

NOVEMBER 2010

# McKesson Safe Harbor Policy, Notice, and Procedures

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# McKesson Safe Harbor Privacy Policy

McKesson recognizes that privacy is very important to our customers and employees, and therefore strives to protect the personal information it collects and handles. This Safe Harbor Privacy Policy (the "Policy") sets forth the privacy principles that McKesson follows with respect to transfers of personal information from the European Union (EU) to the United States (US).

Scope

This Safe Harbor Privacy Policy (the "Policy") applies to all personal information received by McKesson in the US from the EU. For the most part, that personal information pertains to McKesson employees. Nonetheless, McKesson US operations also provide third tier technical support for our European operations, and may have access to personal information. However, McKesson US operations personnel do not have direct contact with those individuals about whom the information pertains.

## Definitions

The following definitions shall apply throughout this Policy:

"Agent" means any third party that uses personal information provided to McKesson to perform tasks on behalf of and under the instructions of McKesson.

"McKesson" means McKesson Corporation, its subsidiaries, divisions, and business units in the US.

"Personal information" means any information or set of information that identifies an individual, or could be used by or on behalf of McKesson to identify an individual.

"Sensitive personal information" means personal information that pertains to race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns health or sex life. In addition, McKesson will treat as sensitive any information received from a third party where that third party treats and identifies the information as sensitive.

## Privacy Principles

The privacy principles in this Policy are based on the Safe Harbor Privacy Principles.

Notice

When McKesson collects personal information directly from individuals in the EU, it will inform them about the purposes for which it collects and uses their personal information, the types of non-agent third parties, if any, to which McKesson discloses that information, and the choices and means that McKesson offers individuals for limiting the use and disclosure of their personal information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to McKesson, or as soon as practicable thereafter, but in any event before McKesson uses the

information for a purpose other than that for which it was originally collected or processed or discloses it for the first time to a third party.

If McKesson receives personal information from its subsidiaries, affiliates or other entities in the EU, it will use such information in accordance with the notices such entities provided and the consents or choices made by the individuals about whom such personal information relates.

Any inquiries or complaints regarding the use or disclosure of personal information should be reported to McKesson's Office of Global Compliance and Ethics: [compliance@mckesson.com](mailto:compliance@mckesson.com).

Choice McKesson will offer individuals the opportunity to choose (opt-out) whether their personal information is (a) to be disclosed to a non-agent third party (unless allowed or required by contract), or (b) to be used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the individual.

For sensitive personal information, McKesson will give individuals the opportunity to affirmatively and explicitly consent (e.g., through an opt-in) (a) to the disclosure of the information to a non-agent third party, or (b) to the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

McKesson will provide individuals with reasonable methods to exercise their choices.

Data Integrity McKesson will use personal information only in ways that are compatible and relevant for the purposes for which it was collected or subsequently authorized by the individual. McKesson will take reasonable steps to ensure that personal information is reliable for its intended use, accurate, complete, and current.

Onward Transfer McKesson will obtain assurances from its agents that they will safeguard personal information consistently with this Policy. If McKesson has knowledge that an agent is using or disclosing personal information in a manner contrary to this Policy, McKesson will take reasonable steps to prevent or stop the use or disclosure.

Access Upon request, McKesson will grant individuals reasonable access to the personal information that it holds about them, and McKesson will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate.

Security McKesson will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Enforcement McKesson will conduct compliance reviews of its relevant privacy practices to verify adherence to this Policy. Any employee that McKesson determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment.

Dispute Resolution Any questions or concerns regarding the use or disclosure of personal information should be directed to the McKesson Office of Global Compliance and Ethics at the address given below. McKesson will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy. For complaints that cannot be resolved between McKesson and

the complainant, McKesson has agreed to participate in the dispute resolution procedures of the panel established by the European Data Protection Authorities (DPAs) to resolve disputes pursuant to the Safe Harbor Principles.

Contact Information

Questions or comments regarding this policy should be submitted to:

Office of Global Compliance and Ethics  
McKesson Corporation  
One Post Street  
San Francisco, CA 94104  
compliance@mckesson.com

Changes to this Policy

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. McKesson will provide appropriate notice about such amendments.

