



This Is How Willis Towers Watson Handles the New General Data Protection Regulation (GDPR)

The new General Data Protection Regulation enters into force on 25 May 2018. Willis Towers Watson is therefore obligated to enter into a data processor agreement, which regulates how we handle the personal data, which we process according to your instructions and in your interest.

Is Willis Towers Watson Data Controller or Data Processor?

Willis Towers Watson takes on various roles with regard to data processing, dependent on, whether we advise you as a company, or advise your employees.

1. Company Consultancy

When we submit a bid for a pension agreement and implement the scheme, we receive your personal data, which we pass on to the relevant insurance and pension companies. In this process, we act as your **data processor**, and according to your instructions.

When we receive personal data from you, we act upon the supposition that you have the adequate legal basis for passing on the personal data to us.

2. Employee Consultancy

When we advise your employees, we act as your **data controller**, since we, as part of the consultancy, collect personal data directly from the employee, which is used to deliver our own service: employee consultancy. In this connection, we will ask the employee to give us his/her consent to process the employee's personal data, including the consent to pass on the data to the pension and insurance company, where this is relevant.

When in contact with your employees, we will in the future ask them to sign a declaration of consent. If we are to assist an employee in a concrete case concerning, or dispute against the pension company, and in that connection need to receive specific personal data from the employee (e.g. health data), the employee will be given information on extended consent, which states, how we may use the data in our work of counselling and assisting the employee.



3. The Role of the Pension and Insurance Companies

The pension and insurance companies are not data processors on behalf of you as a customer. The pension and insurance companies process the received data in order to deliver you an independent service and will therefore be deemed **data controllers** with regard to the personal data, which they receive.

You and the insurance company are two independent parties, which have entered into an agreement on insurance. Therefore, in order to establish and fulfil the agreement, you send personal data to the insurance company. The data is used for a new and 'own' purpose: The conclusion of an insurance agreement pursuant to the terms laid out by the insurance company.

It is therefore not necessary to establish a data processor agreement between you and the individual pension and insurance company.

Establishment of Data Processor Agreement

Willis Towers Watson acts as data processor vis-a-vis you, and hence we must enter into a data processor agreement with you. Said agreement is attached for your signature.

If you have any questions regarding the data processor agreement, please feel free to contact our legal department:

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or

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Please note that you are under obligation to ensure that you have the required legal basis to pass on the personal data to us. We will not check whether this legal basis is in place or not.

The Data Subject's Rights and Request for Access

The new rules in the General Data Protection Regulation afford the data subject a number of particular rights.

We will hand your employees an information circular, which will indicate how we handle their personal data, and which rights employees have in that connection, including information on how they are to submit their request for access, rectification, and deletion. A copy of this information circular has been attached for your information.



Secure Communication

When we exchange personal data with you and your employees, it is important that communication takes place in a secure manner and pursuant to recognised industry standards.

At the time being, we have two distinct possibilities to exchange information with you through safe channels: e-Boks and encrypted e-mail:

1. Submission Through e-Boks (Ready mid-May 2018)

Both companies and private individuals can use e-Boks as a secure means of communication. However, this requires that you as a company have signed up for the e-Boks solution and concur to receiving mail from Willis Towers Watson.

2. Usage of Encrypted E-mail

a) TLS Encryption

Transport Layer Security (TLS) is a protocol, which delivers security and data integrity between two communication applications. TLS is the most widely-used security protocol today. Willis Towers Watson uses TLS 1.2.

As default, Willis Towers Watson sends all e-mails via TLS, and if the recipient supports this, e-mails are sent securely via TLS. If the recipient does not support TLS, e-mails will be sent through regular e-mail without TLS.

The same is applicable when an e-mail is sent from you to Willis Towers Watson with TLS. We will receive it securely, since Willis Towers Watson as default supports TLS.

In order to ensure that TLS is used at all times, it is possible to set up a permanent TLS tunnel between Willis Towers Watson and you. A permanent solution requires technical information and set-up at both your and our end. If you would like to opt for this solution, our IT Support can be of assistance.

b) Certificate Encryption

Willis Towers Watson also offers certificate encryption between two mailboxes. Certificate encryption requires that the company is registered with NemID, and that the company has assigned company certificates to its employees. The certificate will be exchanged between the sender and receiving companies/employees and requires set-up in Outlook.

Certificate encryption ensures that the e-mail in question is sent encrypted.

Certificates can be found and downloaded here:

https://www.medarbejdersignatur.dk/produkter/nemid_medarbejdersignatur/information_om_nemid/sikker_e-mail/soeg_certifikat/



Data Protection Policy

You can read more about our data protection policy on our website, www.willis.dk, and you are always welcome to ask questions about how we handle personal data.

With Kind Regards,

Anne Patricia Rehlsdorph
Assistant General Counsel, Partner