

# Willis Towers Watson Australia & New Zealand Privacy Policy for Clients, Insureds, and Claimants

Please read this Privacy Policy carefully. It describes how Willis Towers Watson handles personal information about You which Willis Towers Watson collects in connection with the services Willis Towers Watson provides. It also explains certain legal rights You have in connection with Your personal information which is handled by Willis Towers Watson. This Privacy Policy may be revised from time to time to reflect changes in law or changes in Willis Towers Watson's business operation. This Privacy Policy was last updated on 21 May 2019.

## 1. What is the purpose of this Privacy Policy, and does it apply to me?

This Privacy Policy explains how Willis Towers Watson handles personal information about You. Generally speaking, this Privacy Policy will apply to You if You directly or indirectly benefit from the services Willis Towers Watson provides (typically insurance-related) in Australia or New Zealand.

1.1 In many countries around the world (including Australia and New Zealand), there are laws that require organisations that handle personal information to comply with certain legal requirements, including the requirement to be open and transparent about the way in which personal information is handled.

1.2 The purpose of this Privacy Policy is to inform You how Willis Towers Watson handles personal information about You which Willis Towers Watson obtains in connection with its business activities. This Privacy Policy will apply to You if Willis Towers Watson in Australia or New Zealand obtains Your personal information in connection with Willis Towers Watson's business activities.

1.3 Please note that this Privacy Policy does not apply to You if You are:

1.3.1 an employee, contractor, or any other type of worker engaged by Willis Towers Watson.

1.3.2 a visitor to any website which is maintained by Willis Towers Watson (including Willis Towers Watson's main website at <https://www.willistowerswatson.com> and the online tools accessible from there), in which case the collection of any personal information about You will be subject to the separate website privacy notice for the relevant website. Unless specifically stated otherwise, the website privacy notice applicable to all website maintained by Willis Towers Watson can be found at:

<https://www.willistowerswatson.com/en-au/privacy-and-cookies>

1.4 Nothing in this Privacy Policy alters any existing relationship between You and Willis Towers Watson, or creates any new relationship between You and Willis Towers Watson. Nothing in this Privacy Policy affects any right You have under any applicable law which regulates the way in which Willis Towers Watson handles Your personal information.

## 2. Who at Willis Towers Watson is responsible for the handling of my Personal Information?

Generally speaking, one of Willis Towers Watson companies located in Australia or New Zealand will be responsible for ensuring that Your personal information is handled properly by Willis Towers Watson. The particular company responsible will vary depending a number of factors, such as Your location and Your relationship with Willis Towers Watson.

2.1 Willis Towers Watson is a leading global risk advisor and insurance/reinsurance broker that operates around the world. The ultimate parent and holding company of Willis Towers Watson is Willis Towers Watson PLC, a company incorporated in the Republic of Ireland, whose registered address is at Grand Mill Quay, Barrow Street, Dublin 4, Republic of Ireland.

2.2 The particular company within Willis Towers Watson who is responsible for the handling of Your personal information in connection with the services provided by Willis Towers Watson will vary depending on the nature of the services provided and the location in which the services are provided.

2.3 In Australia, the responsible companies are:

2.3.1 Willis Australia Limited, Level 16, Angel Place, 123 Pitt Street, Sydney NSW 2000, and CKA Risk Solutions Pty Limited, Level 4/88 William Street, Perth WA 6000, Australia (in respect of personal information handled in relation to insurance broking and related services provided in Australia);

2.3.2 Willis Reinsurance Australia Limited, Level 16, Angel Place, 123 Pitt Street, Sydney NSW 2000, Australia (in respect of personal information handled in relation to reinsurance broking and related services provided in Australia); or

2.3.3 Willis Employee Benefits Pty Limited, Level 16, Angel Place, 123 Pitt Street, Sydney NSW 2000, Australia (in respect of personal information handled in relation to pension, medical, and other like employee benefits and related services provided in Australia).

