

Please read this Privacy Notice carefully. It describes how **Willis** handles personal information about **You** which **Willis** collects in connection with the services **Willis** provides in **South Africa**. It also explains certain legal rights **You** have in connection with **Your** personal information which is handled by **Willis**. This Privacy Notice may be revised from time to time to reflect changes in law or changes in **Willis's** business operation. This Privacy Notice was last updated on **1 January 2015**.

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

This Privacy Notice explains how **Willis** handles personal information about **You**. Generally speaking, this Privacy Notice will apply to **You** if **You** directly or indirectly benefit from the services **Willis** provides (typically insurance-related) in **South Africa**.

- 1.1 In many countries around the world (including **South Africa**), 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 This Privacy Notice is produced pursuant to Section 18 of South Africa's Protection of Personal Information Act 2013, and its purpose is to inform **You** how **Willis** handles personal information about **You** (i.e. any information which relates to **You**) which **Willis** obtains in connection with its business activities.
- 1.3 This Privacy Notice will apply to **You** if **Willis** in **South Africa** obtains **Your** personal information in connection with **Willis's** business activities. Please note that this Privacy Notice does not apply to **You** if **You** are:
 - 1.3.1 an employee, contractor, or any other type of worker engaged by **Willis**.
 - 1.3.2 a visitor to any website which is maintained by the Willis Group (including the Willis Group's main website at <http://www.willis.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 the Willis Group can be found at:

http://www.willis.com/Privacy_Policy/
 - 1.3.3 a private client directly serviced by Global Wealth Solutions (a division of **Willis**), in which case **Your** personal information will be handled in accordance with the separate GWS Privacy Notice which can be found at:

<http://www.willis.com/GWS/Privacy/>
- 1.4 Nothing in this Privacy Notice alters any existing relationship between **You** and **Willis**, or creates any new relationship between **You** and **Willis**. Nothing in this Privacy Notice affects any right **You** have under any applicable law which regulates the way in which **Willis** handles **Your** personal information.

2 Who at Willis is responsible for the handling of my Personal Information?

Generally speaking, one of the Willis Group companies located in **South Africa** will be responsible for ensuring that **Your** personal information is handled properly by **Willis**. The

particular company responsible will vary depending a number of factors, such as **Your** relationship with **Willis** and the nature of the services provided by **Willis**.

- 2.1 **Willis** is a leading global risk advisor and insurance/reinsurance broker that operates around the world. The ultimate parent and holding company of the Willis Group is Willis Group Holdings 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 Willis Group company who is responsible for the handling of **Your** personal information in connection with the services provided by **Willis** in **South Africa** will vary depending on a number of factors, such as the nature of the services provided by **Willis** and **Your** relationship with **Willis** (or **Willis's** client).
- 2.3 Unless indicated otherwise, and generally speaking, where **Willis** handles **Your** personal information in connection with:
 - 2.3.1 broking of insurance and employee benefits such as group pension/medical insurance, and other like services, the responsible company is:

Willis South Africa (Pty) Ltd, Illovo Edge, No. 1 Harries Road, Illovo, Sandton 2196, South Africa.
 - 2.3.2 broking of reinsurance and other services relating to reinsurance, the responsible company is:

Willis Re (Pty) Ltd, First Floor, Building 3, Inanda Greens Office Park, 54 Wierda Road West, Wierda Valley 2196, South Africa.

3 What Personal Information about me does Willis collect?

Personal information collected by **Willis** 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** collects will vary depending on various factors, including **Your** personal circumstances, the nature of **Your** relationship with **Willis** (or **Willis's** client), and the relevant services provided by **Willis**, 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, South African ID 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** 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** handles in connection with the services **Willis** provides to **You** or a client of **Willis**, such as **Your** personal circumstances that need to be described in arranging any (re)insurance for **You** or a client of **Willis**, 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** is asked to advise a client; and
 - 3.1.8 other information about **You** which **Willis** collects as part of its day-to-day business operation, such as information about **Your** visit to **Willis's** office, **Your** attendance at meetings and events hosted by **Willis**, and **Your** correspondence with **Willis's** brokers and advisors.
- 3.2 Please note that personal information which **Willis** collects may include information that constitutes “special personal information” such as information about **Your** racial/ethnic origin, religious/philosophical/political views or affiliations, membership of trade union or professional/trade association, sexual preference, criminal record or alleged commission of crime, and health.
- 3.3 **Willis** 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 collect my Personal Information?

