



Privacy Notice for Job Applicants, Associates, Temps, Contractors and other Workers (South Africa)

April 2019

Please read this Privacy Notice carefully. It describes how Willis Towers Watson handles personal information about You which Willis Towers Watson collects in connection with Your employment or other engagement by Willis Towers Watson in South Africa. It also explains certain legal rights You have in connection with Your personal information which is handled by Willis Towers Watson. This Privacy Notice may be revised from time to time to reflect changes in law or changes in Willis Towers Watson's business operation. This Privacy Notice was last updated on 31 March 2019.

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

This Privacy Notice explains how Willis Towers Watson handles personal information about You. This Privacy Notice will apply to You if You are actually or prospectively employed or otherwise engaged by Willis Towers Watson 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 Towers Watson handles personal information about its workforce in South Africa. This Privacy Notice will apply to You if Willis Towers Watson 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 Towers Watson, or creating a new employment relationship or any other new relationship between You and Willis Towers Watson. Nothing in this Privacy Notice 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 the Willis Towers Watson Group companies located in South Africa will be responsible for ensuring that Your personal

information is handled properly by Willis Towers Watson. The particular company responsible will vary depending Your relationship with Willis Towers Watson and the nature of Your engagement by Willis.

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 the Willis Towers Watson Group is Willis Towers Watson PLC, a company listed on the NASDAQ (Symbol: WLTW) and 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 Towers Watson Group company who is responsible for the handling of Your personal information by Willis Towers Watson in South Africa is:

2.2.1 if You are employed or otherwise engaged by Willis Towers Watson in connection with Willis Towers Watson'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 Towers Watson in connection with Willis Towers Watson's reinsurance business:

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

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 and the

nature of Your relationship with 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, South African ID number, passport number, and driver's license 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 Towers Watson;
- 3.1.7 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, 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 Towers Watson 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 Towers Watson's facilities / premises

and IT systems (e.g. websites visited and emails sent / received using Willis Towers Watson's IT systems) and Your participation in or acceptance of any scheme or benefit arranged by Willis Towers Watson 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 Towers Watson 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 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 ensure that Willis Towers Watson can properly administer the relationship with Willis Towers Watson's workforce, and to ensure that Willis Towers Watson complies with the relevant legal, regulatory, or contractual obligations that are imposed on Willis Towers Watson, 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 ensure that Willis Towers Watson effectively fulfills, manages, develops, and administers all aspects of its actual or prospective relationship with You and Willis Towers Watson'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 Towers Watson complies with all relevant legal obligations that apply to Willis Towers Watson 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 Towers Watson 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 Towers Watson as a regulated business (such as regulatory compliance) or any contractual obligation Willis Towers Watson owes to its clients (such as obligation of confidentiality). Please note that as part of this purpose, Willis Towers Watson 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 Towers Watson 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 Towers Watson has formally engaged You, in any capacity.

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

- 4.2.1 to enable third parties who support Willis Towers Watson'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 Towers Watson may make available to You ;

- 4.2.3 to facilitate Willis Towers Watson's day-to-day business operation in general, including commercial transactions conducted between Willis Towers Watson and third parties such as clients, (re)insurers, other intermediaries, and vendors / suppliers, as well as other arrangements between Willis Towers Watson 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 Towers Watson 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 Towers Watson for all of the aforementioned purposes. Willis Towers Watson 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 Towers Watson may retain Your personal information on its file for record keeping purposes even if Your application is unsuccessful, but Willis Towers Watson 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 Towers Watson, Willis Towers Watson may retain Your personal information on its file for record keeping purposes but Willis Towers Watson 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 Towers Watson'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 Towers Watson's compliance with law concerning equal opportunity and anti-discrimination practices, or to facilitate Your rehabilitation and return to work.

5

How does Willis Towers Watson obtain my Personal Information?

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

- 5.1 Willis Towers Watson typically obtains Your personal information directly from You, but depending on the circumstances, Willis Towers Watson might obtain Your personal information indirectly from third parties that have referred You to Willis Towers Watson (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 Towers Watson 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 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 Notice; 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 employing or otherwise engaging You, or adversely affect Willis Towers Watson'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 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 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 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 employing or engaging You).

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

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

7.1 Willis Towers Watson 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 Towers Watson regarding job opportunities at Willis Towers Watson.

7.2 Additionally, if You are employed or otherwise engaged by Willis Towers Watson, You might from time to time receive communications from Willis Towers Watson regarding products and

services which Willis Towers Watson makes available as part of benefits granted to Willis Towers Watson'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 Towers Watson.