2.4 In New Zealand, the responsible company is Willis New Zealand Limited, Level 8, 21 Queen street, Auckland 1140, New Zealand (in respect of personal information handled in relation to all services provided in New Zealand).

### 3. What Personal Information about me does Willis Towers Watson collect?

Personal information collected by Willis Towers Watson will vary depending on many factors, but may include a broad range of personal information, including personal information of a sensitive nature such as details of Your bank account, finances, and information concerning Your health.

3.1 The type and amount of personal information about You which Willis Towers Watson collects will vary depending on various factors, including Your personal circumstances, the nature of Your relationship with Willis Towers Watson (or Willis Towers Watson's client), and the relevant services provided by Willis Towers Watson, but may include any combination of the following:

3.1.1 Your contact details such as name, postal address, email address, and telephone number;

3.1.2 Your gender, date/place of birth, marital status, dependents, nationality, country of residence, occupation, hobbies, habits, and other similar demographic information;

3.1.3 Your unique identifiers such as bank account number, credit card number, tax file number, passport

number, and driver's licence number;

3.1.4 Information about Your finances, such as details of Your income, assets, investments, debts, creditworthiness, tax status, and existing pension/ insurance arrangements;

3.1.5 Information about Your physical and mental health, including Your medical history, description of illness or injury suffered, and any specific treatment received;

3.1.6 Information about You which Willis Towers Watson is obliged to check for legal or regulatory reasons, such as information relating to Your identity, any directorship of companies You hold, and Your criminal history (including allegations of crimes);

3.1.7 Other information about You which Willis Towers Watson handles in connection with the services Willis Towers Watson provides to You or a client of Willis Towers Watson, such as Your personal circumstances that need to be described in arranging any (re)insurance for You or a client of Willis Towers Watson, details of incidents giving rise to any (re)insurance claim in which You are involved, and facts and circumstances involving You in respect of which Willis Towers Watson is asked to advise a client; and

3.1.8 Other information about You which Willis Towers Watson collects as part of its day-to-day business operation, such as information about Your visit to Willis Towers Watson's office, Your attendance at meetings and events hosted by Willis Towers Watson, and Your correspondence with Willis Towers Watson's brokers and advisors.

3.2 Please note that personal information which Willis Towers Watson collects may include sensitive information such as Your racial/ethnic origin, religious/philosophical/political views or affiliations, membership of trade union or professional/trade association, sex life, criminal record, and health.

3.3 Willis Towers Watson will collect Your personal information only if and to the extent it is necessary for one or more of the purposes described in Section 4 below.

### 4. Why does Willis Towers Watson collect my Personal Information?

Willis Towers Watson collects personal information mainly to provide its services (e.g. to arrange insurance, to handle insurance claims, or to provide risk management advice), but Willis Towers Watson also collects personal information for a variety of other related business purposes.

4.1 Willis Towers Watson collects and uses Your personal information primarily for the following purposes:

4.1.1 to provide services which You personally request (e.g. where You request Willis Towers Watson to arrange

personal insurance for Your domestic purpose or commercial insurance for Your own business purpose);

4.1.2 to provide services which You did not personally request but is nevertheless arranged for Your benefit (e.g. where Your employer asks Willis Towers Watson to arrange health plan, pension plan, or other forms of employee benefits, or where a client of Willis Towers Watson asks Willis Towers Watson to arrange any (re) insurance which might directly or indirectly benefit You); and

4.1.3 to provide services which You did not personally request but were requested by Willis Towers Watson's client and requires Willis Towers Watson to interact, directly or indirectly, with You (e.g. where You bring a claim against Willis Towers Watson's client and Willis Towers Watson is required to handle the claim under the relevant (re)insurance policy).