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

- 4.1 **Willis** 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** 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** to arrange health plan, pension plan, or other forms of employee benefits, or where a client of **Willis** asks **Willis** 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's** client and requires **Willis** to interact, directly or indirectly, with **You** (e.g. where **You** bring a claim against **Willis's** client and **Willis** is required to handle the claim under the relevant (re)insurance policy).
- 4.2 **Willis** also collects and uses **Your** personal information for the following related purposes:
- 4.2.1 to enable underwriters, actuaries, (re)insurers, 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**);

- 4.2.2 to enable affiliates of the Willis Group and non-affiliated third party services providers (e.g. IT service providers, administrative support service providers, etc.) to provide services that directly or indirectly support **Willis's** business operation and the services provided by **Willis**;
 - 4.2.3 to comply with legal or regulatory requirements imposed on **Willis** or a client of **Willis** (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** 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** in connection with the services provided by **Willis**, and to keep **You** informed about the products, services, and opportunities offered by **Willis** and other members of the Willis Group which might be of interest or benefit to **You**.
- 4.3 For the purpose of improving or developing **Willis's** products and services (see Section 4.2.4 above), **Willis** 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 Unless agreed otherwise with **You** (or the relevant client of **Willis**), **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** or if **You** are the business contact at **Willis'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's** direct marketing practice, please refer to Section 7 below.
- 4.5 Please note that **Willis** 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**, where applicable).

5 How does Willis obtain my Personal Information?

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

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

Client Privacy Notice – Willis South Africa

- 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** 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** and **Your** job involves any direct interaction with **Willis** (e.g. if **You** are a Risk Manager or a Finance Director of a client of **Willis**, and **You** are involved in making (re)insurance purchase decisions);
 - 5.2.2 **You** directly interact with **Willis** as a client of **Willis** 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's** services in connection with **Your** business needs);
 - 5.2.3 **You** are an individual to be insured by a client of **Willis** or a beneficiary of any insurance, pension, or similar benefit a client of **Willis** arranges for **Your** benefit and **Willis** is required to collect **Your** personal information directly from **You** in order to make the necessary arrangements for **Willis's** client;
 - 5.2.4 **You** bring any insurance claim against a client of **Willis** and where **Willis** is involved in the direct handling of such claim (or the corresponding reinsurance claim); or
 - 5.2.5 **Willis** needs to talk to **You** or correspond with **You** in order to provide risk management consultancy or other like advisory services to **Willis's** clients.
- 5.3 Depending on the circumstances, **Willis** may also obtain **Your** personal information from other sources such as:
- 5.3.1 third parties who refer **You** to **Willis** (examples of third parties who might refer **You** to **Willis** can include **Your** employer, clubs or associations **You** belong to, merchants and service providers with whom **You** do business, or **Your** colleagues or business associates);
 - 5.3.2 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
 - 5.3.3 underwriters, actuaries, (re)insurers, 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 who interact with **Willis** in connection with the services **Willis** provides.

6 Do I have to give my Personal Information to Willis or allow Willis to handle my Personal Information?

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

6.1 It is not mandatory for **You** to provide any personal information **Willis** asks **You** to provide or for **You** to consent to **Willis** 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** if **You** change **Your** mind.

6.2 However, if **You**:

6.2.1 refuse to provide **Your** personal information which **Willis** requests;

6.2.2 do not consent to **Willis** handling **Your** personal information in accordance with this Privacy Notice; or

6.2.3 revoke any consent regarding the handling of **Your** personal information by **Willis** which **You** have previously given,

then such refusal or revocation of previously given consent might prevent **Willis** 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 If **You** consent to the collection and processing of **Your** personal information by **Willis** but later revoke **Your** consent, **Willis** will endeavour to comply with **Your** request but there may be circumstances where **Willis** 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** will not be able to ‘undo’ a disclosure that has already taken place).

6.4 Additionally, where there is a relevant legal exemption that applies to the way in which **Willis** collects and processes **Your** personal information, **Willis** 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** 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** would otherwise be prevented from providing the services as requested by **Willis’s** client).

7 Does Willis use my Personal Information for Marketing?

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

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

7.2 Where **Willis** sends any such marketing communication to **You**, **Willis** 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** 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**, where applicable). For further clarification regarding how **Willis** shares **Your** personal information with third parties, please see Section 8 below.

