

PRIVACY POLICY

FOR CLIENTS, INSUREDS, AND CLAIMANTS

Please read this Privacy Policy carefully. It describes how **Willis** handles personal information about **You** which **Willis** collects in connection with the services **Willis** provides. It also explains certain legal rights **You** have in connection with **Your** personal information which is handled by **Willis**. This Privacy Policy may be revised from time to time to reflect changes in law or changes in **Willis's** business operation. This Privacy Policy was last updated on 24 September 2014.

1. WHAT IS THE PURPOSE OF THIS PRIVACY POLICY, AND DOES IT APPLY TO ME?

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

1.1 In many countries around the world (including **Australia** and **New Zealand**), 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 The purpose of this Privacy Policy is to inform **You** how **Willis** handles personal information about **You** which **Willis** obtains in connection with its business activities. This Privacy Policy will apply to **You** if **Willis** in **Australia** or **New Zealand** obtains **Your** personal information in connection with **Willis's** business activities.

1.3 Please note that this Privacy Policy 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 Policy which can be found at:
http://www.willis.com/Client_Solutions/Services/Personal_Insurance/Global_Wealth_Solutions/Privacy

1.4 Nothing in this Privacy Policy alters any existing relationship between **You** and **Willis**, or creates any new relationship between **You** and **Willis**. Nothing in this Privacy Policy 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 Australia or New Zealand 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 location and Your relationship with 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 company within the Willis Group who is responsible for the handling of **Your** personal information in connection with the services provided by **Willis** will vary depending on the nature of the services provided and the country in which the services are provided.

2.3 In **Australia**, the responsible company is:

2.3.1 **Willis Australia Limited**, Level 16, Angel Place, 123 Pitt Street, Sydney NSW2000, **Australia** (in respect of personal information handled in relation to insurance broking and related services provided in **Australia**);

2.3.2 **Willis Reinsurance Australia Limited**, Level 16, Angel Place, 123 Pitt Street, Sydney NSW2000, **Australia** (in respect of personal information handled in relation to reinsurance broking and related services provided in **Australia**); or

2.3.3 **Willis Employee Benefits Limited**, Level 16, Angel Place, 123 Pitt Street, Sydney NSW2000, **Australia** (in respect of personal information handled in relation to pension, medical, and other like employee benefits and related services provided in **Australia**).

2.4 In **New Zealand**, the responsible company is **Willis New Zealand Limited**, Level 8, 21 Queen street, Auckland 1140, **New Zealand** (in respect of personal information handled in relation to all services provided in **New Zealand**).

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, tax file 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 sensitive information such as **Your** racial/ethnic origin, religious/philosophical/political views or affiliations, membership of trade union or professional/trade association, sex life, criminal record, 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 insurance, to handle 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, insurers, reinsurers, 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 services 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 and services 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 **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;
 - 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 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

5.3.2 underwriters, actuaries, insurers, reinsurers, 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** and other like third parties 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 Policy; 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 Please note that due to the nature of services **Willis** provides and the relevant legal and regulatory requirements that govern them, **Willis** is unlikely to be able to deal with **You** if **You** refuse to properly identify **Yourself** or if **You** insist on using pseudonym in dealing with **Willis**.

6.4 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).

- 6.5 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 or current client of **Willis** (or a prospective client referred to **Willis** by a third party), or if **You** are a **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 also comply with any applicable law that specifically regulates the use of **Your** personal information for direct marketing purposes, including any applicable rules concerning the use of a 'Do-Not-Call' registry or similar facility.
- 7.4 **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 insurance, to handle 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, insurers, reinsurers, 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 services 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 Australia or New Zealand 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 **Your** country.
- 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 U.K., U.S.A., 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 supports **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. HOW WILL MY PERSONAL INFORMATION BE KEPT BY WILLIS?

Willis will keep most of Your personal information in electronic form (typically on IT systems maintained by other Willis Group companies), although some of Your personal information could be kept in paper form. Willis will keep Your personal information for as long as there is a need for Willis to keep Your personal information for one or more of the purposes Your personal information was originally collected. Your personal information will be handled by Willis securely at all times.

- 10.1 Most of the personal information **Willis** collects will be entered into and held by the relevant parts of the IT systems used by **Willis** (such as client relationship management system, email system, broking system, or accounting system). Such IT systems are typically operated and supported by affiliates of **Willis** that are located in the U.K., U.S.A., and India,

but certain specialist IT systems are maintained by third party service providers.

