

Schering-Plough Corporation US-EU Safe Harbor Privacy Statement

It is Schering-Plough's policy to respect and protect personally identifiable information collected or maintained by or on behalf of the Company. In furtherance of our commitment, Schering-Plough has certified to the US-EU Safe Harbor Agreement regarding human resources personal data collected in the European Economic Area (EEA). Schering-Plough adheres to the Safe Harbor privacy principles and Frequently Asked Questions, as agreed to by the U.S. Department of Commerce and the European Commission.

Scope

This Safe Harbor Statement sets forth the principles under which Schering-Plough manages the processing of human resources personal data residing in the EEA and the subsequent transfer of that data to the United States.

Definitions

The following terms are used throughout this document and are defined as follows:

Agent

"Agent" means any third party that processes personal data under the instructions of, and solely for, Schering Plough or to which Schering-Plough discloses personal data for use on Schering-Plough's behalf.

Schering-Plough

"Schering-Plough" means Schering-Plough Corporation, including its majority-owned subsidiaries that are incorporated in any state or territory of the United States.

Personal Data

"Personal data" means any information or set of information that identifies or can reasonably be used to identify a natural person. Personal data does not include publicly available data, anonymized data or data that is reported in aggregate.

Sensitive Personal Data

"Sensitive personal data" means personal data that reveals race, ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, any data that concerns health or sex life, or information relating to the commission of a criminal offense.

Privacy Principles

Notice: Schering-Plough notifies employees about the types of personal data it collects about them, the purposes for which it collects such data, and the types of third parties to which it discloses such data. Notice will be provided in clear and conspicuous language at the time of collection, or as soon as practicable thereafter, and before Schering-Plough uses or discloses the information for a purpose other than that for which it was originally collected.

Choice: In the event personal data are to be used for a new purpose incompatible with the purposes for which the data were originally collected or subsequently authorized or transferred to the control of a third party, employees are given, where feasible and appropriate, an opportunity to decline to have their data so used or transferred. In the event that the data used for a new purpose or transferred to the control of a third party are sensitive personal data, the employee's explicit consent will be obtained prior to the use or transfer of the data.

Onward Transfers: Schering-Plough will only transfer personal data to an Agent where the Agent has provided assurances that the Agent provides at least the same level of privacy protection as is required by these privacy principles. Where Schering-Plough has knowledge that an Agent is using or sharing personal data in a way that is contrary to these principles, the Schering-Plough will take reasonable steps to prevent or stop such processing. Schering-Plough will only transfer personal data to a non-agent third party where consistent with the notice provided to the individuals who are the subject of the data and any consent that those individuals have given.

Security: Schering-Plough takes reasonable and appropriate precautions to protect employees' personal data, whether stored in tangible hard-copy or electronic form, to prevent loss, misuse, or unauthorized access, disclosure, or destruction.

Access: Employees have reasonable access to their personal data and may request corrections, deletions, or additions, as appropriate, and except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy.

Data Integrity: Schering-Plough limits the collection, usage, and retention of information to that which is germane to the relevant purposes, and takes steps to ensure that any data are reliable for its intended use, accurate, complete and current.

Enforcement: Schering-Plough has put in place mechanisms to verify our ongoing compliance to these privacy principles. Any employee that violates these privacy principles will be subject to disciplinary procedures in accordance with Schering-Plough's Discipline policy.

Dispute Resolution: In case of disputes, employees are able to seek resolution of their questions or complaints through procedures that includes recourse to the Global Human Resources function in consultation with the Office of Global Privacy. The Company agrees to cooperate with the European Data Protection Authorities (DPAs) for the purpose of handling any unresolved complaints regarding human resources personal data.

Limitation on Scope of Principles

Adherence by Schering-Plough to these privacy principles may be limited to the extent required to meet legal, governmental, or national security obligations.

How to Contact Us

Please contact us with any questions concerning this Privacy Statement or any of our privacy practices at:

Schering Plough Corporation
Office of Global Privacy
2000 Galloping Hill Rd
Kenilworth, NJ 07033
privacyoffice@spcorp.com

Changes to this Privacy Statement

This privacy statement may be amended consistent with the requirements of Safe Harbor. When we do update the privacy statement, we will also revise the "Last Updated" date at the bottom of this document. Any material changes to this privacy statement will also be posted on www.schering-plough.com/safeharbor.

Last Updated: April 28, 2006