

## 1. Scope of this Privacy Notice

This Privacy Notice (“**Notice**”) describes, generally, how Willis Towers Watson, in its capacity as “controller” , collects and processes personal information in the course of offering or administering our Affinity Insurance Web Portal (“**Website**”), associated Affinity UK products and services (“**Services**”) and other websites that link to this Notice (collectively, the “**Website(s)**”), in accordance with the UK General Data Protection Regulation and the UK Data Protection Act 2018 (“**Data Protection Laws**”).

Willis Towers Watson operates worldwide through subsidiary and affiliate companies. Where we say “**we**,” “**us**,” or “**our**” in this Notice we mean the Willis Towers Watson entity that processes your data in connection with the Services.

We work closely with a variety of Insurers to deliver the Affinity service. Insurance involves the use and disclosure of Personal Information by various insurance market participants such as intermediaries, insurers and reinsurers. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice, which you can find further information on here: <https://img.london/wp-content/uploads/2024/05/Lloyds-Core-Uses-Notice-Document-28-05-24.pdf>. However, you should read this Notice for specific information regarding how we process Personal Information in relation to the Services.

In providing the Website and Services, we may be required to process Personal Information relating to:

- former, current, and prospective Affinity clients and their employees or representatives that use our Affinity Website, (“users”), including information related to, or which we may receive from, our points of contact at our commercial entity clients;
- individuals who communicate with us through the Affinity Websites;
- individuals who use our Affinity Services, either for themselves or on behalf of an organization or entity; and
- individuals whose personal information we receive in providing the Services, for example third-party individuals such as an individual named in an insurance policy, that are beneficiaries of, or have made claims under, an insurance policy, or who are involved in an incident giving rise to an insurance claim.

## WTW Affinity UK Privacy Notice

This Notice applies to any individual whose Personal Information we process in the course of offering or administering our Websites and Services (“**you**”).

Our collection, use and disclosure and processing of personal information about individuals will vary depending upon the circumstances. This Notice is intended to describe our privacy and data protection practices in respect of the Websites and Services. In some cases, different or additional notices about our data collection and processing practices may be provided and apply to our processing of certain personal information.

**Not covered by this Notice.** This Notice does not apply to any non-Affinity WTW products, services, or websites or to third party websites, services, products, or mobile applications maintained by other companies which are linked to or from our Services or Websites. This Notice also does not apply to job applicants and candidates who apply for employment with us through our job application portal or to our employees and non-employee workers whose personal information is subject to different privacy notices which are provided to such individuals in the context of their employment or working relationship with a Willis Towers Watson group entity.

**Other websites.** Where links from the Website are provided to third party websites, including websites for processing of credit card payments, we are not responsible for those websites. The inclusion of a link to a third-party website, including websites for processing of credit card payments, does not imply endorsement of the linked site or service by us or our affiliates. We are not responsible for how your Personal Information is handled by such third-party websites. Please review the privacy notice of any third party and their website to understand how your Personal Information is handled by them.

## 2. Personal Information we may collect

**"Personal Information"** is information that identifies you as an individual or relates to an identifiable individual.

The personal information that we collect and process will vary depending upon the circumstances, like the type of Services we are providing and the relationship between us, or between you and our client, but may include:

- your full name, postal address, email address, phone number, occupation and other contact information;
- your age, gender and date of birth;
- your country of birth and country of residence;
- log in information such as a username and password;

## WTW Affinity UK Privacy Notice

- copies of your identification documents;
- payment information such as credit card or bank details;
- information required by our partner insurance providers to provide a quote (such as your employment details, salary, family details, assets, motor vehicle history or medical history);
- transactional information, such as details of your insurance policy;
- information about any claims you make on your insurance policy;
- any interest you have in relation to our services or our practice areas;
- any information you may voluntarily submit to us by completing any form on our Website; and
- details of your visits to and usage of our Website.

Some categories of personal information we collect are known as special categories of personal data, or "Sensitive Personal Information". This may include information that relates to your health such as your medical history or current medical status if you are making a claim that requires this information. You may also be asked to provide information about criminal records. The law imposes special requirements on us when we collect this type of information, and we will ask for your consent to process this information where required by applicable law.

