

PRIVACY POLICY

Last updated March 29, 2007

Seagate Technology LLC ("Seagate", "we", "us", "our") appreciates the value of information and respects your right to privacy. We also understand the inherent privacy risks involved in using the Internet. We feel strongly about our own privacy when we visit web sites, subscribe to services, or download software. We want to provide the same privacy for you here that we want for ourselves when we visit other sites.

We have adopted this privacy policy ("Privacy Policy") to explain what information may be collected through this web site ("Site") and how such information may be used and/or shared with others. Please read this Privacy Policy carefully, because by using this Site you are acknowledging that you understand and agree to the terms of this Privacy Policy. We may from time to time modify this Privacy Policy, and the modified Privacy Policy will be effective upon posting. Please return to this page and check the "Last updated" date to make sure you understand and agree to the latest Privacy Policy. Your use of this Site constitutes your agreement to this Privacy Policy.

Note that this Privacy Policy applies solely to information collected through this Site and not through any other sources. This Privacy Policy is subject to the Terms of Use posted on this Site.

Your California Privacy Rights

The following only applies to California residents.

We may from time to time share your personally identifiable information with our subsidiaries, affiliates, sponsors, partners, advertisers or other third parties for their direct marketing purposes.

If you do not want us to share your personally identifiable information with such third parties for their direct marketing purposes, please let us know by e-mail at webmaster@seagate.com or by mail at Seagate Technology LLC, 920 Disc Drive, Scotts Valley, California 95066, Attention: Webmaster. Your opt-out request will be processed within 30 days of the date on which we receive it.

For more information on how your personally identifiable information is collected and used, please read the remainder of our Privacy Policy.

Children Under 13

This Site is not directed to children under 13. We do not knowingly collect personally identifiable information from anyone under 13 years of age, except for the limited circumstances described below. In the event a child under the age of 13 submits a question to us on this Site and identifies his or her age, we may use the child's e-mail address for the sole purpose of responding to the child's question on a one-time-only basis. However, we will not use the child's e-mail address to re-contact the child and we will delete it from our records once we have responded. If we become aware that we

have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records.

Your Information and How We Use It

This Site collects two types of information: (1) information that personally identifies you that you provide directly when you use various Seagate services or participate in various Seagate programs (such as your name and e-mail address); and (2) information that does not personally identify you that may be gathered by means such as analyzing page views and user navigation patterns (such as the number of users who log onto this Site on a daily basis).

Personally Identifiable Information

As a general policy, no personally identifiable information is automatically collected from your visit to this Site. However, in certain circumstances, you may be asked to provide us with some specific information about yourself in order to use certain features on this Site or to take advantage of certain opportunities that we may offer through this Site. For example:

- **Registration:** You do not need to register in order to access this Site. However, if you wish to use certain features of this Site or participate in certain programs offered through this Site, you may need to register. In order to register, you will be asked to create a user name and password, as well as provide certain personally identifiable information, such as your name, address, e-mail address and telephone number. In addition, there may be additional registration requirements in connection with a particular feature or program. We will use your e-mail address to provide you with the products and services that are offered in connection with the applicable features and/or programs for which you have registered, and, if requested, to provide customer service and technical support. We may also send you e-mails relating to technical issues in order to resolve a prior issue or to proactively notify you of technical or other issues that may affect you and/or your use of this Site. If you wish to update your account information, log into your account. If you forget your password, you can reset it via the registered user sign-in page. If you wish to cancel your registration, please let us know by e-mail at webmaster@seagate.com.
- **Purchase and Return:** If you purchase and/or return any products through this Site, you will be asked to provide your name, address, e-mail address, telephone number, credit/debit card information and billing information, as applicable. This information will be used to process your purchase order or return. We will also use your e-mail address to provide you with information and notices regarding your purchase or return.
- **Warranty and Product Registration:** If you purchase any products through this Site or through other means, you will have the option to register your product and/or product warranty through this Site by completing and submitting an online registration form. In order to complete the form and register your product or warranty, you will be asked to create a user name and password, as well as provide certain personally identifiable information, such as your name, e-mail address and telephone number. We will use your e-mail address to send you

information about product updates and additional compatible products or services that are offered, and, if requested, to provide customer service. In addition, we may use your personally identifiable information to provide you with information about your purchasing history.

