

SAFE HARBOR PRIVACY STATEMENT

Safe Harbor Standards

This Safe Harbor Privacy Statement (the "Statement") sets forth the privacy principles followed by all ARRIS Group Companies which are Safe Harbor certified in connection with the transfer and protection of "personal information" received from the European Union (EU) or Switzerland. All ARRIS Group Companies which are listed below have certified to Safe Harbor. Each reference to "ARRIS" in this Safe Harbor Privacy Statement means each ARRIS US Group Company that is Safe Harbor certified.

About The Safe Harbor

The "Safe Harbor" program was jointly established by the United States Department of Commerce and the European Commission, as a method for transferring personal information from the European Union (EU), to companies in the United States. A similar arrangement was later reached between the US Department of Commerce and the Information Commissioner of Switzerland, so that the Safe Harbor program now includes the U.S. - EU Safe Harbor Framework and the U.S. - Swiss Safe Harbor Framework. The Program is a voluntary self-certification process for companies operating in the United States. Companies that certify represent that they are upholding privacy standards for personal information received from the EU and Switzerland that have been accepted by the EU Commission, the Swiss Federal Data Protection and Information Commission and the US Department of Commerce. These standards exceed current US privacy standards. All ARRIS Group Companies which are listed below have certified to Safe Harbor and make that same representation.

"Personal Information" means information that can directly or indirectly lead to the identification of a living person, such as an individual's name, address, e-mail, telephone number, license number, medical identification number, photograph, or other identifying characteristic. The identification can occur by reference to one or more factors specific to the individual's physical, physiological, mental, economic, cultural or social identity. Personal information does not include information that has been anonymized, encoded or otherwise stripped of its identifiers, or information that is publicly available, unless combined with other non-public personal information.

Scope

This Statement governs personal information transferred from countries in the EU or Switzerland (which has adopted substantially similar privacy laws to those of the EU), to the United States on behalf of ARRIS. It applies to personal information in electronic and off-line formats.

Safe Harbor Privacy Principles

The following privacy principles apply to the transfer, collection, use or disclosure of personal information from the EU or Switzerland by ARRIS.

Notice: ARRIS informs individuals in the EU and Switzerland about the purposes for which it collects and uses their personal information, how to contact ARRIS, the types of third parties with which ARRIS

shares their personal information, and the choice and means ARRIS offers for limiting the use and disclosure of their personal information.

Consistent with the Safe Harbor requirements, ARRIS may not be in a position to furnish notice in certain limited situations. Specifically, notice is not required where the processing of EU or Swiss personal information is necessary to respond to a government inquiry; is required by applicable laws, court orders or government regulations; or is necessary to protect ARRIS's legal interests and providing notice would interfere with those interests.

Choice: ARRIS will not process personal information about EU or Swiss individuals for purposes other than those for which the information was originally obtained or subsequently authorized by the individual unless the individual affirmatively and explicitly consents ("opt-in") to the processing, or unless an exception applies. ARRIS also provides EU and Swiss individuals with the opportunity to withdraw consent at any time ("opt-out"), in which case their personal information will not be further processed. There are certain limitations on the right to opt-out, such as those that apply in the clinical research situation. In that situation, ARRIS can continue to rely upon personal information already provided by clinical research participants who choose to discontinue participation in a clinical trial, to the extent needed to protect the integrity of the study, but cannot collect any additional personal information about that individual once the written request to withdraw participation is received.

Data Integrity: ARRIS seeks to ensure that any personal information held about EU and Swiss individuals is accurate, complete, current and otherwise reliable in relation to the purposes for which the information was obtained. ARRIS collects personal information that is adequate, relevant and not excessive for the purposes for which it is to be processed. EU and Swiss individuals have a responsibility to assist ARRIS in maintaining accurate, complete and current personal information about them.

Transfers To Third Parties: ARRIS will only transfer personal information about EU and Swiss individuals to third-parties where the third-party (a) has provided satisfactory assurances to ARRIS that it will protect the information consistently with this Statement; or (b) is located in the EU, Switzerland or a country considered "adequate" for privacy by the EU or Swiss Commission, and therefore is required to comply with the EU or Swiss data protection laws or substantially equivalent privacy laws depending upon where the personal information originated ; or (c) the third-party has also certified to the Safe Harbor, and is accordingly independently responsible for complying with the Safe Harbor requirements.

Where ARRIS has knowledge that a third-party to whom it has provided EU or Swiss personal information is processing that information in a manner contrary to this Statement or the Safe Harbor requirements, ARRIS will take reasonable steps to prevent or stop the processing.

Access and Correction: Upon written request to ARRIS, ARRIS will provide EU and Swiss individuals with reasonable access to their personal information. ARRIS will also take reasonable steps to allow EU and Swiss individuals to review their information for the purposes of correcting their information. There are certain limitations to the Access and Correction rights, as set forth in the [US Department of Commerce's Safe Harbor](#) website.

Security: ARRIS takes reasonable precautions to protect EU and Swiss personal information in its possession from loss, misuse, unauthorized access, disclosure, alteration and destruction.

Enforcement: ARRIS has established internal mechanisms to verify its ongoing adherence to this Statement. ARRIS also encourages individuals covered by this Statement to raise any concerns about our processing of their personal information by contacting the ARRIS Legal Department. ARRIS will seek to resolve any concerns. ARRIS has also agreed to participate in the dispute resolution programs provided by the European Data Protection Authorities.

Limitation On Scope Of Principles: Adherence to these Privacy Principles may be limited to the extent required to meet a legal, governmental, national security or public interest obligation.

Contact Information: The ARRIS Group Companies which are listed below have certified to the Safe Harbor. If you have questions or comments about this Statement, write to the ARRIS Group Company responsible for the collection and/or processing of your personal information or call the telephone number provided below:

The current list of ARRIS US Group Companies which are Safe Harbor Certified includes:

1. ARRIS Group, Inc.
3871 Lakefield Drive
Suwanee, GA, USA 30024