### 3. How we may collect your Personal Information

We may collect your Personal Information in the following ways:

- directly from you, when you submit your details to register or request a quote, purchase a policy or register a claim, if you are our client, acting on behalf of our client or if you are involved in a claim that we are handling for a client;
- from a third party acting on your behalf. When such a third party provides us with Personal Information about you, we ask that third party to provide a copy of this Notice to you before doing so;
- from any form you may complete and submit through our Websites, for example information collected from the "Contact Us" page of our Websites;
- from the content of surveys that you may complete on our Websites;
- from '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 8 below);
- from publicly available sources such as information available about claims and convictions on public records;
- in some circumstances, we collect information about you in conjunction with our partners or other companies that we work with to provide you our Services, or they provide us with your information consistent with your direction to do so.

## WTW Affinity UK Privacy Notice

We collect personal information directly from individuals and automatically related to the use of the Services and Websites. Generally, we collect your personal information on a voluntary basis. However, if you decline to provide certain personal information that is marked mandatory, you may not be able to access certain services, or we may be unable to fully respond to your inquiry. Where you provide personal information to us, it is important that all such information should be accurate and updated.

### 4. How we may use your Personal Information

We use Personal Information about you for our legitimate business interests or for the execution and management of your insurance contract. This may include using your Personal Information:

- to operate and maintain the Website (including to investigate suspicious behaviour) and provide our Services;
- to operate and expand our business activities;
- to manage, run, and administer your account(s) with the Website;
- to perform administrative activities in connection with our Services such as correspond with you, notify you of events or changes to our service, or otherwise to fulfil your requests and respond to your queries and requests for information;
- to carry out background checks and conduct due diligence;
- to ensure you are eligible for the products you apply for through the Website;
- to conduct analysis that allows us to assess risk, price our products, develop new products, and enhance, improve or modify the Website and our Services;
- for fraud monitoring, detection and prevention purposes;
- to facilitate your participation in interactive features you may choose to use on our Websites and personalize your experience on the Website by presenting content tailored to you;
- to carry out marketing activities (subject to compliance with applicable laws);
- to exercise, defend or protect our legal rights or the rights of our clients or third parties; and
- to comply with legal and professional obligations and to cooperate with regulatory bodies.

**Aggregate and de-identified information.** We may de-identify personal information and create anonymous and aggregated data sets and reports to assess, improve, and develop our business, products, and services, prepare benchmarking reports on our industry, and for other research, marketing and analytics purposes. When we de-identify personal information, we have implemented reasonable measures as

## WTW Affinity UK Privacy Notice

required by law to ensure that the de-identified data cannot be associated with any individual or client. We will only maintain and use such data in a de-identified manner and do not attempt to re-identify the data, except as permitted by law.

### 5. Legal bases for processing Personal Information

We must have a legal basis to process your Personal Information in accordance with the Data Protection Laws. In most cases the legal basis will be one of the following:

- where it is necessary to enter into your contract / for the performance of your contract and our Services;
- where it is necessary for our legitimate interests, for example to provide and improve our services, manage our risks, maintain accurate transaction records, and manage our business in an efficient way. These circumstances shall only apply where such legitimate interests are not overridden by your interests or fundamental rights and freedoms;
- where it is necessary for the legitimate interests of third party product providers (for example, to investigate and assess claims made against policies held or underwritten by them and to prevent and detect suspicions of fraud). These circumstances shall only apply where such legitimate interests are not overridden by your interests or fundamental rights and freedoms;
- where it is necessary to comply with our legal obligations such as due diligence and reporting obligations, for example know-your-customer checks to prevent money laundering and fraudulent activities; or
- where you have provided your consent, when it is required by applicable law. You may withdraw your consent at any time by contacting us using the details at the end of this Notice.

We process Sensitive Personal Information only when one of the following applies:

- when we have your explicit consent (in which case you may withdraw your consent at any time by contacting us using the details at the end of this Notice);
- to establish, exercise or defend legal claims; or
- where legislation otherwise permits us to process Sensitive Personal Information (for example, under the Data Protection Laws where the processing is necessary for insurance purposes, i.e. for advising, arranging, underwriting or administering an insurance contract or handling claims).

