

Information on How Willis Towers Watson Collects and Processes Personal Data





Information on how Willis Towers Watson Collects and Processes Personal Data

This notice informs you which data Willis Towers Watson collects about you, and what the data is used for. You are furthermore informed of the legal basis for the processing of your personal data, and about your rights.

This document contains information on:

1. Willis Towers Watson in its role as data controller vis-a-vis you
2. Which data Willis Towers Watson collects, in addition to purpose and legal basis
3. Whom Willis Towers Watson passes the information on to
4. Security
5. For how long does Willis Towers Watson retain your data
6. Your rights pursuant to the Data Protection Regulation

The Processing of personal data is regulated by the EU Personal Data Regulation ("Personal Data Regulation") and the General Data Protection Regulation ("General Data Protection Regulation") (collectively "Data Protection Regulation") (See specific references to the Data Protection Regulation in item 8).

1. Willis Towers Watson in its Role as Data Controller Vis-a-Vis You

Willis Towers Watson will personally counsel and advise you; this includes consulting on and establishing and maintaining personal insurance and/or pension agreements, and consulting in case of claims and pension-related events. This could be in connection with insurances and pensions, which have been set up through your employer, and in connection with insurances and pensions set up by you personally.

Willis Towers Watson is data controller in connection with the processing of your personal data. Item 7 contains comprehensive information on how to contact Willis Towers Watson.

Note that Willis Towers Watson also may process information about you on behalf of your employer, and upon request of your employer. Your employer is data controller for the processing, and you should have received information from your employer to this regard.



2. Which information Willis Towers Watson Collects, in Addition to Purpose and Legal Basis

Willis Towers collects information on you, which is used to counsel and advise you.

Most of the information used is collected from you personally, but Willis Towers Watson may receive information from other sources, including from your employer and your insurance or pension company, as well as – contingent upon your specific consent – from your union or unemployment fund, your employment centre, physician and other health professionals.

The information that Willis Towers Watson requests you to provide may be of a such nature, that the absence of such information may mean, that they cannot offer to counsel and advise you.

Willis Towers Watson solely collects and processes your personal data to the extent that an adequate legal basis is inherent in the Data Protection Regulation.

Depending on the consultation services and assistance you receive from Willis Towers Watson, it may be necessary to collect and process:

CPR-Number (Central Population Register No.)

Willis Towers Watson will request you to provide your CPR-number, and in a separate form consent to your CPR-number being processed. The aim of this is to make a unique identification of you vis-a-vis your pension and insurance companies. At the time of drawing up insurance and pension, your CPR-number will be passed on to the pension and insurance companies in question. The legal basis for processing your consent is worded in the General Data Protection Regulation § 11, paragraph 2, no. 2.

Data Concerning Health

As a point of departure, Willis Towers Watson shall not use your health-related data. The insurance and pension companies will often require health-related data and will inform you thereof. Willis Towers Watson can help you to communicate your health-related data to the pension and insurance companies. Exceptionally, Willis Towers Watson may need insight into your health-related data, including any information on loss of earning capacity; this data shall be used when consulting on insurance and pension agreements, including those instances, where a pension or insurance company has declined your insurance or pension application with reference to your personal health data, and in connection with claims for which Willis Towers Watson acts as an advisor to you. In these cases, Willis Towers Watson will always process your health-related data pursuant to your specific consent, which will be obtained in a separate document. The legal basis for processing your consent is to be found in the Personal Data Regulation article 9(2), point a.



Data on Union or Unemployment Fund Affiliation

In case of claims, Willis Towers Watson may need to collect data on your union or unemployment affiliation with the aim of advising you on how you stand with regard to the specific union or unemployment fund, and with regard to the early retirement pay scheme. Willis Towers Watson will always process your data on union or unemployment fund affiliation pursuant to your specific consent, which will be obtained in a separate document. The legal basis for processing your consent is to be found in the Personal Data Regulation article 9(2), point a.

Information From Your Employment Centre

In case of claims, Willis Towers Watson may need to collect information from your employment centre with regard to flex-job or early retirement. In these cases, Willis Towers Watson will always process your data from your employment centre pursuant to your specific consent, which will be obtained in a separate document. The legal basis for processing your consent is to be found in the Personal Data Regulation article 9(2), point a.

