

## RISK INTELLIGENCE CENTRAL PRIVACY NOTICE

**Last Updated: April 2018**

### RISK INTELLIGENCE CENTRAL PRIVACY NOTICE

Risk Intelligence Central is provided on behalf of all [affiliates](#) worldwide within the Willis Towers Watson Group which form part of the global Corporate Risk and Broking business (hereafter referred to as “**We**” or “**Willis Towers Watson**”).

This Privacy Notice only applies to **Risk Intelligence Central** and to **Risk Intelligence Policy Summaries** and **Risk Intelligence Market Security** which are both applications available within **Risk Intelligence Central**.

Risk Intelligence Central is a web-based platform that provides data and information and allows clients to manage their documents. Risk Intelligence Central is only provided to clients who receive Corporate Risk and Broking from Willis Towers Watson or other third parties that help Willis Towers Watson to provide these services and the legal basis for processing your Personal Information if it is necessary for the Online Terms of Use, and also for the legitimate business interests of Willis Towers Watson in providing CRB Services and Risk Intelligence Central. Risk Intelligence Central can be accessed via a web portal called One Place.

This privacy notice describes how we handle personal information collected through your use of **Risk Intelligence Central (“Websites”)**. In this notice we use “**Personal Information**” to mean information that identifies you as an individual or relates to an identifiable individual.

#### **1. Personal Information that we may collect from you**

Personal Information that we may collect through the websites includes your:

- Employer or Company’s Name
- full name and title
- Business address or place of work
- Job Title and / or role
- Preferred Language
- Contact details such as email, telephone and mobile telephone numbers
- Your preferences such as contact restrictions and preferred method of contact

Once you are accessing and using Risk Intelligence Central, we may also capture:

- information regarding your dealings with us;
- any interest you have in relation to our services or our practice areas; and
- any information you may voluntarily submit to us by completing any form within One Place or Risk Intelligence Central; and
- details of your usage of Risk Intelligence Central such as dates and durations of access.

We may collect this Personal Information in various ways:

- from any form you may complete and submit, for example information collected from the “Contact Us” page of our applications;
- from the content of messages, documents and surveys that you may complete on our Websites;

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- from session ‘cookies’ and other similar tools deployed on parts of our Websites that can only be accessed by authenticated users who are logged into the Website (for further information regarding cookies used on our Websites, please see Section 4 below)
- when you provide information as a client in connection with professional services provided by us.

### **2. How we may use your personal information**

We may use Personal Information about you for our legitimate business interests, including the following:

- to provide the access to Risk Intelligence Central including Risk Intelligence Policy Summaries and Risk Intelligence Market Security;
- to facilitate your participation in interactive features you may choose to use on these applications and to personalize your experience by presenting content tailored to you;
- to correspond with you, notify you of events or changes to our Websites and services, or otherwise to fulfill your requests and respond to your queries and requests for information; and
- for the purposes of providing services to you via our applications; such services will be subject to separate terms and conditions;
- for our business purposes, such as data analysis, audits, fraud monitoring and prevention, and developing new products, enhancing, improving or modifying our Websites, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

### **3. How we share your Personal Information**

We may disclose your Personal Information to our [affiliates](#) for the uses and purposes set out above.

We may also disclose your Personal Information to third parties for the following reasons:

- to third party service providers, which may include recipients outside your country of residence, such as entities providing customer service, email delivery, auditing, hosting and supporting our Website and providing other services to Willis Towers Watson including the provision of applications, software and externally hosted platforms which may form part of the Websites;
- if we are obliged to disclose your Personal Information under applicable law or regulation, which may include laws outside your country of residence;
- in order to enforce or apply our Website terms of use, or to protect the rights, privacy, safety or property of Willis Towers Watson, our clients, Affiliates or other third parties including third party service providers;
- to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
- in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings);

### **4. Other information that we may collect**

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. We may collect Other Information in various ways.

For instance, when you visit our Websites, we may record your IP address. Your **IP address** is a unique series of numbers that uniquely identifies your computer on the Internet. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Websites. We may also derive your approximate location and company details from your IP address. We may also gather Other Information about your computer such as the type of your internet browser, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, and the name and version of the Websites you are using, which we use to provide you with a more effective service.