4.2 Willis Towers Watson also collects and uses Your personal information for the following related purposes:

4.2.1 to enable underwriters, actuaries, insurers, reinsurers, other brokers, claims handlers, surveyors, loss adjustors/assessors, accident investigators, specialist risks advisors, pension providers, banks and other lenders (including premium finance providers), health professionals, lawyers, accountants, auditors, consultants, and other like third party professional advisors and service providers to provide their services (to the extent their involvement is inherent in or necessary in connection with the services provided by Willis Towers Watson);

4.2.2 to enable affiliates of Willis Towers Watson and non-affiliated third party services providers (e.g. IT services providers, administrative support service providers, etc.) to provide services that directly or indirectly support Willis Towers Watson's business operation and the services provided by Willis Towers Watson;

4.2.3 to comply with legal or regulatory requirements imposed on Willis Towers Watson or a client of Willis Towers Watson (including the requirement to conduct 'Know-Your-Client' checks, anti-money laundering/sanctions screening, and other like due diligence checks);

4.2.4 to improve or develop the products and services Willis Towers Watson provides to its clients in general (e.g. improving internal business processes, providing analysis on trends in the (re)insurance market or employee benefits market, benchmarking (re)insurance products, devising ways to simplify/streamline the (re)insurance placement process or claims handling process, designing new types of (re)insurance products, etc.); and

4.2.5 to contact You and generally maintain the relationship between You and Willis Towers Watson in connection with the services provided by Willis Towers Watson, and to keep You informed about the products and services offered by Willis Towers Watson and other members of Willis Towers Watson which might be of interest or benefit to You.

4.3 For the purpose of improving or developing Willis Towers Watson's products and services (see Section 4.2.4 above), Willis Towers Watson may use Your personal information to create and analyse statistical data, and the outcome of such analysis might be shared with third parties. However, such analysis will be conducted solely on an aggregated and anonymous basis and under no circumstance will any specific personal information relating to You or any information from which You could be identified be included in such analysis.

4.4 Your personal information will be used for relationship maintenance/marketing purpose (see Section 4.2.5 above) only if You are Yourself a client of Willis Towers Watson or if You are the business contact at Willis Towers Watson's client (i.e. You fall within the category of persons described in Section 5.2.1 or 5.2.2 below). For further information regarding Willis Towers Watson's direct marketing practice, please refer to Section 7 below.

4.5 Please note that Willis Towers Watson will never use Your personal information for any purpose not described above without Your prior consent (or the prior consent of the relevant client of Willis Towers Watson, where applicable).

## 5. How does Willis Towers Watson obtain my Personal Information?

Personal information handled by Willis Towers Watson is typically provided by a client of Willis Towers Watson. However, depending on the circumstances, Willis Towers Watson might collect personal information from other third parties who are relevant to the services Willis Towers Watson provides, and Willis Towers Watson might also collect personal information directly from You.

5.1 Where Willis Towers Watson is required to handle Your personal information, Willis Towers Watson generally obtains Your personal information indirectly from a client of Willis Towers Watson (typically a company, partnership, public authority, or other like body corporate) which receives services that affect You. For example, Willis Towers Watson might indirectly receive Your personal information from a client of Willis Towers Watson where the client asks Willis Towers Watson to:

5.1.1 arrange any (re)insurance that benefits the client's directors, officers, employees, customers, guests, visitors, or other persons that interact with the client;

5.1.2 arrange pensions, medical insurance, and other employee benefits for directors, officers, and employees of the client;

5.1.3 handle claims made against the client under any (re)insurance policy;

5.1.4 advise the client on the management of its business risks and (re)insurance arrangements; or

5.1.5 manage any aspect of the client's business affairs on behalf of the client (e.g. in connection with the set-up and operation of a captive insurance programme);

5.2 Occasionally, it will be necessary for Willis Towers Watson to obtain Your personal information directly from You. For example, this could be the case where:

5.2.1 You are employed or otherwise engaged by a client of Willis Towers Watson and Your job involves any direct interaction with Willis Towers Watson (e.g. if You are a Risk Manager or a Finance Director of a client of Willis Towers Watson, and You are involved in making (re) insurance purchase decisions);

