

February 16, 2009

Hay Group Insight

Safe Harbor Privacy Policy



Overview

The following document describes the Hay Group Insight (the “Company”) Safe Harbor Privacy Policy (the “Policy”). Hay Group Insight’s Safe Harbor Privacy Policy demonstrates our commitment to the privacy of all personal information of our customers, employees, and others, entering into the United States from the European Economic Area. Hay Group Insight has certified itself and agreed to the privacy procedures that are consistent with the U.S.-EU Safe Harbor Principles, and with the EU Directive on Data Protection 95/46/EC.

Definitions

For the purpose of this Policy, the following definitions apply:

“Hay Group Insight” means the business division of Hay Group, Inc. that conducts employee and customer surveys.

“Personal Information” means any information or set of information that identifies or is used by a person to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public personal information.

“Sensitive Personal Information” means personal information that confirms or reveals race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union memberships, or that concerns an individual’s health or sex life.

NOTICE: Where Hay Group Insight collects Personal Information directly from individuals in the EU, it will inform them about the type of Personal Information collected, the purposes for which it collects and uses the Personal Information, how to contact the Company with any inquiries or complaints, and the types of third parties to which the Company discloses or may disclose that information, and the choices and means, if any, the Company offers individuals for limiting the use and disclosure of their Personal Information.

CHOICE: The Company will offer individuals the opportunity to choose (opt-out) whether their Personal Information is (a) to be disclosed to a third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. Individuals will be provided clear and conspicuous, readily available, and affordable mechanisms to exercise choice.

For Sensitive Personal Information, the Company will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

The Company will provide individuals with reasonable mechanisms to exercise their choices.

TRANSFERS TO THIRD PARTIES: The Company will obtain assurances from their agents and third party providers that they will safeguard Personal Information consistently with this Policy. Where the Company becomes aware that an agent is using or disclosing Personal Information in a manner contrary to this Policy, the Company will take reasonable steps to prevent or stop the use or disclosure.

SECURITY: The Company will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

DATA INTEGRITY: The Company will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. The Company will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete, and current.

ACCESS AND CORRECTION: Upon request, the Company will grant individuals reasonable access to Personal Information that it holds about them. In addition, the Company will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate or incomplete.

ENFORCEMENT: The Company will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee that the Company determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

DISPUTE RESOLUTION: Any questions or concerns regarding the use or disclosure of Personal Information should be directed to the Company's corporate office at the address given below. The Company will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between the Company and the complainant, the Company has agreed to participate in the dispute resolution

procedures of the panel established by the European data protection authorities to resolve disputes pursuant to the Safe Harbor Principles.

Limitation on application of principles

Adherence by the Company to these Safe Harbor Principles may be limited (a) to the extent required to respond to a legal or ethical obligation; and (b) to the extent expressly permitted by an applicable law, rule or regulation.

Contact information

Questions or comments regarding this Policy should be submitted to the following person by mail as follows:

Hay Group, Inc.
100 Penn Square East
Philadelphia, Pennsylvania 19107-3388
Attention: General Counsel
Fax: 215-861-2119

Changes to this Safe Harbor Privacy Policy

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. A notice will be made available upon request.

Effective date

February 16, 2009.