
Please read this Privacy Notice carefully. It describes how **Willis** handles personal information about **You** which **Willis** collects in connection with **Your** employment or other engagement by **Willis** 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**. This Privacy Notice will apply to **You** if **You** are actually or prospectively employed or otherwise engaged by **Willis** 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 its workforce in **South Africa**. This Privacy Notice will apply to **You** if **Willis** in **South Africa** actually or prospectively engages **You** as an employee or in any other capacity (e.g. job applicant, intern, temporary staff, or contractor).
- 1.3 Nothing in this Privacy Notice alters or should be construed as altering any existing legal relationship between **You** and **Willis**, or creating a new employment relationship or any other 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 **Your** relationship with **Willis** and the nature of **Your** engagement 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 Unless **Your** contract of employment or engagement expressly states otherwise, the particular Willis Group company who is responsible for the handling of **Your** personal information by **Willis** in South Africa is:
 - 2.2.1 if **You** are employed or otherwise engaged by **Willis** in connection with **Willis's** retail insurance business (including the employee benefits business):

Willis South Africa (Pty) Ltd, Illovo Edge, No. 1 Harries Road, Illovo, Sandton 2196, South Africa.
 - 2.2.2 If **You** are employed or otherwise engaged by **Willis** in connection with **Willis's** reinsurance business:

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 and the nature of **Your** relationship with **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** remuneration, tax status, income tax and other like levies, pension/insurance arrangements, expenses claims, and corporate credit card usage;
 - 3.1.5 information about **Your** physical and mental health, including **Your** medical history, description of illness or injury suffered, sickness absence, and any specific treatment received;
 - 3.1.6 information about **Your** performance at work, including references obtained from **Your** previous place of work, as well as opinions expressed by **Your** subordinates, peers, supervisors, and clients of **Willis**;
 - 3.1.7 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, **Your** criminal history (including allegations of crimes), **Your** creditworthiness and bankruptcy record, and details of any accident **You** may become involved in whilst at work;
 - 3.1.8 other information about **You** which **Willis** collects as part of its day-to-day business operation or human resources administration, including but not limited to, information about **Your** usage of **Willis's** facilities/premises and IT systems (e.g. websites visited and emails sent/received using **Willis's** IT systems) and **Your** participation in or acceptance of any scheme or benefit arranged by **Willis** for its workforce (e.g. company car scheme, group personal pension plan, group medical plan, and share purchase plan).
- 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, as well as information about **Your** physical or mental health (including **Your** medical history, sickness absence record, and any disability **You** may have).
- 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 ensure that **Willis** can properly administer the relationship with **Willis's** workforce, and to ensure that **Willis** complies with the relevant legal, regulatory, or contractual obligations that are imposed on **Willis**, 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 ensure that **Willis** effectively fulfils, manages, develops, and administers all aspects of its actual or prospective relationship with **You** and **Willis's** workforce in general (including in connection with matters such as recruitment, performance at work, remuneration, pension and other similar benefit(s));
- 4.1.2 to ensure that **Willis** complies with all relevant legal obligations that apply to **Willis** as the company that employs or otherwise engages **You** (including those relating to equal opportunity, anti-discrimination practices, health and safety at work, and (re)integration of workers with disability or illness); and
- 4.1.3 to ensure that **Willis** complies with all other legal, regulatory, or contractual obligations that are applicable to its business operation in general, including any legal obligation imposed on **Willis** as a regulated business (such as regulatory compliance) or any contractual obligation **Willis** owes to its clients (such as obligation of confidentiality). Please note that as part of this purpose, **Willis** may use **Your** personal information to verify **Your** background, identity, credentials, financial status, etc. (which may in turn involve, where permitted by applicable law, **Willis** handling personal information about **You** of a sensitive nature, such as any criminal record **You** may have), either prior to formally engaging **You**, or from time to time after **Willis** has formally engaged **You**, in any capacity.