5.2.2 You directly interact with Willis Towers Watson as a client of Willis Towers Watson in respect of Your personal/domestic insurance requirements (e.g. insurance for Your personal motor vehicle or Your family home, etc.), or in respect of Your own business, profession, or trade (e.g. where You act as a sole trader, sole practitioner, or business proprietor and receive Willis Towers Watson's services in connection with Your business needs);

5.2.3 You are an individual to be insured by a client of Willis Towers Watson or a beneficiary of any insurance, pension, or similar benefit a client of Willis Towers Watson arranges for Your benefit and Willis Towers Watson is required to collect Your personal information directly from You in order to make the necessary arrangements for Willis Towers Watson's client;

5.2.4 You bring any insurance claim against a client of Willis Towers Watson and where Willis Towers Watson is involved in the direct handling of such claim (or the corresponding reinsurance claim); or

5.2.5 Willis Towers Watson needs to talk to You or correspond with You in order to provide risk management consultancy or other like advisory services to Willis Towers Watson's clients.

5.3 Depending on the circumstances, Willis Towers Watson may also obtain Your personal information from other sources such as:

5.3.1 publicly accessible registers and databases (such as registers of companies/directors, bankruptcy, and court judgments), credit reference agencies, providers of identity verification services, providers of insurance claims validation services, operators of insurance fraud and other business risk screening databases, and other like providers of due diligence services; and

5.3.2 underwriters, actuaries, insurers, reinsurers, other brokers, claims handlers, surveyors, loss adjustors/assessors, accident investigators, specialist risks advisors, pension providers, banks and other lenders (including premium finance providers), health professionals, lawyers, accountants, auditors, consultants, and other like third party professional advisors and service providers, as well as third parties that have referred You to Willis Towers Watson and other like third parties who interact with Willis Towers Watson in connection with the services Willis Towers Watson provides.

## 6. Do I have to give my Personal Information to Willis Towers Watson or allow Willis Towers Watson to handle my Personal Information?

You do not have to provide personal information requested by Willis Towers Watson, and You do not have to allow Willis Towers Watson to handle Your personal information. However, such refusal can potentially disadvantage You and additionally, Willis Towers Watson might handle Your personal information regardless of Your wishes where the law allows Willis Towers Watson to do so.

6.1 It is not mandatory for You to provide any personal information Willis Towers Watson asks You to provide or for You to consent to Willis Towers Watson handling Your personal information in any particular way. You can also at any time revoke any consent You give in respect of the processing of Your personal information by Willis Towers Watson if You change Your mind.

6.2 However, if You:

6.2.1 refuse to provide Your personal information which Willis Towers Watson requests;

6.2.2 do not consent to Willis Towers Watson handling Your personal information in accordance with this Privacy Policy; or

6.2.3 revoke any consent regarding the handling of Your personal information by Willis Towers Watson which You have previously given.

then such refusal or revocation of previously given consent might prevent Willis Towers Watson from performing its services, and this might in turn, depending on Your circumstances, adversely affect You (e.g. through delays in placement of (re)insurance or assessment/payment of (re) insurance claims).

6.3 Please note that due to the nature of services Willis Towers Watson provides and the relevant legal and regulatory requirements that govern them, Willis Towers Watson is unlikely to be able to deal with You if You refuse to properly identify Yourself or if You insist on using pseudonym in dealing with Willis Towers Watson.



6.4 If You consent to the collection and processing of Your personal information by Willis Towers Watson but later revoke Your consent, Willis Towers Watson will endeavour to comply with Your request but there may be circumstances where Willis Towers Watson will not be able to comply with Your request (e.g. if You revoke Your consent to the disclosure of Your personal information to third parties, Willis Towers Watson will not be able to 'undo' a disclosure that has already taken place).