## 6. Disclosure of your Personal Information

We may disclose your Personal Information to the following categories of third parties:

- to any Willis Towers Watson company for the uses and purposes set out above, including without limitation for conducting “Know Your Customer” (KYC) checks such as screening against sanctions lists and for so-called “politically exposed persons,” and marketing the products and services offered by other businesses across the Willis Towers Watson group (subject to applicable laws);
- to our affiliates who support our business operations (who may be located in other jurisdictions);
- to companies involved in the provision of professional services and the sale of insurance products through the Website, including insurance providers and companies that provide reinsurance, loss adjusting, broking and claims handling services;
- to third party service providers such as entities providing customer service, email delivery, cloud computing, auditing, hosting our website and payment service providers;
- to third parties involved with any events that you register for, to facilitate your participation in those events;
- to third parties with whom you have an affinity relationship and who collaborate with Willis Towers Watson in the distribution of products and/or services;
- to courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence;
- to other third parties to whom we may be obliged to disclose your Personal Information under applicable law or regulation, which may include laws outside your country of residence;
- in connection with the planning, due diligence and implementation of commercial transactions, including in the event of any reorganization, merger, amalgamation, 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). In such cases, your personal information may be shared with the acquiring or successor entity along with its affiliates and subsidiaries;
- to our professional advisers; and
- in accordance with the separate terms and conditions of use that may apply to you or with your explicit consent.

We request our external service providers to implement and apply security safeguards to ensure the privacy and security of your personal information. These

## WTW Affinity UK Privacy Notice

third parties have agreed to confidentiality restrictions and to use of any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us.

### 7. Cross-border transfer

Willis Towers Watson is a global organisation operating in more than 140 countries and our business activities are global in nature. As such your Personal Information may be transferred to and processed in any country where the Willis Towers Watson group maintains facilities or in which it engages service providers, and by using the Website you acknowledge that your Personal Information may be transferred to, and processed in, countries outside of your country of residence, which may have data protection laws that are not equivalent to those of your country. However, we always take steps to ensure any transfer of Personal Information is carefully managed to protect your privacy rights. In particular:

- For transfers between Willis Towers Watson Group companies: We have put in place a global intercompany data transfer agreement that provides the most up to data transfer protection available under all relevant global privacy legislation, including the European Commission-approved Standard Contractual Clauses and the UK ICO-approved UK International Data Transfer Addendum, to ensure that transfers of Personal Information within the WTW group of companies receives a consistent and adequate level of protection wherever it is transferred; and
- For transfers to third parties outside of the Willis Towers Watson Group of Companies: Where we are legally required to do so, transfers of Personal Information to parties located in countries outside the UK/EU/EEA will be made pursuant to the European Commission-approved Standard Contractual Clauses and the UK ICO-approved UK International Data Transfer Addendum or other legally acceptable mechanisms that ensure an adequate level of protection. Some recipients located outside of the UK/EEA are located in countries for which the UK government/European Commission (respectively) has issued adequacy decisions. Where other national regulators have issued Standard Contractual Clauses to ensure transfers of Personal Information to parties located outside the country of origin complies with the applicable national data protection law, we will make such transfers pursuant to those Standard Contractual Clauses also.

Please see the Contact & Comments section below for details on how you can contact us to get further information on the third countries to which Personal Information will be transferred and further information relating to the safeguards we have in place in relation to international transfers of data.

### 8. Cookies

We use cookies and other technologies on this Website. You can find out more about the cookies we use and why by viewing our [Cookie Notice](#). Our Cookie Notice should be read together with this Notice.

### 9. 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 Website. 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 below.

### 10. Retention

WTW stores personal information for as long as is necessary to accomplish the purposes identified in this Notice and to meet legal requirements, including legal and compliance requirements regarding records retention, resolving disputes, and enforcing our agreements. This means that WTW may be required to maintain your information, for example, to: (1) comply with our legal or regulatory compliance needs (e.g., maintaining records of transactions you have made with us); (2) to exercise, establish or defend legal claims; and/or (3) to protect against fraudulent or abusive activity on our services and systems. For these and possibly other reasons, we may be unable to delete personal information upon request of an individual in certain cases. We will delete your Personal Information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data. We may retain aggregated or anonymised data (which is not treated as Personal Information under this Notice) for longer.