Effective Date

June 1, 2006

Revised

November 23, 2010

# Employee Safe Harbor Privacy Notice

This notice follows and is based on the principles set in the McKesson Safe Harbor Privacy Policy. The McKesson Safe Harbor Privacy Policy can be found at <http://mcknet.mckesson.com/portal/site/McKNet/menuitem.2fbc3f3df05bafaa297d0c51849270a0/?vgnextoid=430f954f3cb80110VgnVCM1000004929070aRCRD>

or can be requested directly by contacting one of the representatives listed below in the Contact Us section of this notice.

## Scope

This notice sets forth the data privacy policy of McKesson (“we,” “us,” or “our”) concerning the transfer of personal information relating to its employees (“you” or “your,” or “individuals”) from the European Union to McKesson operations and corporate headquarter in the United States (US). In this statement, “personal information” means information that pertains to a present or former employee of McKesson and can be linked to that individual.

We collect and use personal information about you only for job-related purposes. By “job-related purposes,” we mean legitimate purposes reasonably related to your employment by McKesson, your performance of your job responsibilities for McKesson, or our ability to make services and benefits available to you as an employee.

## Notice

We only transfer to McKesson US personal information about you for the purposes of payroll management, headcount, incentive and merit decisions, promotion, and your participation in benefits programs such as the Stock Option Program and the Employee Stock Purchase Program (ESPP).

The information that we transfer to the US includes your contact information such as name, address, McKesson identification numbers, existing compensation, performance ratings, proposed incentive and merit increase, and your eligibility for participation in McKesson benefits programs. This information is gathered for the purpose of human resource administration, and it is not further disseminated or used for any other purpose (e.g., marketing).

Limited sensitive personal information pertaining to race and ethnicity is collected in the UK in accordance with UK legal requirements, and transferred to the US. We therefore do not transfer to the US personal information that reveals political opinions, religious or philosophical beliefs, or trade union membership, or that concerns health or sex life.

You are allowed access to the personal information we transfer to the US and can correct, amend, or delete information where it is inaccurate and as reasonably possible. We provide a list of local contacts below who can assist you in accessing your personal information.

Some European employees are eligible to participate in the Stock Option and Stock Purchase programs. If you are eligible to participate in either or both programs, you should be aware that to facilitate your participation in these programs, McKesson must share a subset of the information we transfer to the US with the third parties that assist us in administering these programs. Those third parties, Merrill Lynch and/or Fidelity,

receive basic payroll data such as name, address, base salary and your level of tax withholding.

Our agreements with Merrill Lynch and/or Fidelity require them to treat your personal information in line with our Safe Harbor Privacy Policy with regard to the protection and handling of your personal information. In addition, we use a variety of security mechanisms when communicating with these third parties to protect your personal information. However, if for any reason you are uncomfortable with the sharing of your personal information with these third parties you can prevent it by not enrolling in the Stock Option or Stock Purchase programs, or cancel your participation in those programs by contacting your local Human Resources (HR) Director. To access your personal information and request to correct, amend, or delete inaccurate information, contact your local HR Director or the Office of Global Compliance and Ethics.

## Contact Us

To limit your information from transfer to Merrill Lynch and/or Fidelity, and for any inquiries, complaints or concerns regarding the protection and privacy of your personal information

Office of Global Compliance and Ethics  
McKesson Corporation  
One Post Street  
San Francisco, CA 94104  
compliance@mckesson.com

EU Human Resources Directors:

To access your personal information and request to correct, amend, or delete inaccurate information

Angela Piper (Ireland)  
Phone 00 353 21 454 8202  
Angela.Piper@mckesson.ie

Patricia Bachoffer (France)  
Phone 33 05 57 89 65 18  
Patricia.Bachoffer@mckesson.fr

Valerie Farrell (UK)  
Phone 01 926 475712  
Valerie.Farrell@mckesson.co.uk

Roswitha Schoonderwoerd (Netherlands)  
Phone 31 306015609  
Roswitha.schoonderwoerd@mckesson.nl