- **Data Access and Storage:** If you purchase a product or service that permits Internet access to selected files stored online or on your storage device, on this Site or otherwise, you may be asked to open an online account in order to take advantage of our services (“Web Account”). To open a Web Account, you will be asked to provide your e-mail address and to create a password. You also may be asked to agree to certain other terms and conditions related to the service. If you wish to update your Web Account information, log into your account. If you forget your password, you can reset it via the member sign-in page depending on the specific service you signed up for.
- **Promotions, Sweepstakes, and Contests:** This Site may, from time to time, offer special promotions, sweepstakes and/or contests. If you choose to participate, you will be required to provide your name, address, e-mail address, and/or date of birth, as well as other information about you that is relevant to the specific promotion, sweepstakes or contest. Such information will be used to select the winners, to notify you if you win one of the sweepstakes and/or contests, and otherwise in connection with the administration of the promotion, sweepstakes or contest. We also reserve the right to share this information with any of the promotion, sweepstakes or contest sponsors or partners and use the information for any other purpose disclosed to you in the applicable terms and conditions or rules.
- **Newsletters and Information about Products, Services, Programs and Promotions:** If you wish to receive our online newsletter and/or information about our products, services, programs and promotions, you will be asked to provide your e-mail address.

Please note that any information you submit on this Site will be used (i) to authenticate your identity for access to our services and accessing shared files (if applicable), (ii) to carry out your requests and respond to your inquiries, (iii) in accordance with the terms set forth herein, and (iv) as otherwise disclosed at the point where such information is collected or in any additional terms and conditions applicable to the particular feature of this Site. Please also note that in order to carry out your requests, to make various features, services and materials available to you through this Site, and to respond to your inquiries, we may share your personally identifiable information with third parties that perform functions on our behalf (or on behalf of our partners), such as companies or individuals that analyze data, provide customer service, participate in or administer our promotions or provide marketing or promotional assistance (but such information will be shared only to the extent they need such information to perform their functions). Your personally identifiable information may also be used by us or shared with our subsidiaries, affiliates, sponsors, partners, advertisers or other third parties to provide you with product information and promotional and other offers. You may always direct us not to share your personally identifiable information with third parties, not to use your personally identifiable information to provide you with any such information or offers, or not to send you newsletters by sending us an e-mail at webmaster@seagate.com.

Except as provided herein, your personally identifiable information will not be provided to any third parties without prior approval from you.

Non-Personally Identifiable Information

From time to time we may collect general, non-personally identifiable, statistical information about the use of this Site, such as how many visitors visit a specific page on this Site, how long they stay on that page, and which hyperlinks, if any, they “click” on. We collect this information through the use of technologies such as “cookies” and “IP addresses”, which are discussed in greater detail below. We collect this information in order to determine which areas of this Site are most popular and to enhance this Site for visitors. From time to time we may also collect general, non-personally identifiable, statistical information about information and data stored and shared through the personal servers and the services we provide to support personal servers (“Web Service”). We may also group this information into aggregate data in order to describe the use of this Site to our existing or potential business partners, sponsors, advertisers or other third parties, or in response to a government request. However, please be assured that this aggregate data will in no way personally identify you or any other visitors to this Site.

- IP Addresses

An IP address is a unique number assigned to your computer when it accesses the Internet or another computer network. Web servers and network devices automatically identify your computer by its IP address. We collect IP addresses for purposes of system administration, to report aggregate information to our advertisers, and to track the use of this Site. When visitors request pages from this Site, our servers log the visitors’ IP addresses. It is not our practice to link IP addresses to anything personally identifiable, which means that a visitor’s session will be logged, but the visitor remains anonymous to us. However, we reserve the right to use IP addresses to identify a visitor only when we feel it is necessary to enforce compliance with this Site’s policies or to protect our services, members, this Site, or others.

- Cookies

Cookies are pieces of information that a web site transfers to a device accessing the Internet. Cookies make web-surfing easier for you by saving your preferences while you’re at this Site. Most web sites use cookies. By showing how and when visitors use this Site, cookies help us see which areas are popular and which are not. Information such as the total number of visitors and pages viewed is most easily tracked with cookies. We may use the information from cookies to make improvements and updates to this Site and to tailor our services to our visitors’ needs.

You always have the option of disabling cookies using your browser preferences. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or indicate when a cookie is being sent. If you want to know how to do this please look at the help menu on your browser. However, please be aware that some features of this Site may not function properly or may be slower if you refuse cookies. You may occasionally get cookies from our advertisers or other third parties with links on

this Site. We do not control these cookies. The use of advertising cookies sent by third-party servers is standard in the Internet industry.