Additional Data

In addition to the data mentioned above, Willis Towers Watson will usually need to process, among other, the data categories listed below:

- Contact information, including name, address, phone number, and e-mail.
- Data regarding your terms of employment, including job title, date of employment, and seniority, salary and pension contribution, and collective agreement affiliation, work place, and any secondments, data on severance, leave of absence, etc.
- Data on your insurance and pension agreements, including coverage, deposits, investment choices, beneficiaries, depot overview, etc. This is both with regard to insurances and pensions, which have been set up by your employer, and insurances and pensions set up by yourself.
- Data on other income, assets, and tax conditions, as well as data on your civil status and household.

This data is required so that Willis Towers Watson can communicate with you and administrate and deliver your consultation services. The legal basis for processing is to be found in the Personal Data Regulation article 6(1), point b.

Willis Towers Watson may also need to process data on you, and on agreements entered into between Willis Towers Watson and you, so that we may fulfil our obligations pursuant to the Accountancy Act and the Money Laundering Act. The legal basis for this is to be found in the Personal Data Regulation article 6(1), point c.



Finally, it may be necessary to process your data in order to establish, raise or defend legal claims, including if you or others take legal action against Willis Towers Watson. The legal basis for this is to be found in the Personal Data Regulation article 6(1), point f, and article 9(2), point f.

If you have given your express consent to Willis Towers Watson sending you newsletters, and information regarding other services, your contact details will be processed so that we may communicate with you. To ensure that newsletters and other marketing initiatives are relevant to you, Willis Towers Watson may individualise communication with you based on the other data, which Willis Towers Watson has on you and on your pensions and insurances. The legal basis for this is to be found in the Personal Data Regulation, article 6(1), point a, point b, and point f. You may at any time opt out of receiving additional newsletters and marketing communications. Item 7 contains comprehensive information on how to contact Willis Towers Watson.

If Willis Towers Watson later wishes to process your personal data for other purposes than those for which the personal data was collected, you will prior to the processing be informed of the other purpose, including the legal basis for the processing.

3. Whom Willis Towers Watson Passes Data on To

Willis Towers Watson passes on your personal data to the selected insurance and pension companies when establishing, amending, administering, and discontinuing the insurance and pension relationship, and when assisting in claims and other pension and insurance-related events. In cases of claims, Willis Towers Watson will, contingent upon your consent, pass on your data to your union or unemployment fund, as well as to your employment centre.

Willis Towers Watson is part of a group, and may within a relevant framework, and pursuant to legal basis in the Data Protection Regulation, pass on your data to other companies in the group for group-related and management-related purposes.

Furthermore, your personal data may be transferred to suppliers, collaboration partners, or other third parties, who process data on behalf of Willis Towers Watson. When using such data processors, it is ensured that a contractual agreement is entered into, according to which the data processor solely may process personal data in accordance with Willis Towers Watson's instructions, which requires that the data processor establishes sufficient organisational and safety regulations.

Willis Towers Watson only transfers personal data to data processors outside the EU and EEA, if it has been suitably warranted that the protection level is sufficient; this includes EU Commission model agreements and data transfer.



4. Security

Willis Towers Watson has established suitable technical and organisational measures to ensure that your personal data is not accidentally or illegally destroyed, lost, changed, or devalued, and to ensure that it does not fall into the hands of unauthorised persons, are infringed upon, or in other manner processed in breach of the Data Protection Regulation.

5. For How Long Does Willis Towers Watson Retain Your Data

Personal data is deleted, when storage no longer has a factual purpose.

Under normal circumstances, five (5) years after the consultation relationship between you and Willis Towers Watson has ended, there will no longer be a factual purpose of storing personal data, but Willis Towers Watson may decide to prolong the storage, if it so deemed necessary for Willis Towers Watson to establish, raise or defend legal claims against Willis Towers Watson.

6. Your Rights

When Willis Towers Watson processes data about you, you have several rights pursuant to the Data Protection Regulation. This section informs you of your rights, and how to avail of them.

6.1 Right of Access

You have the rights to ask Willis Towers Watson for information on, among other, which categories of personal data Willis Towers Watson has on you, and to which purposes they are processed, the recipients or categories of recipients, to whom the data has been or will be passed on to, information on the provenance of the data, etc. You have the right to receive a copy of the personal data, which Willis Towers Watson processes on you. You can read more about your right of access in the Personal Data Regulation, article 15.