**Cookies:** Additionally, when you visit our Websites, we may store a ‘cookie’ on the hard drive of your computer. Cookies are small text files that a website transfers to your hard drive to store and sometimes collect information about your usage of websites, such as time spent on the Websites, pages visited, language preferences, and other anonymous traffic data. We use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while using the Websites and to recognize your computer in order to assist your use of the Websites. We also gather statistical information about use of the Websites in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. The data stored by these cookies is encrypted.

You can control the way in which cookies are used by altering your browser settings. You may refuse to accept cookies by activating the setting on your browser that allows you to reject cookies. However, if you select such a setting, you will not be able to use our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access or log on to our Websites. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

**From you:** Information such as your preferred means of communication is collected when you voluntarily provide it. We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Websites.

**By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the Websites (for example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code).

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with

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Personal Information (such as combining your name with your location). If we do, we will treat the combined information as Personal Information as long as it is combined.

### **5. Security**

We maintain appropriate technical and organizational security measures to protect the security of your data against loss, misuse, unauthorized access, disclosure or alteration. Despite this, the security of the transmission of information via the Internet cannot always be guaranteed and you acknowledge this in your access and use of our Websites. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the “*Contact & Comments*” section (section 10) below.

### **6. Transferring your personal information internationally**

Your Personal Information may be stored and processed in any country where we or our Affiliates have facilities or engage third party service providers, and by using the Websites you understand that we will transfer of information to countries outside of your country of residence which may have data protection rules that are different from those of your country. We have established safeguards to protect Personal Information that is transferred to other countries, including appropriate contractual protections in line with the EU Standard Contractual Clauses and other international data privacy requirements.

### **7. Your choices and access**

We have to process the Personal Information set out in sections 1 and 4 in order to provide you with access to Risk Intelligence Central. You do not have to provide personal information requested by Willis Towers Watson. However, such refusal would prevent you from accessing Risk Intelligence Central.

You may choose to discontinue your access to Risk Intelligence Central and ask that we no longer process your Personal Information in accordance with this notice. Please note that if you do discontinue your use of, or refuse access to Risk Intelligence Central we may still have the right or obligation under applicable law to collect, use, transfer or disclose Personal Information (for example in the context of other services including the CRB Services) and we reserve the right to undertake that activity when appropriate.

If you would like to access, review, correct, update, suppress, restrict or object to the processing of your Personal Information or request a copy of Personal Information about you, you may contact us by sending your request by email provided in the “*Contact & Comments*” section (section 10) below.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

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Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

### **8. Retention Period**

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this privacy notice unless a longer retention period is required or permitted by law.

### **9. Changes to our Privacy notice**

From time to time, we may change our privacy notice. The effective date of this privacy notice, as indicated at the beginning of this privacy notice, indicates the last time this privacy notice was revised. Checking this effective date allows you to determine whether there have been changes since the last time you reviewed the notice. We will notify you of changes to this privacy notice by posting the revised privacy notice on our Websites. Your use of the Websites following these changes means that you accept the revised privacy notice.

### **10. Contacts and Comments**

The Websites are controlled by various companies within the Willis Towers Watson Group providing Corporate Risk and Broking Services including the entity with which you have a Relationship Agreement. If you have any questions or comments regarding this privacy notice, please contact our Global Privacy Office, at 800 North Glebe Road, Arlington, VA 22203 or at [privacy@willistowerswatson.com](mailto:privacy@willistowerswatson.com).

### **11. International Supervisory Authorities & Willis Towers Watson entities.**

You have the right to provide a comment or lodge a complaint with a supervisory authority regarding this privacy notice. Details of the supervisory authorities for your region are listed below, but if they are not listed the details may also be available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

	<b>Local Data Protection Regulator</b>	<b>Controller entity (for European Union) or applicable entity collecting the data:</b>
<b>UK</b>	The Information Commissioner's Office, Water Lane, Wycliffe House Wilmslow - Cheshire SK9 5AF Tel. +44 1625 545 745 e-mail: <a href="https://ico.org.uk/concerns/Website">https://ico.org.uk/concerns/Website</a> : <a href="https://ico.org.uk">https://ico.org.uk</a>	Willis Limited 51 Lime Street London EC3M 7DQ
<b>Switzerland</b>	Confederate Data Protection and Publicity Commissioner Feldeggweg 1 3003 Bern Switzerland	Willis AG Talstr. 62 8021 Zurich Switzerland
<b>Singapore</b>	Personal Data Protection Commission 460 Alexandra Road #10-02 PSA Building Singapore 119963	Willis Towers Watson Brokers (Singapore) Pte. Ltd.

