

# 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. Furthermore, you are informed of the legal basis for the processing of your personal data and of 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 General Data Protection Regulation
7. Where Willis Towers Watson processes your data

The Processing of personal data is regulated by the EU General Data Protection Regulation (“the General Data Protection Regulation”) and the Act on supplementary provisions to the regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“the Data Protection Act”) (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 (hereinafter “we” or “us”) 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 that have been set up through your employer and in connection with insurances and pensions set up by you personally.

We are data controller in connection with the processing of your personal data. Item 7 contains comprehensive information on how to contact us.

Note that Willis Towers Watson may also process information about you on behalf of your employer and upon request from your employer. Your employer is data controller for that 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

To counsel and advise you, we collect information on you.

Most of the information used is collected from you personally but we 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 center, physician and other health professionals.

The information we request you to provide may be of such nature that the absence of such information may mean that we cannot offer to counsel and advise you.

We solely collect and process 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 us, it may be necessary to collect and process:

### CPR-number (Central Population Register No.)

We will request you to provide your CPR-number and in separate from consent to your CPR-number being processed. The aim of this is to make a unique identification of you vis-à-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 Data Protection Act section 11, subsection 2, number 2.

### Data Concerning Health

As a point of departure, we will not use your health-related data. The insurance and pension companies will often require health-related data and will inform you thereof. We can help you to communicate your health-related data to the pension and insurance companies. Exceptionally, we 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, we 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 General Data Protection Regulation article 9(2), point a.



### Data on Union or Unemployment Fund Affiliation

In case of claims we may need to collect data on your union or unemployment affiliation with the aim of advising you on how you stand regarding the specific union or unemployment fund and regarding the early retirement pay scheme. We 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 General Data Protection Regulation article 9(2), point a.

### Information from Your Employment Centre

In case of claims we may need to collect information from your employment center regarding measures for placing disabled persons in employment or early retirement. In these cases, we will always process your data from your employment center 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 General Data Protection Regulation article 9(2), point a.

### Additional Data

In addition to the data mentioned above, we 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, collective agreement affiliation, work place and any secondments and data on severance, leave of absence etc.
- Data on your insurance and pension agreements, including coverages, deposits, investment choices, beneficiaries, depot overview etc. This is both regarding insurances and pensions that 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 we can communicate with you and administer and deliver your consultation services. The legal basis for processing is to be found in the General Data Protection Regulation article 6(1), point b.

We may also need to process data on you and on agreements entered into between Willis Towers Watson and you so that we may fulfill our obligations pursuant to the Accountancy Act and the Money Laundering Act. The legal basis for this is to be found in the General Data Protection 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 General Data Protection 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, we may individualise communication with you based on the other data we have on you and on your pensions and insurances. The legal basis for this is to be found in the General Data Protection Regulation article 6(1), point a, b and 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 we later wish 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**

We pass 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 we will, contingent upon your consent, pass on your data to your union or unemployment fund as well as to your employment center.

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 our 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 contractual clauses.

### **4. Security**

We have 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 there will no longer be a factual purpose of storing personal data 10 years after the consultation relationship between you and Willis Towers Watson has ended, but we may decide to prolong the storage if it is so deemed necessary for us to establish, raise or defend legal claims against Willis Towers Watson.

## 6. Your rights

When we process 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 us for information on, among other, which categories of personal data we have 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 we process on you. You can read more about your right of access in the General Data Protection 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 we have registered on you, is erroneous, we request you to contact us in writing to have the data corrected. You can read more about your right of rectification in the General Data Protection 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 us, 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 us to fulfil our legal obligations or to establish, raise or defend legal claims, we are not obliged to delete your personal data. You can read more about your right of deletion in the General Data Protection 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 we process about you is erroneous. You can read more about your right to limit processing to storage in the General Data Protection 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 us, 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 General Data Protection Regulation article 20.

### 6.6 Right of Objection

At all times, you have the right to object to how we process your personal data, which we collect and process. If you object to the processing, and given that the objection is justified, we are no longer allowed to process your personal data, unless we 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 General Data Protection Regulation article 21.

### 6.7 Right to Revoke Consent

At all times, you have the right to revoke your consent. If you revoke your consent you should be aware that we, 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, we 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 must contact our Data Protection Officer, Anne Patricia Rehlsdorph via e-mail: [AnnePatricia.Rehlsdorp@WillisTowersWatson.com](mailto:AnnePatricia.Rehlsdorp@WillisTowersWatson.com).

### 6.8 Right of Complaints

At all times, you have the right to submit a complaint to the Danish Data Protection Agency (Borgergade 28, 5., 1300 Copenhagen K) regarding the processing of your personal data. A complaint may also be submitted at [dt@datatilsynet.dk](mailto: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 our Data Protection Officer, Anne Patricia Rehlsdorph via e-mail: [AnnePatricia.Rehlsdorp@WillisTowersWatson.com](mailto:AnnePatricia.Rehlsdorp@WillisTowersWatson.com).



## 7. Where Willis Towers Watson processes your data

### Location 1 (primary location):

Tangen 17, 1. 4.  
DK-8200 Aarhus N  
Denmark

### Location 2:

Rundforbivej 303  
DK-2850 Nærum  
Denmark

### Location 3:

Østre Havnepromenade 24, 2.  
DK-9000 Aalborg  
Denmark

### Location 4:

Nupark 49F  
DK-7500 Holstebro  
Denmark

### Location 5:

Nyvang 16  
DK-5500 Middelfart



Denmark

Backups are stored at the Group IT center:

Willis Towers Watson

Friars Street

IP1 1TA

Ipswich

United Kingdom

From 1 November 2019, backups will be stored at the following locations:

Noris Network AG, DataCentre.DE, 200M Div. PIP D-85609 Aschheim, Klausnerstr. 30

Munich

Germany

and

Noris Network AG, Datacentre.DE 200M Div. PIP Thomas-Mann-Straße 16 – 20

90471 Nürnberg

Germany

## **8. How to Contact Willis Towers Watson**

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

Willis Towers Watson I/S

Company registration number: 13180695



Address: Rundforbivej 303, DK-2850 Nærum

E-mail (Data Protection Officer, Anne Patricia Rehlsdorph): [AnnePatricia.Rehlsdorph@WillisTowersWatson.com](mailto:AnnePatricia.Rehlsdorph@WillisTowersWatson.com)

Telephone: +45 88 13 96 00

## 9. 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 65/46/EC (General Data Protection Regulation) (“the General Data Protection Regulation”)
- Act on supplementary provisions to the regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“the Data Protection Act”), as well as
- Any other legislation, which implements or complements these rules

## 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](https://willistowerswatson.com).