6.5 Additionally, where there is a relevant legal exemption that applies to the way in which Willis Towers Watson collects and processes Your personal information, Willis Towers Watson reserves the right to rely on such legal exemption to collect and process Your personal information regardless of Your wishes but only if and to the extent it is necessary to do so for one or more of the purposes described in Section 4 above (e.g. where Willis Towers Watson is required by law to validate Your identity for fraud prevention purpose or compelled by law to disclose Your personal information to regulators or law enforcement agencies, or where Willis Towers Watson would otherwise be prevented from providing the services as requested by Willis Towers Watson's client).

## 7. Does Willis Towers Watson use my Personal Information for Marketing?

Willis Towers Watson does not engage in direct marketing that targets consumers in general. However, depending on Your relationship with Willis Towers Watson, You might receive marketing communications from Willis Towers Watson. Where this is the case, Willis Towers Watson will always respect Your marketing preference.

7.1 Willis Towers Watson does not engage in direct marketing activities that target consumers in general, but if You are Yourself a past or current client of Willis Towers Watson (or a prospective client referred to Willis Towers Watson by a third party), or if You are a Willis Towers Watson's business contact at a past, current, or prospective client of Willis Towers Watson, You might from time to time receive marketing communications from Willis Towers Watson, e.g. information regarding a new product or service offered by Willis Towers Watson, or invitation to a seminar or conference hosted by Willis Towers Watson which might be of interest to You (see Section 4.4 above).

7.2 Where Willis Towers Watson sends any such marketing communication to You, Willis Towers Watson will ensure that such marketing communications are sent in compliance with the applicable laws, and in particular, ensure that there is an easy way for You to stop receiving (i.e. "opt-out" from) such marketing communications in the future.

7.3 Willis Towers Watson will also comply with any applicable law that specifically regulates the use of Your personal information for direct marketing purposes, including any applicable rules concerning the use of a 'Do-Not-Call' registry or similar facility.

7.4 Willis Towers Watson will never sell, rent, or otherwise share Your personal information with operators of marketing databases, or any other non-affiliated third party solely for such third party's own marketing purposes without Your prior consent (or the prior consent of the relevant client of Willis Towers Watson, where applicable). For further clarification regarding how Willis Towers Watson shares Your personal information with third parties, please see Section 8 below.

## 8. Does Willis Towers Watson share my Personal Information with third parties?

Willis Towers Watson shares personal information with third parties mainly to provide its services (e.g. to arrange insurance, to handle insurance claims, or to provide risk management advice), but Willis Towers Watson also shares personal information for a variety of other related business purposes.

8.1 Willis Towers Watson will share Your personal information with third parties only if and to the extent it is necessary and appropriate for one or more of the purposes set out in Section 4 above. Specifically, Willis Towers Watson may share Your personal information with the following types of third parties:

8.1.1 underwriters, actuaries, insurers, reinsurers, other brokers, claims handlers, surveyors, loss adjustors/assessors, accident investigators, specialist risks advisors, pension providers, banks and other lenders (including premium finance providers), health professionals, lawyers, accountants, auditors, consultants, and other like third party professional advisors and service providers, as well as third parties that have referred You to Willis Towers Watson (to the extent their involvement is inherent in or necessary in connection with any of the services provided by Willis Towers Watson);

8.1.2 clients of Willis Towers Watson who receive services which is arranged for Your benefit, or otherwise requires Willis Towers Watson to interact, directly or indirectly, with You (to the extent sharing of Your personal information with such clients is necessary and appropriate in the context of the relevant services Willis Towers Watson provides, see Section 4.1.2 and Section 4.1.3 above – such a client may, depending on the circumstances, be Your employer);

8.1.3 affiliates of Willis Towers Watson and non-affiliated third party services providers (e.g. IT services providers, administrative support service providers, etc.) that provide services that directly or indirectly support Willis Towers Watson's business operation and the services provided by Willis Towers Watson;

8.1.4 credit reference agencies, providers of identity verification services, providers of insurance claims validation services, operators of insurance fraud and other business risk screening databases, and

other like providers of due diligence services (to the extent necessary to comply with legal or regulatory requirements imposed on Willis Towers Watson or a client of Willis Towers Watson); and

8.1.5 regulators, police, courts/tribunals, and other like public authorities who have jurisdiction over Willis Towers Watson (to the extent necessary to comply with any legal or regulatory requirements imposed on Willis Towers Watson or a client of Willis Towers Watson).