We may retain different categories of information for different periods of time for the instances stated above. However, it is our policy as an organization that when personal information is no longer needed or after legal authority to retain it has expired, personal information will be destroyed in accordance with applicable law

## WTW Affinity UK Privacy Notice

and pursuant to procedures established in relation to the relevant WTW services, systems, or processes. Retention periods for records maintained by WTW, including those containing personal data are established based upon business need, statutory and regulatory record keeping requirements in the geographies where we do business, and legal obligations. If you have any further questions about our handling of personal information, please contact us at [privacy@wtwco.com](mailto:privacy@wtwco.com).

### 11. Choices and access

To exercise any of your rights, which are set out below, you may contact us by sending us an email at [dataaccessrequest@wtwco.com](mailto:dataaccessrequest@wtwco.com) or sending your request by postal mail to the address provided in the “Contact & Comments” section below.

**Right to rectify and complete Personal Information:** you can request the rectification of inaccurate data and the completion of incomplete data. We will inform relevant third parties to whom we have transferred your data about the rectification and completion if we are legally obliged to do so.

**Right to erasure (right to be forgotten):** You have the right to obtain from us the erasure of Personal Information concerning you in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object; or
- it has been processed unlawfully; or
- the data has to be erased in order to comply with a legal obligation to which Willis Towers Watson is subject.

We are not required to comply with your request to erase Personal Information if the processing of your Personal Information is necessary for:

- compliance with a legal obligation; or
- the establishment, exercise or defence of legal claims.

**Right to restriction of processing:** You have the right to obtain from us restriction of processing your Personal Information. In this case, the respective data will be marked and only be processed by us for certain purposes. This right can only be exercised where:

- the accuracy of your Personal Information is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want the Personal Information erased; or

## WTW Affinity UK Privacy Notice

- it is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your Personal Information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

**Right to data portability:** You have the right to receive the Personal Information concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to another entity without hindrance from us, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

**Right to object:** You have the right to object at any time to any processing of your Personal Information which has our legitimate interests as its legal basis. You may exercise this right without incurring any costs.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

The right to object does not exist, in particular, if the processing of your Personal Information is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

**Right to object to how we use your Personal Information for direct marketing purposes:** You can request that we change the manner in which we contact you for marketing purposes. You can request that we not transfer your Personal Information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

**Right to withdraw consent:** if you have given us your consent for the processing of your Personal Information, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

**Right to obtain a copy of Personal Information safeguards for transfers outside your jurisdiction:** You can ask to obtain a copy of, or reference to, the safeguards under which your Personal Information is transferred outside the EU/EEA. We may redact data transfer agreements to protect commercial terms.

## WTW Affinity UK Privacy Notice

**Right to lodge a complaint with your local supervisory authority:** You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your Personal Information.

We ask that you please attempt to resolve any issue with us first, although you have a right to contact your supervisory authority at any time.

Please note that the aforementioned rights might be limited under the applicable national data protection law. We may ask you for additional information to confirm your identity and for security purposes, before disclosing the Personal Information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request. **We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.**

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the regulator in your jurisdiction. For example:

Information Commissioner's Office, at [www.ico.org.uk/concerns/](http://www.ico.org.uk/concerns/).

**Marketing.** You may opt-out from receiving marketing-related communications from us on a going-forward basis by contacting us or by using the unsubscribe mechanism contained in each email. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

## 12. Use of Websites by minors

The Website is not directed to individuals under the age of twelve, and we request that minors do not provide Personal Information through the Websites.

## 13. Changes to our Notice

From time to time, we may change our Notice. The effective date of this Notice, as indicated at the beginning of this Notice, indicates the last time this Notice was revised. Checking this effective date allows you to determine whether there have

## **WTW Affinity UK Privacy Notice**

been changes since the last time you reviewed the Notice. Where changes to this Notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will post a notice about this on our Website for a reasonable period of time so that you have the opportunity to exercise your rights (e.g. to object to the processing).

### **14. Contact & comments**

If you have any questions or comments regarding this Notice, please contact our Global Privacy Office at The Willis Building, 51 Lime St, London EC3M 7DQ or at [privacy@wtwco.com](mailto:privacy@wtwco.com).