WILLIS RE CUSTOMER PRIVACY NOTICE

1. Introduction

The purpose of this Customer Privacy Notice ("Notice") is to explain how Willis Re Holdings Limited and its affiliated entities ("Willis Re", "we", "us" or "our") collect, use, share, transfer and otherwise process personal information relating to our customers, prospective customers, insurers, reinsurers, brokers, service providers and individuals connected with our business relationships.

Willis Re values the trust placed in us and is committed to protecting personal information in accordance with applicable data protection laws, including the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 and other applicable privacy laws.

This Notice applies to personal information collected in connection with the provision of our services, our business relationships, communications with customers and counterparties, and the use of our websites, systems and platforms. This Notice does not apply to employee, contractor or applicant data, which is governed by separate privacy notices.

The Willis Re entity with which you, your employer or organisation has a business relationship is the controller of your personal information for the purposes described in this Notice. Where necessary, your personal information may be shared with Willis Re Holdings Limited and its affiliated entities for the purposes described in this Notice, including to provide services, support business operations, comply with legal and regulatory obligations, and manage risk.

2. What Personal Information Do We Collect?

Depending on the nature of our relationship with you, we may collect the following categories of personal information:

Identity Data

- Name
- Title
- Employer
- Job title
- Professional credentials

Contact Data

- Business address
- Email address
- Telephone numbers
- Correspondence details

Customer Relationship Data

- Records of communications

- Meeting notes
- Instructions received
- Customer preferences

Insurance and Reinsurance Data

- Information relating to insurance or reinsurance placements, renewals and claims
- Information provided during broking and advisory engagements

Financial and Transaction Data

- Billing information
- Payment information
- Transaction records

Compliance and Due Diligence Data

- KYC information
- Identity verification information
- AML checks
- Sanctions screening results
- Regulatory due diligence information

Technical and Usage Data

- IP address
- System access information
- Device information
- Website and portal usage information
- Security logs

Marketing and Communications Data

- Marketing preferences
- Event attendance information
- Subscription information

We may also create aggregated or anonymised information which does not identify any individual and may be used for analytics, benchmarking and business improvement purposes.

Special Categories of Personal Data

Where necessary and permitted by law, we may process special category personal data, including health information, criminal convictions data, or other sensitive information required for insurance, reinsurance, claims handling, fraud prevention, sanctions screening, regulatory compliance or legal obligations. Such processing will only occur where an appropriate legal basis applies.

3. Sources of Personal Information

We may collect personal information from:

- You directly;
- Your employer or organisation;
- Insurers, reinsurers, cedants, retrocessionaires and brokers;
- Clients and prospective clients;
- Third-party service providers;
- Professional advisers and service providers;
- Public registers and publicly available sources;
- Due diligence, AML and sanctions screening processes;
- Our websites, systems and communications platforms.

4. Legal Bases and Purposes for Processing

We process personal information only where we have a valid legal basis.

Contractual Necessity

We may process personal information where necessary to:

- Provide reinsurance broking advisory and consulting services;
- Administer insurance and reinsurance placements;
- Facilitate claims handling;
- Manage customer engagements and contractual relationships.

Legal and Regulatory Obligations

We may process personal information where necessary to:

- Comply with AML requirements;
- Conduct sanctions screening;
- Meet regulatory obligations;
- Verify identity;
- Respond to legal, governmental or regulatory requests;
- Maintain required records and audit trails.

Legitimate Interests

We may process personal information where necessary for our legitimate interests, including:

- Managing client relationships;
- Delivering and improving services;
- Business administration;
- Information security;
- Fraud prevention;

- Risk management;
- Claims management;
- Service improvement;
- Corporate governance;
- Defending, establishing or pursuing legal claims;
- Business analytics;
- Network and system security;
- Corporate transactions and business restructuring.

Consent

Where required by law, we will obtain your consent before using personal information for specific purposes. You may withdraw your consent at any time.

5. How We Use Personal Information

We may use personal information to:

- Provide and manage our services;
- Administer client relationships;
- Conduct onboarding and due diligence;
- Verify identities;
- Fulfil regulatory obligations;
- Manage claims and disputes;
- Process invoices and payments;
- Maintain internal records;
- Improve our services;
- Protect our networks and systems;
- Send business-related communications;
- Conduct market analysis and business planning;
- Defend, establish or pursue legal claims.

6. Fraud Prevention, Sanctions and Regulatory Screening

We may process personal information to:

- Verify identity;
- Conduct anti-money laundering checks;
- Perform sanctions screening;
- Detect and prevent fraud and financial crime;
- Assess regulatory compliance risks;
- Investigate suspicious activities;
- Meet legal and regulatory requirements.

Where required, information may be shared with regulators, law enforcement agencies and competent authorities.

7. Sharing Personal Information

Willis Re may share personal information with:

- Other Willis Re group companies;
- Insurers, reinsurers and intermediaries;
- Customers and counterparties;
- Professional advisers, including lawyers, auditors and accountants;
- Technology service providers;
- Cloud hosting providers;
- Compliance and screening providers;
- Regulators and governmental authorities;
- Courts and law enforcement agencies;
- Parties involved in a merger, acquisition or corporate transaction.