8 Does Willis share my Personal Information with third parties?

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

- 8.1 **Willis** 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** may share **Your** personal information with the following types of third parties:
- 8.1.1 underwriters, actuaries, (re)insurers, 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** (to the extent their involvement is inherent in or necessary in connection with any of the services provided by **Willis**);
 - 8.1.2 clients of **Willis** who receive services which is arranged for **Your** benefit, or otherwise requires **Willis** 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** 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 the Willis Group and non-affiliated third party services providers (e.g. IT service providers, administrative support service providers, etc.) that provide services that directly or indirectly support **Willis’s** business operation and the services provided by **Willis**;
 - 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** or a client of **Willis**); and
 - 8.1.5 regulators, police, courts/tribunals, and other like public authorities who have jurisdiction over **Willis** (to the extent necessary to comply with any legal or regulatory requirements imposed on **Willis** or a client of **Willis**).
- 8.2 Please note that where **Willis** shares **Your** personal information with regulators, police, courts/tribunals, and other like public authorities, **Willis** may, depending on the circumstances, be forbidden from advising **You** (or the relevant client of **Willis**) of the fact that **Your** personal information was disclosed to or requested by such third parties.
- 8.3 In all other cases, **Willis** will not share **Your** personal information with other third parties without **Your** prior consent (or the prior consent of the relevant client of **Willis**, where

applicable) unless **Willis** has a legal ground on which to do so (e.g. where any applicable law requires **Willis** to do so, or where **Willis** is compelled to do so by a court order).

9 Does Willis transfer my Personal Information overseas?

Due to the international nature of **Willis's** business operation and the (re)insurance market in which **Willis** 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 **South Africa** do.

- 9.1 Due to the global nature of **Willis's** business operation, and the complex and international nature of the many specialist lines of (re)insurance **Willis** handles, **Willis** 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 **South Africa**.
- 9.2 **Your** personal information may be transferred across international borders by **Willis** to affiliates of the Willis Group 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 Group companies that are based in the UK, USA, and India (who provide IT systems support and administrative/operational support to **Willis**).
- 9.3 Please note that where **Willis** shares **Your** personal information with other Willis Group 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 Group companies that support **Willis's** IT systems) whilst some overseas recipients will only receive limited amount of **Your** personal information (e.g. those who assist **Willis** in performing ID verification etc. will typically only receive basic personal information such as name and date of birth).
- 9.4 Whenever **Willis** transfers **Your** personal information across international borders, **Willis** will take all appropriate steps that are within **Willis's** control to take so as to ensure that such transfer complies with the applicable legal requirements.

10 Will my Personal Information be kept secure by Willis?

Willis takes the privacy and confidentiality of **Your** personal information very seriously. **Your** personal information will be protected in accordance with the strict information security standards that apply across the Willis Group, including **Willis** in **South Africa**.

- 10.1 Please be assured that **Willis** treats information security very seriously. Regardless of how **Your** personal information is kept, the privacy and confidentiality of **Your** personal information under **Willis's** control will be protected in accordance with the strict standards set by Willis Group's Information Security Policy which applies to all members of the Willis Group and is enforced by a dedicated team of experienced security experts.
- 10.2 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.
- 10.3 In the unlikely and unfortunate event **Your** personal information under **Willis'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** 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** will also notify the Information Regulator (see Section 13.5 below) and **You** (and/or the relevant client of **Willis**, where applicable) in accordance with any applicable law which requires **Willis** to notify the Information Regulator and **You** about such incidents.

11 Does Willis monitor my interaction with Willis in any way?

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

- 11.1 **Willis** 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's** premises, use of WiFi facility **Willis** makes generally available to clients, etc.). **Willis** may make use of such monitoring capability to monitor **Your** access to **Willis's** premises, facilities, and IT systems (or **Your** correspondence with **Willis'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's** clients, workforce, and other stakeholders. Such monitoring forms part of the information security measures deployed by **Willis** (as described in Section 10 above).
- 11.2 If **You** visit any website which is maintained by members of the Willis Group, **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).
- 11.3 If **You** visit **Willis's** website for **South Africa** at <http://www.willis.co.za/>, for systems administration purposes and to improve this website and its operation, **Willis's** IT systems will automatically:
- 11.3.1 detect and record **Your** IP address (which generally speaking is not linked to any of **Your** personal information held by **Willis**) and other non-personal information from which **Willis** cannot identify **You** (such as the type of internet browser and device **You** use to access **Willis's** websites); and
 - 11.3.2 store one or more 'cookies' (see Section 11.4 below) on **Your** computer or other device from which **You** access the website to improve the websites and the services provided through the website (e.g. by analysing how the website is used and how visitors arrive to the website).
- 11.4 A 'cookie' is a small file that websites transfer to **Your** device to store and sometimes collect information about **Your** usage of websites. **You** can control the way in which cookies are used by altering **Your** browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.aboutcookies.org> or <http://www.allaboutcookies.org>.