## RISK INTELLIGENCE CENTRAL PRIVACY NOTICE

	<p><a href="http://www.pdpc.gov.sg/">http://www.pdpc.gov.sg/</a>  Telephone: +65-6508-7333  Email: <a href="mailto:info@pdpc.gov.sg">info@pdpc.gov.sg</a></p>	
<b>New Zealand</b>	<p>Office of the Privacy Commissioner  PO Box 10094,  Wellington 6143, New Zealand  <a href="https://privacy.org.nz/">https://privacy.org.nz/</a>  Telephone: 0800 803 909  Fax: 04 474 7595  Email: <a href="mailto:enquiries@privacy.org.nz">enquiries@privacy.org.nz</a></p>	<p>Willis New Zealand Limited  Level 8, 21 Queen street, Auckland 1140  New Zealand</p>
<b>Mexico</b>	<p>Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (INAI)  Insurgentes Sur No. 3211 Col. Insurgentes Cuicuilco, Delegación Coyoacán, C.P. 04530  <a href="http://www.inai.org.mx">http://www.inai.org.mx</a></p>	<p>Willis, Agente de Seguros y de Fianzas, S.A. de C.V.  Avenida Santa Fe #495, Piso 10, Colonia Cruz Manca, Delegación Cuajimalpa, C.P. 05349, Ciudad de México, México</p> <p>Carsa Consultores, Agente de Seguros y de Fianzas, S.A. de C.V.  Av. La Paz No. 2661  Col. Arcos Vallarta Sur  C.P. 44130, Guadalajara, Jalisco</p> <p>Towers Watson, Agente de Seguros, S.A. de C.V.  Edificio Quadro Piso 4 Blvd. Manuel Avila Camacho No.76  Col. Lomas de Chapultepec 11000, Ciudad de México.</p>
<b>Hong Kong</b>	<p>Office of the Privacy Commissioner for Personal Data (the “Privacy Commissioner”)  12/F, Sunlight Tower, 248 Queen's Road East  Wanchai  Hong Kong   <a href="http://www.pcpd.org.hk">www.pcpd.org.hk</a></p>	<p>Willis Hong Kong Limited   18/F Lee Garden One, 33 Hysan Avenue, Causeway Bay   Hong Kong</p>
<b>Germany</b>	<p>The Data Protection Commissioner of the Federal State Hesse  Gustav-Stresemann-Ring 1  65189 Wiesbaden  Germany</p>	<p>Willis Towers Watson  Versicherungsmakler GmbH  Solmsstr. 71-75  60486 Frankfurt am Main  Germany</p>
<b>Colombia</b>	<p>Superintendencia de Industria y Comercio  Carrera 13 No. 27 - 00, Pisos. 1 y 3  Contact center: (571) 592 04 00</p>	
<b>Australia</b>	<p>Office of the Australian Information Commissioner  Level 3, 175 Pitt Street  Sydney NSW 2000  Australia  1300 363 992  <a href="https://www.oaic.gov.au/individuals/">https://www.oaic.gov.au/individuals/</a></p>	<p>The Privacy Officer  Willis Towers Watson  Level 16, Angel Place  123 Pitt Street  Sydney NSW 2000 Australia  E-mail: <a href="mailto:Aust_privacy@willis.com">Aust_privacy@willis.com</a>  Telephone: 02 9285 4000</p>
<b>France</b>	<p>Commission Nationale de l’Informatique et des Libertés</p>	<p>Gras Savoye  Immeuble Quai 33</p>

## RISK INTELLIGENCE CENTRAL PRIVACY NOTICE

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<b>Norway</b>	Datatilsynet  The Data Inspectorate  P.O. Box 8177 Dep  0034 Oslo  Tel. +47 22 39 69 00; Fax +47 22 42 23 50  e-mail: <a href="mailto:postkasse@datatilsynet.no">postkasse@datatilsynet.no</a>	Willis Towers Watson AS  Drammensveien 147 A   P.O.Box 344 Skøyen   NO-0213 Oslo   Norway