8.2 Please note that where Willis Towers Watson shares Your personal information with regulators, police, courts/tribunals, and other like public authorities, Willis Towers Watson may, depending on the circumstances, be forbidden from advising You (or the relevant client of Willis Towers Watson) of the fact that Your personal information was disclosed to or requested by such third parties.

8.3 In all other cases, Willis Towers Watson will not share Your personal information with other third parties without Your prior consent (or the prior consent of the relevant client of Willis Towers Watson, where applicable) unless Willis Towers Watson has a legal ground on which to do so (e.g. where any applicable law requires Willis Towers Watson to do so, or where Willis Towers Watson is compelled to do so by a court order).

## 9. Does Willis Towers Watson transfer my Personal Information overseas?

Due to the international nature of Willis Towers Watson's business operation and the (re)insurance market in which Willis Towers Watson operates, Your personal information may be shared with third parties that are located in countries that do not have laws that protect personal information in the same way laws of Australia or New Zealand do.

9.1 Due to the global nature of Willis Towers Watson's business operation, and the complex and international nature of the many specialist lines of (re)insurance Willis Towers Watson handles, Willis Towers Watson may need to transfer Your personal information across international borders to destinations where the law governing the protection of Your personal information may not be equivalent to the law that applies in Your country.

9.2 Your personal information may be transferred across international borders by Willis Towers Watson to affiliates of Willis Towers Watson and non-affiliated third parties described in Section 8.1 above, who could be located anywhere in the world. As a minimum, such third party recipients based overseas will include other Willis Towers Watson companies that are based in the UK, USA, Philippines and India (who provide IT systems support and administrative/operational support to Willis Towers Watson).

9.3 Please note that where Willis Towers Watson shares Your personal information with other Willis Towers Watson companies or any other third party located overseas, Your personal information will be shared only to the extent it is

necessary to allow such overseas recipients to perform their relevant task. Some overseas recipients might receive all of Your personal information (e.g. Willis Towers Watson companies that supports Willis Towers Watson's IT systems) whilst some overseas recipients will only receive limited amount of Your personal information (e.g. those who assist Willis Towers Watson in performing ID verification etc. will typically only receive basic personal information such as name and date of birth).

9.4 Whenever Willis Towers Watson transfers Your personal information across international borders, Willis Towers Watson will take all appropriate steps that are within Willis Towers Watson's control to take so as to ensure that such transfer complies with the applicable legal requirements.

## 10. How will my Personal Information be kept by Willis Towers Watson?

Willis Towers Watson will keep most of Your personal information in electronic form (typically on IT systems maintained by other Willis Towers Watson companies), although some of Your personal information could be kept in paper form. Willis Towers Watson will keep Your personal information for as long as there is a need for Willis Towers Watson to keep Your personal information for one or more of the purposes Your personal information was originally collected. Your personal information will be handled by Willis Towers Watson securely at all times.

10.1 Most of the personal information Willis Towers Watson collects will be entered into and held by the relevant parts of the IT systems used by Willis Towers Watson (such as client relationship management system, email system, broking system, or accounting system). Such IT systems are typically operated and supported by affiliates of Willis Towers Watson that are located in the UK, USA, Philippines and India, but certain specialist IT systems are maintained by third party service providers.