- 10.2 Some personal information **Willis** collects will be kept in paper form (e.g. where **Your** personal information is included in forms, letters, or files and notes kept by **Willis's** brokers and advisors, etc.). However, depending on the circumstances, **Willis** might destroy the paper copies after they have been scanned into **Willis's** IT systems. Personal information held in paper form will ordinarily be kept on **Willis's** premises until it is moved to document archives operated third party service providers.
- 10.3 Whether it exists in electronic form or paper form, **Your** personal information will be retained by **Willis** for as long as they are required for one or more of the purposes specified in Section 4. Please note that for legal and regulatory reasons, **Willis** will often need to retain **Your** personal information even after **Willis** stops performing the relevant services which requires **Willis** to handle **Your** personal information.
- 10.4 In particular, please note that due to the way in which (re)insurance works, **Willis** may need to retain **Your** personal information for long periods. For example, if **Willis** arranges an insurance which provides cover for *incidents that take place during the term of the policy* as opposed to cover for *claims that are made during the term of the policy*, then **Willis** may need to keep the relevant records (including personal information) for many years even after the policy is terminated, because a valid claim can potentially be made many years after such a policy has expired.
- 10.5 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.
- 10.6 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.
- 10.7 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 **You** (and/or the relevant client of **Willis**, where applicable) in accordance with any applicable law which requires **Willis** to notify **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 If **You** telephone **Willis** in **Australia**, **Your** telephone conversation with **Willis's** brokers and advisors may be recorded for training, quality monitoring, and regulatory compliance purposes. Where this is the case, **You** will be given a separate notice about such recording when **You** telephone **Willis**.
- 11.2 If **You** personally visit any of **Willis's** office in **Australia**, **Your** access to and use of **Willis's** premises and facilities may, depending on the location of the **Willis** office, be subject to monitoring via CCTV systems for safety and security reasons.
- 11.3 **Willis** also 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 additional 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).

11.4 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).

12. WILL THIS PRIVACY POLICY CHANGE IN THE FUTURE?

This Privacy Policy was last updated on 24 September 2014. Willis may need to revise this Privacy Policy from time to time to reflect changes in law or changes in its business operation.

12.1 This Privacy Policy was last updated on 24 September 2014. This Privacy Policy 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 changes to this Privacy Policy 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 Policy, although **Willis** will notify its corporate clients about any changes to this Privacy Policy.

12.3 As a minimum, changes to this Privacy Policy will be publicised on:

12.3.1 **Willis's** website for **Australia** at <http://www.willis.com.au/>; and

12.3.2 **Willis's** website for **New Zealand** at <http://www.willisgroup.co.nz/>,

in both cases through a link to 'Privacy Policy' that appears at the bottom frame of the landing page.

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 **Australia's** Privacy 1988 or **New Zealand's** Privacy Act 1993, **You** have the legal right to access **Your** personal information held by **Willis** and to ask **Willis** to correct or delete **Your** personal information (e.g. where it is inaccurate or out-of-date). If **You** would like to exercise this right, or if **You** have any query or complaint regarding the way in which **Your** personal information is handled by **Willis**, please contact:

13.1.1 if **You** live in **Australia**:

Privacy Officer
Willis Australia Limited
Level 16, Angel Place, 123 Pitt Street
Sydney NSW 2000
Australia
Telephone: (02) 9285 4068
Email: aust_privacy@willis.com

13.1.2 if **You** live in **New Zealand**:

Privacy Officer
Willis New Zealand Limited
Level 8, 21 Queen street
Auckland 1140
New Zealand
Telephone: (0508) 945 547
Email: aust_privacy@willis.com

13.2 **You** can also write to the Willis Group's central compliance department at:

Chief Compliance Officer – International
The Willis Building
51 Lime Street
London EC3M 7DQ
United Kingdom
Email: group.compliance@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 **Willis** will endeavour to respond satisfactorily to **Your** request to access or correct/delete **Your** personal information, or any question or concern **You** may have regarding **Your** personal information. If **You** are dissatisfied with **Willis's** response, **You** can complain to **Willis** (please see Section 13.1), and **Your** complaint will be addressed in accordance with **Willis's** Complaints Handling Procedure, a summary of which is available upon request.

13.5 If **Your** complaint cannot be resolved satisfactorily through **Willis's** Complaints Handling Procedure, or if **You** wish to learn more about **Your** rights under **Australia's** Privacy Act 1988 or **New Zealand's** Privacy Act 1993, **You** can contact:

13.5.1 if **You** live in **Australia**:

Office of the Australian Information Commissioner
Level 3, 175 Pitt Street
Sydney 2000
Australia
<http://www.oaic.gov.au/>
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

13.5.2 if **You** live in **New Zealand**:

The Privacy Commissioner's Office
Level 4, 109-111 Featherston Street
Wellington 6143
New Zealand
<http://privacy.org.nz/>
Telephone: 0800 803 909

Willis Australia Limited

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123 Pitt Street
Sydney NSW 2000
Australia

www.willis.com.au

Willis Australia Limited
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