



Original Date: June 13, 2008

Revised Date:

Review Date:

Effective Date: June 13, 2008

This policy replaces all other existing policies/procedures/processes on the effective date

SAFE HARBOR PRIVACY POLICY

Safe Harbor Standards

This Privacy Policy (Policy) contains the privacy principles that Energizer Holdings, Inc., and its U.S. subsidiaries and affiliates engaged in the operations of (i) its Energizer Household Products division (which manufactures and distributes “Energizer” and “Eveready” primary and rechargeable batteries and lighting products) and (ii) its Energizer Personal Care division (which manufactures and distributes “Schick” and “Wilkinson Sword” men’s and women’s shaving products, “Playtex” feminine hygiene and infant care products, and “Banana Boat” and “Hawaiian Tropic” sun care products), (all collectively referred to as "Energizer" in this Policy), follow for "personal information" received from individuals in the European Union (“EU”), by Energizer's companies in the U.S..

"Personal information" is any information that can directly or indirectly lead to the identification of a living person.

The Safe Harbor program is a privacy program that is jointly sponsored by the U.S. Department of Commerce and the European Commission (European government). This program is available for U.S. companies who agree to uphold higher privacy standards than those currently required for companies in the United States.

Energizer commits to uphold the privacy standards for personal information pertaining to individuals in the European Union, according to the Safe Harbor privacy principles in that program.

Scope

Energizer has certified to the Safe Harbor for its Human Resources and Compliance Departments. It has certified for all forms of data from those two departments (e.g., electronically stored, paper files, disks, etc.)

Safe Harbor Privacy Principles

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

Notice: Energizer informs individuals in the EU about the purposes for which it collects and uses information about them, how to contact Energizer with any inquiries or complaints, the

types of third parties to which it discloses the information, and the choices and means Energizer offers individuals for limiting its use and disclosure.

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

Choice: Energizer will process Personal Information about EU individuals only for the purposes for which the information was originally obtained or later authorized by the EU individual unless the individual chooses to affirmatively and explicitly consent ("opt-in") to processing, or unless an exception applies. Energizer provides EU individuals with the opportunity to withdraw consent at any time ("opt-out"), in which case their Personal Information will not be further processed. The right to opt-out is limited in accordance with that permitted or required by law.

Transfer to Third Parties/Sharing: Energizer will only transfer Personal Information about EU individuals to a third party if that third party (a) has provided satisfactory assurances to Energizer that it will protect the information consistent with this Policy; or (b) is located in the EU or a country considered "adequate" for privacy by the EU Commission, and therefore is required to comply with the EU data protection laws or substantially equivalent privacy laws; or (c) the third party has also certified to the Safe Harbor, and is independently responsible for complying with the Safe Harbor requirements.

Where Energizer has knowledge that a third party to whom it has provided EU Personal Information is processing that information in a way contrary to this Policy or the Safe Harbor requirements, Energizer will take reasonable steps to prevent or stop the processing of that data.

Security: Energizer takes reasonable steps to protect EU Personal Information in its possession from loss, misuse, unauthorized access, disclosure, alteration and destruction.

Data Integrity: Energizer takes reasonable steps to ensure that Personal Information about EU individuals is accurate, complete, current and otherwise reliable and relevant in relation to the purpose for which the information was obtained. Energizer does not process EU Personal Information that is incompatible with the notice and consent provided to the individual when such consent is required.

EU individuals have a responsibility to assist Energizer in maintaining accurate, complete and current Personal Information about them.

Access and Correction: Upon written request, Energizer will provide EU individuals with reasonable access to their Personal Information. Energizer will not provide access unless Energizer is supplied with sufficient information to allow it to confirm the identity of the person making the request.

Energizer will also take reasonable steps to allow the EU individuals to review their information for the purposes of correcting their information. There are certain limitations to Access and Correction rights, as set forth in the U.S. Department of Commerce's Safe Harbor materials. That information can be reviewed on the U.S. Department of Commerce's website at www.export.gov.

Enforcement: Energizer has established internal mechanisms to verify its ongoing adherence to this Policy. Individuals who have concerns about this Policy or about the manner in which Energizer is processing their Personal Information are encouraged to contact the Energizer Legal Department at the Energizer Headquarters address set forth below. Energizer will seek to resolve any concerns. Energizer has agreed to participate in the dispute resolution program provided by European Data Protection Authorities.

Limitation on Scope of Principles: Adherence to these Privacy Principles may be limited to the extent required by any legal, governmental, national security or public interest obligation.

Contact Information:

For additional information, please contact:

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