12 Will this Privacy Notice change in the future?

This Privacy Notice was last updated on **1 January 2015**. **Willis** may need to revise this Privacy Notice from time to time to reflect changes in law or changes in its business operation.

- 12.1 This Privacy Notice was last updated on **1 January 2015**. This Privacy Notice may be amended from time to time to reflect changes in law or changes in **Willis's** business operation, but where such revision becomes necessary in the future, **Willis** will notify **You** to the extent it is practicable for **Willis** to do so.

- 12.2 If **You** are a client directly serviced by **Willis**, **You** will be notified directly about material changes to this Privacy Notice but if **You** are a customer or employee of a corporate client serviced by **Willis** (or a claimant bringing claims against such a client of **Willis**), it may not be practicable for **Willis** to notify **You** directly of changes to this Privacy Notice, although **Willis** will notify its corporate clients about material changes to this Privacy Notice.
- 12.3 As a minimum, changes to this Privacy Notice will be publicised on **Willis's** website for **South Africa** at <http://www.willis.co.za/privacy>.

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**, please contact **Willis** in the first place.

- 13.1 Under South Africa's Protection of Personal Information Act 2013, **You** have certain legal rights pertaining to **Your** personal information, including the right to ask **Willis** to:

- 13.1.1 confirm whether or not **Willis** handles **Your** personal information;
- 13.1.2 grant access to **Your** personal information held by **Willis**;
- 13.1.3 correct, destroy, or delete **Your** personal information, if **Your** personal information held by **Willis** is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or was obtained illegally; and
- 13.1.4 stop using **Your** personal information in particular ways, for example to stop using **Your** personal information for direct marketing purpose.

- 13.2 If **You** would like to exercise any of **Your** legal rights mentioned above, or if **You** have any query or complaint regarding the way in which **Your** personal information is handled by **Willis**, please contact:

- 13.2.1 if **You** wish to direct **Your** query at **Willis's** retail insurance and employee benefits operation:

Compliance Officer
Willis South Africa (Pty) Ltd
Illovo Edge
No. 1 Harries Road
Illovo
Sandton 2196
South Africa

Tel: +27-11-535-5400 Email: compliancesa@willis.com

- 13.2.2 if **You** wish to direct **Your** query at **Willis's** reinsurance operation:

Compliance Officer
Willis Re (Pty) Ltd
First Floor, Building 3
Inanda Greens Office Park
54 Wierda Road West
Wierda Valley 2196
South Africa

Tel: +27-11-341-9600 Email: wrecompliance@willis.com

- 13.3 Please note that **Your** right to access and correct/delete **Your** personal information could be subject to certain legal exemptions, and where any legal exemption applies, **Willis** might not be able to comply with **Your** request to access or correct/delete **Your** personal information.
- 13.4 Further information regarding how **You** can request access to or correction/deletion of **Your** personal information, including the explanation of the circumstances in which **Willis** might decline to comply with **Your** request and the explanation of charges that may apply to the handling of **Your** request, is set out in **Willis's** PAIA s51 Manual, which is available from **Willis's** website at <http://www.willis.co.za/privacy>, or upon request.
- 13.5 **Willis** will endeavour to respond satisfactorily to **Your** request to access or correct/delete **Your** personal information, or any question, concern, or complaint regarding **Your** personal information **You** raise with **Willis**. However, if **You** are dissatisfied with **Willis's** response and wish to make a formal complaint about the way in which **Willis** has handled **Your** personal information (or if **You** wish to learn more about **Your** rights under South Africa's Protection of Personal Information Act 2013), **You** can contact the Information Regulator, an independent regulatory authority to be established under South Africa's Protection of Personal Information Act 2013.
- 13.6 As at the effective date of this Privacy Notice, the Information Regulator has not yet been established but once it becomes operational, this Privacy Notice will be revised to include their contact details.