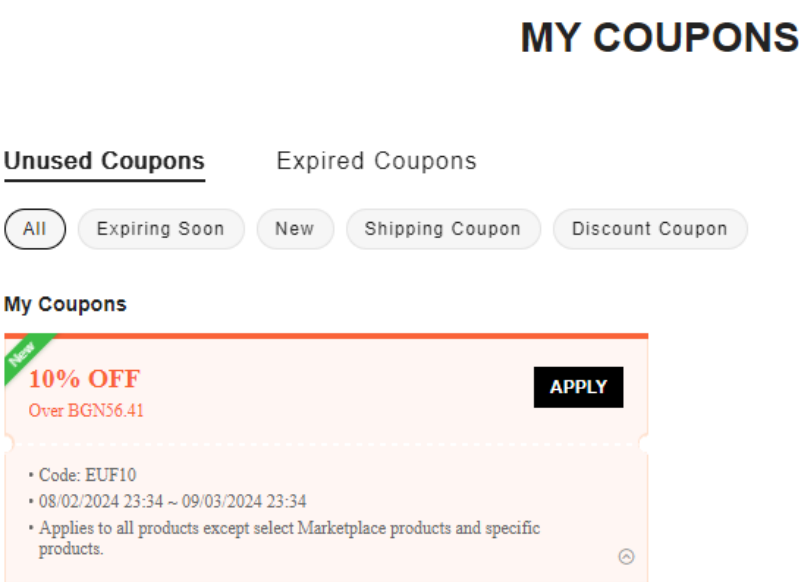
##### Bulgaria:



3.4 Unclear rules and inability to use coupons

Examples to paragraph 3.4.1

Bulgaria:



Examples to paragraph 3.4.2:

Bulgaria:

**Order Summary**

Retail Price:	BGN27.23
Subtotal:	BGN20.62
Shipping fee:	FREE
<b>Grand Total:</b>	<b>BGN20.62</b>
Reward 11 SHEIN Points	

**Coupon Code**

[My Coupons](#)

euf10 **Apply**

Coupons do not meet the minimum amount requirements

Apply code **euf10** to get **Extra 10% off** for your first order.