6.2 Right of Rectification

You have the right to have incorrect personal data about you rectified. If you notice that the data, which Willis Towers Watson has registered on you, is erroneous, we request you to contact Willis Towers Watson in writing to have the data corrected. You can read more about your right of rectification in the Personal Data Regulation, article 16.

6.3 Right of Deletion

In some cases, you have the right to have all or part of your personal data deleted by Willis Towers Watson, e.g. if you revoke your consent, and no other legal basis exists to continue the processing. To the extent that



your data needs to be processed further, e.g. for Willis Towers Watson to fulfil its legal obligations, or to establish, raise or defend legal claims, Willis Towers Watson is not obliged to delete your personal data. You can read more about your right of deletion in the Personal Data Regulation, article 17.

6.4 Right to Limit Processing to Storage

In certain cases, you have the right to limit the processing of your personal data to consist solely of storage, e.g. if you believe the data, which Willis Towers Watson is processing about you, is erroneous. You can read more about your right of limitation in the Personal Data Regulation, article 18.

6.5 Right of Data Portability

In certain cases, you have the right to have handed over personal data, which you have given Willis Towers Watson, in a structured, commonly used, and machine-readable format, and you have the right to, if technically possible, have this data transferred to another data controller. You can read more about your right of data portability in the Personal Data Regulation, article 20.

6.6 Right of Objection

You have at all times right to object to how Willis Towers Watson processes your personal data, which Willis Towers Watson collects and processes. If you object to the processing, and given that the objection is justified, Willis Towers Watson is no longer allowed to process your personal data, unless they can demonstrate legal grounds for continued processing. You have an unconditional right to object to the processing of your data for the use for direct marketing. You can read more about your right of objection in the Personal Data Regulation, article 21.

6.7 Right to Revoke Consent

You have at all times right to revoke your consent. If you revoke your consent, you should be aware, that Willis Towers Watson under certain conditions no longer will be able to provide you with the required consultation services. In such cases, you shall be informed thereof.

In some cases, Willis Towers Watson will be able to continue processing your personal data, regardless of whether you revoke your consent or not. This will be the case, if there is a basis for processing your data other than your consent.

If you wish to revoke your consent, you may contact Willis Towers Watson by using Willis Towers Watson's formula for the revocation of consent. The form can be found on Willis Towers Watson's website, www.willis.dk, under the point "Personal Data".



6.8 Right of Complaints

You have at all times the right to submit a complaint to Datatilsynet (The Danish Data Protection Agency), Borgergade 28, 5., 1300 Copenhagen K, with regard to the processing of your personal data. A complaint may also be submitted at dt@datatilsynet.dk or on phone number +45 33 19 32 00.

6.9 How to Avail of Your Rights

If you wish to avail of one or more of your rights, you must contact Willis Towers Watson via a form, which you can find on Willis Towers Watson's website, www.willis.dk, under "Personal Data". You will be asked to use NemID when contacting us in order to determine your identity.

7. How to Contact Willis Towers Watson

If you have any questions regarding how Willis Towers Watson processes your personal data, or if you wish to avail of one or more of your rights, as described in item 6, you may contact Willis Towers Watson at:

Willis Towers Watson

CVR-Number (Central Business Register Number) 1318 0695

Rundforbivej 303, 2850 Nærum

dk-info@willistowerswatson.com

+45 88 13 96 00

8. Data Protection Regulation

The processing of personal data is regulated by:

- THE EUROPEAN PARLIAMENT AND COUNCIL REGULATION (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("the Personal Data Regulation").
- Law* on supplemental provisions for the regulation on the protection of natural personal in connection with the processing of personal data and on the free movement of such data ("The Data Protection Regulation"), as well as
- Any other legislation, which implements or complements these rules

The Data Protection Regulation is expected to be adopted in May 2018.

About Willis Towers Watson

Willis Towers Watson (NASDAQ: WLTW) is a leading global advisory, broking and solutions company that helps clients around the world turn risk into a path for growth. With roots dating to 1828, Willis Towers Watson has 40,000 employees serving more than 140 countries. We design and deliver solutions that manage risk, optimize benefits, cultivate talent, and expand the power of capital to protect and strengthen institutions and individuals. Our unique perspective allows us to see the critical intersections between talent, assets and ideas – the dynamic formula that drives business performance. Together, we unlock potential. Learn more at willistowerswatson.com.