- 7.3 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. 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 only where such disclosure is consistent with the purposes for which Willis Towers Watson obtained Your personal information.

- 8.1 Willis Towers Watson 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 Towers Watson may share Your personal information with the following third parties:
- 8.1.1 those who are involved in supporting Willis Towers Watson'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 Towers Watson 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 Towers Watson may make available to You;

- 8.1.3 counter-parties to commercial transactions conducted by Willis Towers Watson 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 Towers Watson 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 Towers Watson 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 Towers Watson shares Your personal information with such third parties, Willis Towers Watson 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 Towers Watson 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 Towers Watson will not comply with such request without Your prior written approval, 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 , 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 Towers Watson's business operation, 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 South Africa.
- 9.2 Your personal information may be transferred across international borders by Willis Towers Watson to affiliates of the Willis Towers Watson 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 Towers Watson Group companies that are based in the UK, USA, 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 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 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. Will my Personal Information be kept secure by Willis Towers Watson?

Willis Towers Watson 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 Towers Watson Group, including Willis in South Africa.

- 10.1 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 Group's Information Security Policy which applies to all members of the Willis Towers Watson 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 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 the Information Regulator (see Section 13.5 below) and 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 the Information Regulator and You about such incidents.

- 10.4 Please note that Your use of Willis Towers Watson'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 Towers Watson'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 Towers Watson will not be liable for anything that happens as a result of Your personal use of Willis Towers Watson's IT systems.

11. Does Willis Towers Watson monitor me at work?

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

11.1 Willis Towers Watson 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, access to the Internet via Willis Towers Watson's network, emails sent or received using a Willis Towers Watson email account, etc.).

11.2 Willis Towers Watson may make use of such monitoring capability to monitor Your access to Willis Towers Watson's premises, facilities, and IT systems (or Your correspondence with Willis Towers Watson'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 Towers Watson's clients, workforce, and other stakeholders.

11.3 Such monitoring forms part of the information security measures deployed by Willis Towers Watson (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 31 March 2019. Willis Towers Watson 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 31 March 2019. This Privacy Notice 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 employed or otherwise directly engaged by Willis Towers Watson, You will be notified directly about material changes to this Privacy Notice but if You do not have a direct interaction with Willis Towers Watson, it may not be practicable for Willis Towers Watson 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 Towers Watson's website for South Africa at http://www.willis.co.za/willis_sa_policy/

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 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 Towers Watson to:

13.1.1 confirm whether or not Willis Towers Watson handles Your personal information;

13.1.2 grant access to Your personal information held by Willis Towers Watson;

13.1.3 correct, destroy, or delete Your personal information, if Your personal information held by Willis Towers Watson 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 Towers Watson, please contact:

- 13.2.1 if You are employed or otherwise engaged by Willis Towers Watson in connection with Willis Towers Watson'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@willistowerswatson.com

- 13.2.2 If You are employed or otherwise engaged by Willis Towers Watson in connection with Willis Towers Watson's reinsurance business:

Compliance Officer Willis Re (Pty) Ltd
Illovo Edge
No. 1 Harries Road
Illovo
Sandton 2196
South Africa
Tel: +27 11 341 9600
Email: WRecompliance@willistowerswatson.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 Towers Watson 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 Towers Watson 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 Towers Watson's PAIA s51 Manual, which is available from Willis Towers Watson's website at http://www.willis.co.za/willis_sa_policy/, or upon request.

- 13.5 Willis Towers Watson 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 Towers Watson. However, if You are dissatisfied with Willis Towers Watson's response and wish to make a formal complaint about the way in which Willis Towers Watson 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 as set out below.

- 13.6 The Information Regulator (South Africa)
Salu Building
316 Thabo Sehume Street
Pretoria
+27 12 406 4818
Email: infoereg@justice.gov.za

About Willis Towers Watson

Willis Towers Watson (NASDAQ: WLTW) is a leading global advisory, broking and solutions company that helps clients around the world turn risk into a path for growth. With roots dating to 1828, Willis Towers Watson has 45,000 employees serving more than 140 countries and markets. We design and deliver solutions that manage risk, optimize benefits, cultivate talent, and expand the power of capital to protect and strengthen institutions and individuals. Our unique perspective allows us to see the critical intersections between talent, assets and ideas – the dynamic formula that drives business performance. Together, we unlock potential. Learn more at willistowerswatson.com.

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