10.2 Some personal information Willis Towers Watson collects will be kept in paper form (e.g. where Your personal information is included in forms, letters, or files and notes kept by Willis Towers Watson's brokers and advisors, etc.). However, depending on the circumstances, Willis Towers Watson might destroy the paper copies after they have been scanned into Willis Towers Watson's IT systems. Personal information held in paper form will ordinarily be kept on Willis Towers Watson's premises until it is moved to document archives operated third party service providers.

10.3 Whether it exists in electronic form or paper form, Your personal information will be retained by Willis Towers Watson for as long as they are required for one or more of the purposes specified in Section 4. Please note that for legal and regulatory reasons, Willis Towers Watson will often need to retain Your personal information even after Willis Towers Watson stops performing the relevant services which requires Willis Towers Watson to handle Your personal information.

10.4 In particular, please note that due to the way in which (re)insurance works, Willis Towers Watson may need to retain Your personal information for long periods. For example, if Willis Towers Watson arranges an insurance which provides cover for incidents that take place during the term of the policy as opposed to cover for claims that are made during the term of the policy, then Willis Towers Watson may need to keep the relevant records (including personal information) for many years even after the policy is terminated, because a valid claim can potentially be made many years after such a policy has expired.

10.5 Please be assured that Willis Towers Watson treats information security very seriously. Regardless of how Your personal information is kept, the privacy and confidentiality of Your personal information under Willis Towers Watson's control will be protected in accordance with the strict standards set by Willis Towers Watson's Information Security Policy which applies to all members of Willis Towers Watson and is enforced by a dedicated team of experienced security experts.

10.6 Encryption, anti-malware, firewalls, back-up/disaster recovery systems, restriction of access to premises/IT systems, careful selection of personnel as well as relevant third party service providers, and other technical and organizational measures as appropriate will be used to prevent and detect unauthorized or accidental access, loss, disclosure, or other like incident that might affect Your personal information, regardless of whether Your personal data is held physically or electronically.

10.7 In the unlikely and unfortunate event Your personal information under Willis Towers Watson's control becomes compromised due to any information security breach (e.g. unauthorised access, loss, or disclosure/alteration, including where this is caused by contractors), Willis Towers Watson will act promptly to identify the cause of such information security breach, and remediate and mitigate the consequences of such information security breach. Where appropriate, Willis Towers Watson will also notify You (and/or the relevant client of Willis Towers Watson, where applicable) in accordance with any applicable law which requires Willis Towers Watson to notify You about such incidents.

## **11. Does Willis Towers Watson monitor my interaction with Willis Towers Watson in any way?**

To ensure the secure handling of Your personal information and to comply with the relevant legal and regulatory requirements, Willis Towers Watson records and monitors access to its facilities and premises, and in some cases, communications between You and Willis Towers Watson's brokers and advisors as well.

11.1 If You telephone Willis Towers Watson in Australia, Your telephone conversation with Willis Towers Watson's brokers and advisors may be recorded for training, quality monitoring, and regulatory compliance purposes. Where this is the case, You will be given a separate notice about such recording when You telephone Willis Towers Watson.

11.2 If You personally visit any of Willis Towers Watson's office in Australia, Your access to and use of Willis Towers Watson's premises and facilities may, depending on the location of the Willis Towers Watson office, be subject to monitoring via CCTV systems for safety and security reasons.

11.3 Willis Towers Watson also has the capability to monitor the use of its facilities and IT systems by its staff and visitors in general (including access to restricted areas within Willis Towers Watson's premises, use of WiFi facility Willis Towers Watson makes generally available to clients, etc.). Willis Towers Watson may make use of such additional monitoring capability to monitor Your access to Willis Towers Watson's premises, facilities, and IT systems (or Your correspondence with Willis Towers Watson's staff) where this is considered necessary in order to protect the reputation, assets, and confidential/proprietary information, as well as safety/well-being of Willis Towers Watson's clients, workforce, and other stakeholders. Such monitoring forms part of the information security measures deployed by Willis Towers Watson (as described in Section 10 above).