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

- 4.2.1 to enable third parties who support **Willis's** business operations and human resources administration (e.g. payroll service providers, providers of group insurance/pension, application service providers, IT infrastructure support service providers, telephone companies, banks, accountants, lawyers, consultants, recruitment agency, and temporary staffing agency) to perform their relevant tasks;
- 4.2.2 to enable third parties to provide any information, product, or service **You** request in connection with any form of benefit or facility which **Willis** may make available to **You**;
- 4.2.3 to facilitate **Willis's** day-to-day business operation in general, including commercial transactions conducted between **Willis** and third parties such as clients, (re)insurers, other intermediaries, and vendors/suppliers, as well as other arrangements between **Willis** and third parties such as professional bodies and industry associations; and
- 4.2.4 to create aggregated, anonymous statistics to analyse market trends for salaries for employees, hourly/day rates for contractors, retention/attrition, and other like matters to improve the way in which **Willis** engages its workforce in general (no specific personal information relating to **You** or any information from which **You** could be identified will be included in such analysis).

4.3 Please note that not all of **Your** personal information will be used by **Willis** for all of the aforementioned purposes. **Willis** will only use **Your** personal information to the extent it is appropriate and necessary in the context of the relevant purpose. For example:

- 4.3.1 If **You** are a job applicant, **Willis** may retain **Your** personal information on its file for record keeping purposes even if **Your** application is unsuccessful, but **Willis** will use such retained personal information only where there is a good reason for doing so (e.g. to contact **You** about an appropriate job opening different from the one **You** have applied for).
- 4.3.2 If **You** cease to be employed or engaged by **Willis**, **Willis** may retain **Your** personal information on its file for record keeping purposes but **Willis** will use such retained personal information only where there is a good reason for doing so (e.g. to maintain appropriate tax/finance records, or to respond to request for references).
- 4.3.3 **Your** private contact details (such as **Your** personal mobile phone number or email address) will not be used in the context of **Willis's** day-to-day business unless there is a good reason for doing so (e.g. when there is a need to ascertain **Your** safety after a major disaster/incident, or a critical business transaction requires **Your** involvement whilst **You** are away on holiday).
- 4.3.4 **Your** “special personal information” such as information concerning **Your** racial/ethnic origin or mental/physical health will only be used where this is strictly necessary, for example to monitor **Willis's** compliance with law concerning equal opportunity and anti-discrimination practices, or to facilitate **Your** rehabilitation and return to work.

5 How does Willis obtain my Personal Information?

Willis typically obtains **Your** personal information directly from **You**. However, depending on the circumstances, **Willis** might obtain **Your** personal information indirectly from other third parties such as recruitment agency that has referred **You** to **Willis**.

- 5.1 **Willis** typically obtains **Your** personal information directly from **You**, but depending on the circumstances, **Willis** might obtain **Your** personal information indirectly from third parties that have referred **You** to **Willis** (e.g. recruitment agency, temporary staffing agency, etc.) or third parties who provide references for **You** (e.g. **Your** former employer, current employer, etc.).
- 5.2 **Willis** may also obtain **Your** personal information through operators of websites where **You** have voluntarily made **Your** personal information accessible (e.g. efinancialcareers.com or linkedin.com). Additionally, depending on **Your** relationship with **Willis**, **Willis** may also collect **Your** personal information from other sources such as credit reference agencies, publicly accessible registers and databases, **Your** bank, **Your** doctor, and so on.

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 employing or otherwise engaging **You**, or adversely affect **Willis's** ability to engage or continue to engage **You**.

- 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 employing or engaging **You**).

7 Does Willis use my Personal Information for Marketing?

Willis does not engage in direct marketing that targets its workforce in general. However, depending on **Your** relationship with **Willis**, **You** might receive communications from **Willis** regarding job opportunities at **Willis**, or goods/services offered as part of benefits **Willis** makes available to its workforce.