We reserve the right to disclose any personally identifiable or non-personally identifiable information if we are required to do so by law or if we reasonably believe that such action is necessary in order to: (a) fulfill a government request; (b) conform with the requirements of the law or to comply with legal process served on us; (c) to protect or defend our legal rights or property, this Site, or its users; or (d) in an emergency to protect the health and safety of this Site's users or the general public.

Surveys

From time to time, we may conduct surveys on this Site. If you decide to participate, you may be asked to provide certain demographic information (such as your gender, date of birth and zip code). We may use the information that you submit, including your responses to the survey questionnaires, for the purpose(s) identified to you prior to your participation in the survey. In some cases, we may publish the results of the survey, but only as aggregate information. As we may be conducting certain surveys with our advertisers, sponsors or other third parties, we may also share the results of such surveys with such third parties, but in no event will the results personally identify you.

Choice

You can choose not to receive any newsletter, e-mail or other communication from us by (i) following the removal instructions in the communication that you receive, or (ii) e-mailing us at: webmaster@seagate.com. If you choose to e-mail us, please be sure to attach a copy of the unwanted communication.

Keeping Your Information Secure

We have reasonable and appropriate security measures in place to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your personally identifiable information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your personally identifiable information.

If you have registered on this Site or are a member of the Seagate Partner Program, access to your account will be protected by your password. We recommend that you do not disclose your password to any other person, that you choose at least 6 characters, including a combination of letters and numbers for your password, and that you change your password often. You are solely responsible for maintaining the confidentiality of your password and account, and are fully responsible for all activities that occur under your password or account. You may view and update your account information at any time by logging into your account. We will never ask for your password. If you ever receive an e-mail purporting to be from us asking for your password, ignore that request and forward the e-mail to us immediately.

Additional Information Regarding Personal Servers

Our “personal server” feature enables you to share files from your storage device over the Internet only with people you authorize. Authorized users have access only to those files you specifically designate. No one can access your files over the Internet without your permission. Folders that you enable for web access over the Internet can be accessed only by the owner of those folders - you - after you have authenticated yourself.

You connect with our servers during sign-in. After you have successfully signed in, you can view and download files that you have enabled for web access or that have been shared with you by other personal server owners.

We give you the option of creating private, password-protected folders and files on your personal server. Except as stated below, your files are stored only on your personal server, not on our servers, and only you and the people with whom you choose to share your files ever see your data. We do not keep records of your files on our servers nor do we track the sharing activity of your files.

We store the file directory of your personal server on our servers. You use this directory to navigate and select the files you want to view or download when you are away from your personal server. When you download a file from the Web Service, you are pulling the file directly from your personal server, not from our servers.

We also store some directory names (but not file names) in our secure data center in order to provide persistent share information and descriptions to your recipients.

The personal server service automatically times out signed-in users after a period of inactivity.

If we suspect that your account has been compromised or is being used suspiciously, we will deactivate the account and notify you. Notify us immediately by sending an e-mail to webmaster@seagate.com if you think your account has been compromised.

No one on the Internet can browse your personal server. You choose which files you want to share and you decide with whom to share them.

Keep in mind that any files or pictures you share using the personal server can be saved and forwarded by the people with whom you share them.

All data transmissions between your personal server and your authorized web users are protected by 128-bit SSL encryption. This ensures that information is private and cannot be tampered with during transmission.

Our service hardware is housed in a secure, access-controlled data center where each access is logged. Only authorized employees with a need for access are granted access.

Transfer of Assets

As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or substantially all of our assets, or assets related to this Site, personally identifiable information, non-personally identifiable information, and any other

information that we have collected about the users of this Site will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Other Sites

This Site may contain links to other web sites that we do not control or maintain. We are not responsible for the privacy practices employed by these other web sites. We encourage you to note when you leave this Site and to read the privacy statements of such other web sites before submitting any personally identifiable information.

Processing of Data Outside the EU

Given that we are an international business, our use of your information necessarily involves the transmission of data on an international basis (including the United States and countries outside the European Union).

Your Right to See Your Information

The following only applies to EU residents.

In addition to your normal access to your Web Account information, you have a right to see the personal information held about you. To obtain a copy of the personal information we hold about you, please send an e-mail to webmaster@seagate.com.

Contact Information

If you have questions or comments about our privacy policy please contact webmaster@seagate.com.

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