



European Union (“EU”) requirements for privacy and the protection of personal data. Among other things, it requires EU Member States to implement legislation that prohibits the transfer of personal data outside the EU, with exceptions, unless the European Commission (“EC”) has made a determination that the recipient jurisdiction’s laws ensure the protection of such personal data. This determination is referred to commonly

12. Through the means described in Paragraph 11, respondent represented, expressly or by implication, that it was a “current” participant in the U.S.-EU Safe Harbor