

# FEDERAL-MOGUL CORPORATION

## SAFE HARBOR DATA PRIVACY POLICY

Federal-Mogul Corporation, its subsidiaries and its affiliates, respect the privacy of their customers, suppliers, employees and other persons with whom they deal in connection with their business operations. For this reason, Federal-Mogul Corporation and its affiliated U.S. entities (“Federal-Mogul”) have adopted this Safe Harbor Data Privacy Policy in compliance with the Safe Harbor Principles published by the U.S. Department of Commerce (“Principles”) with respect to personal data transferred from the European Union to the United States of America. In addition, Federal-Mogul complies with the U.S. EU Safe Harbor Framework and the U.S. Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Federal-Mogul has certified that it adheres to 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 Federal-Mogul’s certification, please visit <http://www.export.gov/safeharbor/>.

### **NOTICE**

Federal-Mogul receives information from individuals in a variety of situations. For example, individuals may provide Federal-Mogul with personal data so they can (1) receive information regarding our products, (b) be considered for employment, promotions or reassignment within Federal-Mogul or (3) engage in business transactions with Federal-Mogul. We will use the information provided for the purposes for which it was collected.

### **CHOICE**

Federal-Mogul does not share an individual’s personal information with any companies outside of the Federal-Mogul group of companies (which includes its subsidiaries and joint ventures throughout the world, hereinafter referred to as the “Federal-Mogul Group”) except as permitted by the Safe Harbor. Certain types of information (for example, resumes from individuals seeking employment) may be shared within the Federal-Mogul Group since we presume that individuals may be interested in any employment opportunities that may arise. Federal-Mogul will provide individuals the opportunity to choose (opt-out) whether their personal information can be used for purposes other than the purpose for which it was originally furnished.

With respect to “Sensitive Information” (i.e., information that reveals race, ethnic origin, political opinion, religious beliefs, union membership or that relates to health or sexual preferences) Federal-Mogul will not share such information unless specifically authorized by the individual to which the information pertains.

### **ONWARD TRANSFER**

Prior to transferring personal information within the Federal-Mogul Group, Federal-Mogul will confirm that such information will receive the safeguards provided by this Safe Harbor Policy. Federal-Mogul believes that adequate safeguards are in place if the recipient of the personal information is (1) bound by contract to provide the same level of protection as is offered by this

Safe Harbor Policy; (2) bound by the Safe Harbor Principles; (3) subject to the European Directive; or (4) subject to another European Commission adequacy finding. If Federal-Mogul discovers that the recipient is not abiding by its privacy obligations, it will take commercially reasonable steps to prevent such breach.

## **SECURITY**

Federal-Mogul will take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

## **DATA INTEGRITY**

Federal-Mogul will process personal information only in a way that is compatible with the purposes for which it was collected or subsequently authorized by the individual. Furthermore, Federal-Mogul will take reasonable steps to ensure that personal data is reliable for its intended use, accurate, complete and current.

## **ACCESS**

Federal-Mogul will provide individuals with (1) reasonable access to personal information that it holds about them and (2) the reasonable ability to correct, amend, or delete that information where it is inaccurate or incomplete.

An individual who has any questions about this Safe Harbor Policy, or who wants access to his or her personal information should contact the Federal-Mogul Privacy Office as indicated below:

Federal-Mogul Privacy Office  
26555 Northwestern Highway  
Southfield, MI 48033  
Facsimile (248) 354 8103  
Federal-MogulPrivacyOffice@federalmogul.com

## **ENFORCEMENT**

Federal-Mogul assures compliance with its Safe Harbor Policy by (1) conducting compliance audits not less than annually; (2) providing a dispute resolution procedure to individuals who feel their privacy rights have been violated; and (3) subjecting its employees who violate this Policy to discipline.

## **DISPUTE RESOLUTION**

Any individual who has a question about this Policy, or who feels his or her privacy rights may have been violated, should contact Federal-Mogul's Privacy Office identified above. Federal-Mogul will investigate and if necessary, try to resolve any dispute informally with the aggrieved individual. If the dispute cannot be resolved informally, Federal-Mogul 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.

## **AMENDMENT**

Federal-Mogul may amend this Safe Harbor Policy from time to time by posting a revised policy on this web page. The amended policy will only apply to personal data previously collected to the extent the rights of individuals affected are not reduced. Federal-Mogul will only amend this Safe Harbor Policy in a manner consistent with the Safe Harbor Principles so long as it participates in the Safe Harbor framework.