11.4 If You visit any website which is maintained by members of Willis Towers Watson, Your access to and use of such website may be tracked through 'cookies' and other similar technologies. As explained above, the collection of any personal information about You in such cases will be, unless stated otherwise, subject to the separate website privacy notice (see Section 1.3.2 above).

## **12. Will this Privacy Policy change in the future?**

12.1 This Privacy Policy was last updated on the date as stated above. This Privacy Policy may be amended from time to time to reflect changes in law or changes in Willis Towers Watson's business operation, but where such revision becomes necessary in the future, Willis Towers Watson will notify You to the extent it is practicable for Willis Towers Watson to do so.

12.2 If You are a client directly serviced by Willis Towers Watson, You will be notified directly about changes to this Privacy Policy but if You are a customer or employee of a corporate client serviced by Willis Towers Watson (or a claimant bringing claims against such a client of Willis Towers Watson), it may not be practicable for Willis Towers Watson to notify You directly of changes to this Privacy Policy, although Willis Towers Watson will notify its corporate clients about any changes to this Privacy Policy.

12.3 As a minimum, changes to this Privacy Policy will be publicised on:

12.3.1 Willis Towers Watson's website for Australia at <https://www.willistowerswatson.com/en-au>; and

12.3.2 Willis Towers Watson's website for New Zealand at <http://www.willis.com/subsites/newzealand/>

in both cases through a link to 'Privacy Policy' that appears at the bottom frame of the landing page.

### 13. Who can I contact about my Personal Information?

If You wish to exercise Your legal right to access/correct Your personal information, or if You have any query or complaint regarding the handling of Your personal information by Willis Towers Watson, please contact Willis Towers Watson in the first place.

13.1 Under Australia's Privacy Act 1988 or New Zealand's Privacy Act 1993, You have the legal right to access Your personal information held by Willis Towers Watson and to ask Willis Towers Watson to correct or delete Your personal information (e.g. where it is inaccurate or out-of-date). If You would like to exercise this right, or if You have any query or complaint regarding the way in which Your personal information is handled by Willis Towers Watson, please contact:

13.1.1 if You live in Australia:  
Privacy Officer  
Willis Australia Limited  
Level 16, Angel Place  
123 Pitt Street  
Sydney NSW 2000  
Australia  
Telephone: (02) 9285 4000  
Email: aust\_privacy@willis.com

13.1.2 if You live in New Zealand:  
Privacy Officer  
Willis New Zealand Limited  
Level 8  
21 Queen Street  
Auckland 1140  
New Zealand  
Telephone: (0508) 945 547  
Email: aust\_privacy@willis.com

13.2 Willis Towers Watson will endeavour to respond satisfactorily to Your request to access or correct/delete Your personal information, or any question or concern You may have regarding Your personal information. If You are dissatisfied with Willis Towers Watson's response, You can complain to Willis Towers Watson (please see Section 13.1), and Your complaint will be addressed in accordance with Willis Towers Watson's Complaints Handling Procedure, a summary of which is available upon request.

13.3 If Your complaint cannot be resolved satisfactorily through Willis Towers Watson's Complaints Handling Procedure, or if You wish to learn more about Your rights under Australia's Privacy Act 1988 or New Zealand's Privacy Act 1993, You can contact:

13.3.1 if You live in Australia:  
Office of the Australian Information Commissioner  
Level 3  
175 Pitt Street  
Sydney NSW 2000  
Australia  
<http://www.oaic.gov.au/>  
Telephone: 1300 363 992  
Email: enquiries@oaic.gov.au

13.3.2 if You live in New Zealand:  
The Privacy Commissioner's Office  
Level 4  
109-111 Featherston Street  
Wellington 6143  
New Zealand  
<http://privacy.org.nz/>  
Telephone: 0800 803 909  
Email: enquiries@privacy.org.nz