

## ContextLogic Holdings Inc. Website Privacy Notice

Effective Date: August 2025

This Privacy Notice describes how ContextLogic Holdings Inc. (“ContextLogic”) collects, uses, shares, and protects personal data gathered through the ContextLogic websites (the “Website”).

In some cases, ContextLogic may issue more specific privacy notices for some products, services, or geographies, and you will be informed of these notices, if they apply. This Privacy Notice does not pertain to ContextLogic employees or job applicants.

### ContextLogic’s Use of Personal data

ContextLogic serves as the data controller (the entity responsible for processing your personal data) for this Website.

ContextLogic may collect, process, store, and share your personal data throughout the course of our relationship with you. The types of personal data we collect and the ways we use, store, and share that information depend on the nature and circumstances of our relationship with you and how you interact with our Website.

#### *Personal Data We Collect*

The personal data we collect depends on the context of your interactions with our Website and the services you use. This information includes:

- **Identifiers** such as your name, email addresses, or other addresses or numbers at which you can receive communications, and your online or device identifiers, including your Internet Protocol (“IP”) address.
- **Internet or other electronic network and device activity** such as information about your interactions with our Websites, including data from cookies, pixel tags, local storage, and other similar technologies.
- **Contents of Communications** that you submit via the Website.

#### *How We Collect Personal data*

We collect personal data through three primary methods: information you provide to us, information we collect automatically, and information from third parties.

- **Information you provide to us:** Information may be collected when you submit it through forms on the Website or interact with us.
- **Information we collect automatically:** From the devices you use to access the Website, which may provide information to us, including the model, operating system and version, the name of the domain from which you access the Internet, your IP address, and other unique device identifiers.
- **Information from third parties:** From our vendors and service providers, such as our web hosting providers, who may provide us with information about you or your use of the Website.

#### *How We Use Personal data*

ContextLogic may use the personal data we collect for the purposes described below, which purposes are reasonably necessary to fulfill the legitimate business and legal obligations set forth herein:

- To provide customer service and respond to inquiries.
- To operate, maintain, and improve the Website.
- To maintain the rights, safety, and security of ContextLogic, the Website, our products, databases, and other technology assets.
- To detect, prevent, or otherwise address fraud, security, or technical issues.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which personal data held by us is among the assets transferred.
- To respond to law enforcement requests and as required by applicable law, court or other lawful order, or governmental regulations, including our transparency reporting obligations.
- As otherwise described to you at the time your personal data is collected, or with your consent.

#### *How We Share Personal data*

ContextLogic may share your personal data with third parties for the following purposes, subject to appropriate contractual safeguards and in accordance with applicable data protection law:

- With service providers who perform a variety of services and functions for us, such as data storage, delivery, financial, regulatory, safety, and legal services. Your information will only be shared subject to an agreement with ContextLogic that permits the service provider to use your information only to provide the agreed services on our behalf.
- With our affiliates and subsidiaries who may use the personal data for the purposes described in this Privacy Notice.
- With a business transition partner in the event we go through a business transition such as a merger, acquisition by another company, bankruptcy, reorganization, or sale of all or a portion of ContextLogic's assets.
- With law enforcement or governmental agencies if we have a good-faith belief that disclosure of the information is reasonably necessary to comply with a court order, law, or legal process, including to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ContextLogic, our customers, or others.

#### *Disclaimer*

By providing my phone number to ContextLogic Holdings Inc., I agree and acknowledge that ContextLogic Holdings Inc. may send text messages to my wireless phone number for any purpose. Message and data rates may apply. Message frequency will vary, and you will be able to Opt-out by replying "STOP". For more information on how your data will be handled please see our privacy policy below:

#### *Privacy Policy*

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

#### *Web Technologies*

We use various technologies to collect and store information, including cookies, pixel tags, local storage such as browser web storage or application data caches, databases, and server logs (collectively, "Web Technologies") on our Website. These Web Technologies help us keep our Website stable, secure, and provide essential functionality.

Types of Web Technologies We Use:

- Technologies required for basic website functionality, security, and stability. These technologies are essential to the proper functioning of our Website and cannot be disabled.
- Technologies to help use remember your settings and preferences for future visits.

The Web Technologies are configured to collect the minimum amount of data necessary to achieve their limited purpose and are configured to only collect and use data for those purposes.

#### *Things We Don't Do: Selling or Sharing Personal Data, Processing Sensitive Information, or Profiling*

ContextLogic does not sell personal data for monetary or other valuable consideration. We also do not share personal data for behavioral advertising purposes, including cross-context behavioral advertising. We do not use sensitive personal data for inferring characteristics about individuals. ContextLogic does not use automated processing of personal data for profiling purposes.

