

Willis Re Japan K.K. : Data Protection and Personal Information Privacy Policy

Prepared on : 31st July, 2017

Willis Re Japan K.K.

1. **Data Protection and Personal Information Privacy Policy** :

- We will commit to safeguarding the privacy and confidentiality of Information provided by our clients in the course of business transaction (as stated below (*)) which, at any time, are not supposed to be disclosed to a third party (hereinafter referred to as "Data"). Especially in respect of personal information which may be inclusive in the Data, we recognise the importance of the protection of privacy and confidentiality, we will commit to safeguarding the privacy and confidentiality complying with applicable laws and regulations and in accordance with Internal Guideline of Willis Towers Watson.

(*) Our business objectives:

- (i) Insurance broker for reinsurance contracts, alternative solutions business, and consulting business relating thereto;
- (ii) Risk management consulting business relating to corporate management; and
- (iii) Any and all businesses relating or incidental to any of the foregoing items

2. **Personal Information etc.** :

- How to obtain personal information
We will obtain personal information by legally fair means. Personal information we obtained in the course of business will be treated complying with applicable laws and regulations etc. and safely managed within a defined place and handled by an appointed administrator. We will not obtain personal information including My Number (Personal Identification Information), which is unnecessary for our business transaction.
- What is personal information
Definition of "personal information", "personal information requiring special care" etc. will follow "Act on the Protection of Personal Information" in Japan and guidelines on personal Information protection provided by each relevant ministry.
"Personal information" which we may hold, includes information that will be able to identify the individual e.g. name, address, email-address, telephone number.
- Purpose of our use of personal information:
We will use personal information obtained in the course of business for the following purposes:
 - For the work necessary for our business transaction (arrangement of reinsurance, modelling etc.)
 - For the delivery of information and news to our clients
 - For invitation to events, seminars etc. for events organised by Willis Re
 - For requesting cooperation from our clients on research and development, surveys etc.
 - For communication with clients by e-mail etc.
 - For any and all businesses relating or incidental to any of the foregoing items

3. **Management of Personal Information and Data** :

- Papers and/or soft files etc. which contain personal information will be managed through registration in the “Personal Data Management Book” set forth separately.
- Director responsible for Compliance is responsible for management of Data

4. **Disclosure of personal information to others** :

We will not disclose any personal information we hold to others without prior consent of the individual except:

- (1) Cases where we are required by laws and regulations
- (2) Cases in which the disclosure is necessary for the preservation of life, health, or property and in which it is difficult to obtain the consent of the person
- (3) Cases in which the disclosure is necessary in particular for improving public health or promoting the sound development of children and in which it is difficult to obtain the consent of the person
- (4) Cases in which the disclosure is necessary for cooperation with a state organ, a local government, or an individual or a business operator entrusted by one in executing affairs prescribed by laws and regulations and in which obtaining consent of the person is likely to impede the execution of the affairs
- (5) Cases in which the disclosure is necessary to Willis Towers Watson companies to the extent necessary to ensure operations of our business
- (6) Cases in which the disclosure is necessary to our administrative supporter to the extent necessary to ensure operations of our business

Data which will be shared with Willis Limited in accordance with the provision (5) above will be treated in accordance with provisions stated in “General Terms of Business Agreement for our Reinsurance clients (TOBA) - Data Protection and Confidentiality” as agreed between Willis Limited and our clients.

5. **Reporting and recording etc.** :

(1) Personal Information

- In case an incidence of personal information leakage is discovered, details of which shall be immediately reported to the board of directors with cc to the Compliance Director - Reinsurance of WTW.
- When it is judged to be the case, it will be reported to FSA (Kanto Local Finance Bureau) and notified to the individual(s) concerned as soon as practicable. At the same time, reasonable measures for recurrence prevention will be taken as soon as practical to prevent such an incidence occurring secondary damage and/or a repeat of a similar information leakage incident.

(2) Recording

- In order to manage the leak of information, a record of the process will be made in the Complaint Registration Book at the time of a potential discovery, regardless of the outcome.
- (3) Continued Improvement of our operation by utilizing the PDCA Cycle (Plan, Do, Check, Act)
- We will make utmost endeavour to safeguard the personal Information by providing our employees with necessary education on proper treatment of personal information and promoting enlightenment continuously.

Our main business is in the capacity of an insurance broker for reinsurance contracts. We will establish personal information protection inquiries desk as below, who will respond to questions, inquires, complaints and any other matters pertaining to personal information:

Makoto Goto, Director (E-mail: Makoto.Goto@WillisTowersWatson.com)

Tel: +81 (0)3 3500 2524

Office Hour: 9:30am~5:30pm weekdays

End