

## **RELX GROUP SAFE HARBOR PRIVACY POLICY**

*(Last updated June 1, 2015)*

The following RELX Group entities in the United States (“Participants,” “we” or “our”) have certified to the U.S.-EU Safe Harbor Framework and U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal data from European Union member countries and Switzerland:

- Accuity Inc.
- LexisNexis Legal & Professional, a division of Reed Elsevier Inc.
- Lexis Managed Technology Services, a business of LexisNexis, a division of Reed Elsevier Inc.
- LexisNexis Risk Solutions, operating through LexisNexis Risk Holdings Inc. and LexisNexis Risk Data Management Inc. and their subsidiaries
- Moreover Technologies, Inc.
- Reed Elsevier Technology Services, a division of Reed Elsevier Inc. (“RETS”)
- WorldCompliance Inc.

The Participants have adopted this Safe Harbor privacy policy (“Policy”), which is based on the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor program, and to view the Participants’ certifications, please visit <http://www.export.gov/safeharbor>. Participants’ adherence to the Principles may be limited to the extent necessary to comply with legal obligations, law enforcement requirements or other recognized exceptions to the Principles.

### **SCOPE OF THIS POLICY**

This Policy applies only to personal data that Participants receive from the European Economic Area (“EEA”) and Switzerland as described in their respective certifications.

### **PRIVACY PRINCIPLES**

**NOTICE:** When Participants collect personal information directly from individuals in the EEA and Switzerland, Participants seek to inform such individuals about the purposes for which we collect and use personal information about them, how to contact us with any questions or complaints (see below), the types of third parties to which we disclose the information, and the choices and means, if any, we offer for limiting the use and disclosure of the information. When Participants receive personal information from RELX Group entities, corporate customers, business partners, data providers and other entities in the EEA or Switzerland, the Participants will use and disclose such information in accordance with the notices provided by such entities and the choices made by the individuals to whom such personal information relates.

**CHOICE:** It is our policy to provide individuals with clear and conspicuous, readily available, and affordable mechanisms to exercise choice. We offer individuals the opportunity in appropriate circumstances to choose whether their personal information subject to this Policy is: (a) to be disclosed to a third party (other than our agents and contractors or when required by law or legal process) or (b) to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the individual. In the case of sensitive personal information (specifying racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and health or sex life), Participants exercise special precautions and safeguards.

**ONWARD TRANSFER:** Our disclosure of personal information to third parties will be done in compliance with the notice and choice principles above, where applicable. In the event that we disclose personal information to our agents, contractors or other entities where we have a business relationship, it is our policy to seek to either enter into a written agreement with the third party requiring that they provide at least the same level of privacy protection as is required by the Safe Harbor Privacy Principles or verify that the third party subscribes to the Safe Harbor Privacy Principles, is subject to the EU Data Protection Directive or other adequacy finding, or has other appropriate legal controls in place to safeguard the personal information.

**SECURITY:** We use a variety of data security measures intended to ensure the confidentiality and integrity of an individual's personal information and to protect it from loss, misuse and unauthorized access, disclosure alteration and destruction.

**DATA INTEGRITY:** We strive to ensure that data is relevant for the purposes for which it is to be used, reliable, relevant for its intended use, accurate, complete, and current.

**ACCESS:** Where appropriate, we provide individuals with reasonable access to personal information about them and to allow individuals to correct, amend, or delete that information where it is inaccurate, subject to certain exceptions.

These include:

- access to confidential or proprietary information;
- situations in which granting access might have to be balanced against the privacy interests of others;
- where we maintain the information solely as a data processor, in which case requests may need to be directed to the data controller of the information; or
- where the data requested relates to an investigation, proceeding, litigation or potential litigation.

**ENFORCEMENT:** Participants take steps internally to verify that our privacy promises have been implemented as presented and take appropriate steps to remedy any deficiencies that we may identify. If you have any questions or complaints regarding this Policy or any Participant's compliance with the Safe Harbor Frameworks, please contact us at: Privacy Manager, RELX Group, P.O. Box 933, Dayton, Ohio 45401, USA; Telephone: +1-800-831-2578, Fax: +1-800-732-7672; Email: [privacy.information.mgr@reedelsevier.com](mailto:privacy.information.mgr@reedelsevier.com). If the issue cannot be resolved through our internal processes, participants will cooperate with JAMS in accordance with the JAMS Safe Harbor Program, which is described on the JAMS website at <http://www.jamsadr.com/safeharbor>.