- 7.1 **Willis** does not engage in direct marketing activities that target its workforce in general, but if **You** are a past or current job applicant, **You** might from time to time receive communications from **Willis** regarding job opportunities at **Willis**.
- 7.2 Additionally, if **You** are employed or otherwise engaged by **Willis**, **You** might from time to time receive communications from **Willis** regarding products and services which **Willis** makes available as part of benefits granted to **Willis's** workforce (including products and services which are made available by third parties), but such communications will only be sent to **Your** office or **Your** email account at **Willis**.
- 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. 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 only where such disclosure is consistent with the purposes for which **Willis** obtained **Your** personal information.

- 8.1 **Willis** will share **Your** personal information with third parties only to the extent it is necessary for the purposes outlined in Section 4 above. Specifically, **Willis** may share **Your** personal information with the following third parties:

- 8.1.1 those who are involved in supporting **Willis's** business operations and human resources administration (e.g. payroll service providers, providers of group insurance/pension, application service provider, IT infrastructure support service providers, telephone companies, banks, accountants, lawyers, consultants, recruitment agency, and temporary staffing agency), including other members of the Willis Group as well as non-affiliated third party service providers;
 - 8.1.2 third party providers of product and services which **You** request in connection with any form of benefit or facility which **Willis** may make available to **You**;
 - 8.1.3 counterparties to commercial transactions conducted by **Willis** as part of its day-to-day business operation;
 - 8.1.4 professional bodies, industry associations, conference organisers, and other similar third parties that **Willis** engages as part of its day-to-day business operation; and
 - 8.1.5 regulators, courts/tribunals, law enforcement bodies, and other similar third parties with whom Willis either: (a) is obliged to share **Your** personal information for legal and regulatory reasons; or (b) decides to cooperate voluntarily where there is a good business reason for doing so. Please note that where **Willis** shares **Your** personal information with such third parties, **Willis** may, depending on the circumstances, be forbidden from advising **You** of the fact that **Your** personal information was disclosed to or requested by such third parties (e.g. where this may prejudice an on-going police investigation or judicial inquiry).
- 8.2 In all other cases, **Willis** will not share **Your** personal information with other third parties without **Your** prior written approval and where any other third party requests access to **Your** personal information, **Willis** will not comply with such request without **Your** prior written approval, 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, **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, **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.

- 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.
- 10.4 Please note that **Your** use of **Willis's** IT systems (including any computers, mobile devices, and network storage facility) is subject to other applicable policies and procedures, and to the extent **You** use **Willis's** IT systems for private purposes (e.g. by emailing or storing **Your** personal information for **Your** own private use), **You** will do so at **Your** own risk and **Willis** will not be liable for anything that happens as a result of **Your** personal use of **Willis's** IT systems.

11 Does Willis monitor me at work?

To ensure the secure handling of **Your** personal information and other information under **Willis's** control, and to comply with the relevant legal, regulatory, and contractual requirements, **Willis** records and monitors access to its facilities and premises. Such monitoring will include **Your** use of **Willis's** IT systems and other resources.

- 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, access to the Internet via **Willis's** network, emails sent or received using a **Willis** email account, etc.).
- 11.2 **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** clients) 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.

- 11.3 Such monitoring forms part of the information security measures deployed by **Willis** (as described in Section 10 above) and any personal information about **You** which is handled by **Willis** as a result of such monitoring will be subject to additional safeguards, including policies and procedures pertaining to access to monitoring facility or personal information collected through such monitoring.

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 employed or otherwise directly engaged by **Willis**, **You** will be notified directly about material changes to this Privacy Notice but if **You** do not have a direct interaction with **Willis**, it may not be practicable for **Willis** to notify **You** directly of 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** are employed or otherwise engaged by **Willis** in connection with **Willis's** retail insurance business (including the employee benefits business):

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** are employed or otherwise engaged by **Willis** in connection with **Willis's** reinsurance business:

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.