All recipients are required to maintain appropriate confidentiality and security measures and may only process personal information for authorised purposes.

8. International Transfers

Willis Re operates internationally and may transfer personal information to countries outside the United Kingdom.

Where information is transferred to jurisdictions that do not provide an equivalent level of data protection, Willis Re implements appropriate safeguards, including:

- International Data Transfer Agreements;
- The UK International Data Transfer Addendum;
- Standard Contractual Clauses; or
- Other legally recognised transfer mechanisms.

Copies of relevant transfer safeguards may be requested by contacting us.

9. Security

Willis Re maintains appropriate organisational, technical and administrative safeguards designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Access to personal information is limited to personnel and third parties with a legitimate business need to know.

10. Retention

We retain personal information only for as long as necessary to fulfil the purposes described in this Notice, including compliance with legal, regulatory, tax, accounting, contractual and recordkeeping requirements.

We may retain personal information for longer periods where necessary to establish, exercise or defend legal claims, address complaints, respond to regulatory inquiries or meet legal obligations.

Where personal information is no longer required, it will be securely deleted, anonymised or destroyed.

11. Your Rights

Subject to applicable law, you may have the right to:

- Request access to personal information;
- Request correction of inaccurate personal information;
- Request deletion of personal information;
- Request restriction of processing;
- Object to processing;
- Request portability of personal information;
- Withdraw consent where processing is based on consent;
- Object to direct marketing communications; and
- Lodge a complaint with a supervisory authority.

12. Contact Details

If you have questions about this Notice, would like to exercise your rights, or wish to raise a privacy concern, please contact:

Email: privacy@willisre.com
Data Access Requests: dataaccessrequest@willisre.com or **United Kingdom Privacy Officer**
Willis Re
Floor 20, The Willis Building
51 Lime Street
London EC3M 7DQ

13. Complaints

If you have concerns regarding our use of personal information, we encourage you to contact us first so that we can seek to resolve your concerns.

You also have the right to lodge a complaint with the Information Commissioner's Office or another competent data protection authority.

14. Changes to this Notice

We may update this Notice from time to time. Where changes materially affect how personal information is processed, we will provide appropriate notice in accordance with applicable law.

ANNEX 1

Categories of Personal Information Collected and Shared Categories of Personal Information

Willis Re may collect the following categories of personal information in connection with customer and business relationships:

- Name and business contact details;
- Professional and employment information;
- Insurance and reinsurance placement information;
- Claims information;
- Billing and payment information;
- Compliance and due diligence information;
- AML and sanctions screening information;
- Correspondence and communications;
- Website and system usage information;
- Marketing preferences;
- Information required to fulfil legal and regulatory obligations.

Purposes for Processing

We may collect, use, disclose and otherwise process personal information for the following purposes:

Client and Relationship Management

- Managing customer relationships;
- Maintaining business records;
- Communicating with customers and counterparties;
- Providing customer support.

Insurance and Reinsurance Services

- Facilitating placements and renewals;
- Supporting underwriting activity;
- Managing claims and disputes;
- Delivering consultancy and advisory services.

Compliance and Regulatory Purposes

- AML compliance;
- Sanctions screening;
- Fraud prevention;
- Regulatory reporting;
- Investigations and legal proceedings.

Business Operations

- Operating and maintaining technology systems;
- Information security;
- Financial management;
- Internal reporting and governance;
- Business planning and analytics.

Marketing and Business Development

- Providing information about our services;
- Event management;
- Relationship development;
- Market research and analysis.

Categories of Third Parties with Whom We May Share Personal Information

Group Companies

Other Willis Re and WTW entities providing operational, administrative, compliance, legal, finance, technology and customer support functions.

Insurance Market Participants

- Insurers;
- Reinsurers;
- Retrocessionaires;
- Brokers;
- Intermediaries;
- Claims administrators;
- Loss adjusters;
- Experts and consultants.

Professional Advisers

- Lawyers;
- Auditors;
- Accountants;
- Tax advisers;
- Insurers.

Service Providers

- Cloud hosting providers;
- Technology vendors;
- Customer relationship management providers;
- Compliance screening providers;
- Due diligence providers;
- Data analytics providers;
- Document management providers.

Regulatory and Governmental Authorities

- Financial regulators;
- Courts and tribunals;
- Law enforcement agencies;
- Supervisory authorities;
- Government departments and agencies.

Corporate Transactions

Parties involved in mergers, acquisitions, reorganisations, joint ventures, financing transactions or business transfers.

Anonymised and Aggregated Information

To the extent permitted by law, Willis Re may anonymise or aggregate information so that it no longer identifies any individual. Such information may be used for benchmarking, analytics, service improvement, product development and business reporting purposes. We will not attempt to re-identify anonymised information except where permitted by law.

International Transfers

The categories of recipients identified in this Annex may be located outside the United Kingdom. Where this occurs, Willis Re will implement appropriate safeguards in accordance with Section 8 of this Notice.

Security and Confidentiality

All recipients of personal information must maintain appropriate technical and organisational measures designed to protect personal information and are only permitted to use such information for authorised purposes.