

Yahoo! Inc.

Safe Harbor Privacy Policy for HR Personal Data

Yahoo! Inc. ("Yahoo!") adheres to the Safe Harbor program requirements established by the U.S. Department of Commerce with respect to human resource personal information for employees and other individuals who provide services to Yahoo!'s affiliates and subsidiaries in the EU ("European Union") and European Economic Area ("EEA") received by Yahoo! (the "EU HR Personal Data"). Yahoo! adheres to the Safe Harbor Principles, as described in the Safe Harbor Privacy Policy (the "Privacy Policy") below.

The Privacy Policy

NOTICE: Yahoo! receives, processes and uses EU HR Personal Data and transfers EU HR Personal Data to third parties to carry out Yahoo!'s obligations under employment and benefit laws, to administer participation in Yahoo!'s benefit, compensation and human resource plans and programs, for performance management, for compliance and discipline reporting and investigation and purposes for which Yahoo! has otherwise provided notice to data subjects. In the event that Yahoo! discloses EU HR Personal Data (1) to a third party, other than a third party that is acting as an agent or processor to perform task(s) on behalf of and under the instructions of Yahoo!, or (2) for a purpose that is incompatible with the purpose(s) for which the EU HR Personal Data was originally collected or subsequently authorized by the Employee, Yahoo! takes reasonable precautions to provide notice prior to the disclosure. Such notice will cover the following items: (a) the purposes and uses for which EU HR Personal Data is being collected, (b) how to contact Yahoo! with any inquiries or complaints, (c) the types of third parties to which Yahoo! discloses the information, and (d) the choices and means Yahoo! offers individuals for limiting the use and disclosure of the EU HR Personal Data.

CHOICE: In the event that Yahoo! discloses EU HR Personal Data (1) to a third party, other than a third party that is acting as an agent or processor to perform task(s) on behalf of and under the instructions of Yahoo!, or (2) for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the Employee, Yahoo! takes reasonable precautions to offer data subjects the opportunity to choose not to have such EU HR Personal Data disclosed. In the case where the EU HR Personal Data referenced in the previous sentence pertains to sensitive information (i.e., personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual), Yahoo! takes reasonable precautions to offer an affirmative or explicit (opt in) choice, to have the EU HR Personal Data disclosed.

ONWARD TRANSFER: Yahoo! transfers EU HR Personal Data to third parties, including third parties located outside the EEA in countries that have been deemed by the European Commission as not having sufficient privacy laws or protections, that act as agents or processors to perform task(s) on behalf of and under the instructions of

Yahoo!, after Yahoo! takes reasonable precautions to either (1) ascertain that the third party complies with the Directive¹ by adhering to an adequacy finding from the EU, or (2) obtain a written agreement whereby the third party represents that it provides at least the same level of privacy protection as is required by the relevant Safe Harbor Principles.

SECURITY: Yahoo! takes reasonable precautions to protect EU HR Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

DATA INTEGRITY: Yahoo! takes reasonable precautions to not process EU HR Personal Data in ways that are incompatible with the purposes for which it has been collected or subsequently authorized. To the extent necessary for those purposes, Yahoo! will take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current.

ACCESS: Upon request, data subjects will have access to their EU HR Personal Data held by Yahoo! and may correct, amend, or delete their EU HR Personal Data held at Yahoo! if it is inaccurate. However, access to such EU Personal Data may be denied, when the burden or expense of providing access would be disproportionate to the risks to the data subject's privacy in the case in question, or where the rights of persons other than the data subject's would be violated.

ENFORCEMENT: Yahoo! has established a program to monitor its adherence to the Principles and to address questions and concerns regarding its adherence to the Principles. Yahoo! encourages interested person to raise any concerns using the contact information below. With respect to any dispute relating to this Privacy Policy or the Principles that cannot be resolved through our internal complaint process, we will cooperate with the competent EU data protection authorities and comply with the advice of such authorities. In the event that we or such authorities determine that we did not comply with this policy, we will take appropriate steps to address any adverse effects and to promote future compliance. Any Yahoo! employee who does not follow this Privacy Policy will be disciplined, as determined by Yahoo! in its sole discretion and in compliance with applicable law.

Employees who have a complaint or question regarding this Privacy Policy may be directed to Tim Slaughterbeck via email: tslaught@yahoo-inc.com or phone: 408-910-1880.

¹ The "Directive" refers to Directive 95/46/EC of the European Parliament and the Council of 24 October 1995 on the protection of individual with regard to the processing of personal data and on the free movement of such data.