#### *Links to Third Party Sites*

The Website may provide links to other websites or resources over which ContextLogic does not have control ("External Websites"). Such links do not constitute an endorsement by ContextLogic of those External Websites. ContextLogic provides these links to you only as a convenience, and ContextLogic is not responsible for the content of such External Websites. Your use of External Websites is subject to the terms of use and privacy policies located on those External Websites. We encourage you to read the privacy policy of any website that you visit before you provide any information to the operator of that website.

#### **Legal Basis for Processing**

ContextLogic will only process (i.e., use) your personal data when the law allows us to, that is, when we have a legal basis for processing.

We use your personal data in the following circumstances:

- **Legal or regulatory obligation:** where needed to comply with a legal or regulatory obligation that we are subject to.
- **Legitimate interests:** where necessary for our interests (or those of a third party), provided that your fundamental rights do not override such interests. We make sure we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests.
- **Consent:** where you provided your knowing and voluntary consent to processing your personal data.

Where ContextLogic processes your personal data for our legitimate interests, we do not use your personal data for activities where the impact to your interests overrides our interests.

Where processing is based on consent, you have the right to withdraw your consent at any time without penalty. When you withdraw your consent, we will stop the data processing.

#### **Purpose Limitation and Data Integrity**

ContextLogic will only process personal data in a way that is compatible with and relevant to the purpose for which it was collected or authorized by you, or as we notify you if these purposes change. You have the right to object to or request that we restrict the processing of your personal data for such additional or new purposes. ContextLogic will take reasonable steps to ensure that personal data is accurate, complete, current, secure, and reliable for its intended use.

#### **Data Retention Period**

ContextLogic will keep your personal data for as long as is reasonably necessary for the purpose of the processing or as otherwise required by law.

#### **Security**

ContextLogic will take reasonable steps to ensure that personal data is accurate, complete, current, secure, and reliable for its intended uses. We employ procedural and technological security measures that are designed to protect your personal data from loss, unauthorized access, disclosure, alteration, or destruction. However, please

remember that no method of transmission over the internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security.

### **Your Privacy Rights**

Some privacy laws provide certain rights to individuals regarding their privacy and their personal data. ContextLogic respects your rights concerning your personal data.

In accordance with applicable laws, you may have the right to:

- Request information about the entities with which ContextLogic has shared your personal data.
- Request access to or receive a copy of your personal data.
- Request correction of inaccurate, incomplete, or out-of-date personal data.
- Request restriction of the processing of your personal data.
- Object to or withdraw your consent of ContextLogic's processing of your personal data.
- Request the anonymization or deletion of your personal data.

### *Exercising Your Rights*

You may, without charge, request to exercise any of your rights at any time by emailing us at [compliance@contextlogic.com](mailto:compliance@contextlogic.com)

To protect you and your personal data, requests must:

- Provide sufficient information for us to reasonably verify you are the person or an authorized representative of the person whose personal data is the subject of the request; and
- Describe your request with sufficient detail for us to properly understand, evaluate, and respond to it.

If you use an authorized agent to submit a request on your behalf, we may verify both your and your agent's identities as well as documentation authorizing your agent to act on your behalf. We will only use personal data collected during the verification process to verify your identity or your agent's authority to make the request on your behalf.

### *Non-Discrimination*

ContextLogic does not discriminate against individuals who exercise their rights under applicable law.

### **International Data Transfers**

At times, your personal data may be transferred to other ContextLogic affiliates, service providers, or systems in countries that may not offer a level of data protection equivalent to that in your country, including the United States. Where such transfers occur, ContextLogic complies with the cross-border data transfer and export control laws of the countries in which it operates.

### **Children's Privacy**

This Website is not intended for children under the age of 18. ContextLogic does not knowingly collect personal data via this Website from children under the age of 18 without the consent of the child's parent or guardian. If ContextLogic becomes aware that we inadvertently collected such information, we will promptly delete and/or destroy it upon being made aware of the collection.

### **Privacy Notice Updates**

ContextLogic may need to update this Privacy Notice on occasion. If we update this Privacy Notice, we will post the updated Privacy Notice on our Website and update the effective date. We encourage you to regularly visit this Privacy Notice to ensure that you are aware of our current practices with respect to your personal data.

### **Questions & Contacting Us**

If you have any questions regarding this Privacy Notice, please contact us via email at [legal@contextlogic.com](mailto:legal@contextlogic.com).

You may lodge a complaint with the appropriate Data Protection Authority for your jurisdiction if you have concerns about our practices regarding the processing of personal data. If you are in the EEA, you can find your Data Protection Authority here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)