

WEBSITE PRIVACY STATEMENT

Effective date: December 1, 2019

Marsh Sponsored Programs, a division of Marsh USA Inc. (“**We**”) strive to protect the privacy and the confidentiality of personal information that we process, including that of visitors to this website (the “**Site**”). This Privacy Statement explains what personal information we collect through this Site, how we use, share, and protect that personal information, and what your rights are with respect to your personal information that we gather.

The Privacy Statement is subject to change at any time. If we make changes to this Privacy Statement, we will update the “Effective date” at the top of this page. Any changes we make to this Privacy Statement become effective immediately, so you should review this Privacy Statement regularly for changes.

The Privacy Statement is incorporated into our Website Terms and Conditions of Use. By using this Site, you acknowledge that you have read, understand and accept the Terms of Use, including this Privacy Statement. Please take a moment to familiarize yourself with our privacy practices. If you have any questions, contact us at PrivacyPolicyInquiries@marsh.com.

Scope of this Privacy Statement

Except with respect to the California Resident Privacy Terms below, this Privacy Notice applies solely to data collected via the Site. We gather this information when you:

- Visit or use our websites
- Provide us with the information required to fulfill the services
- Send messages to us
- View or click on ads or other online content
- Create an account

Please note that this Privacy Notice does **not** apply to:

- **Information we collect through other sources:** Except with respect to the California Resident Privacy Terms below, this Privacy Notice does not apply to information we may collect about you through other means (for example by phone or in the context of a direct client relationship), although such information may be covered by separate privacy policies.
- **Third party websites:** This Site includes links or may redirect you to other websites operated by third party organizations. If you access another organization’s website, the other organization may collect information from you. We are not responsible for the content or privacy practices of linked websites or their use. After you leave our Site (you can tell where you are by checking the URL in the location bar on your browser), you should refer to those websites' privacy policies, terms of use, and practices to determine how they will handle any information they collect from you.
- **Company Career Candidates:** You can search for and review postings about job opportunities on Marsh.com. To apply for a position, you must navigate to and sign into a separate global

recruitment website. Our Careers Page and recruitment website are not covered by this Privacy Statement, so please review the privacy statement specific to those websites.

- **Children:** This Site is not intended for children, and we do not knowingly collect, use, or disclose information of children under the age of thirteen (13) without the consent of their parents or legal guardians. In an instance where such information was collected, it would be purely accidental and unintentional, and we will promptly remedy upon notification.

What Data Do We Collect?

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

The personal information we collect through the Site falls into two categories:

- (1) Information you voluntarily provide to us on the Site.
- (2) Information gathered via automated means as you navigate through the Site.

Information Provided by You or Those You Authorize

We collect and process the following personal information:

Individual details ► name, address (and proof of address), other contact details (e.g. email and telephone details), military status, veterinary staff or student status, first responder status, employee ID, photographs, and insured or claimant status.

Identification details ► identification numbers issued by government bodies or agencies (e.g. social security).

Financial information ► payment card number, bank account number and account details, and other financial information.

Insured risk ► information about the insured risk.

Policy information ► information about the quotes individuals receive and the policies they obtain.

Previous claims ► information about previous claims, which may include health data and other Special Categories of personal information (as described in the Insured Risk definition above).

Current claims ► information about current claims, which may include health data, and other Special Categories of personal information (as described in the Insured Risk definition above).

Marketing data ► whether or not the individual has consented to receive marketing from us and/or from third parties.

Information Collected by Automated Means

We use various tools to enhance your user experience and track users of the Site, including cookies. These tools may collect personal information including your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

Cookies are small pieces of text that a website places on your computer to help remember information about your visit. Cookies cannot read data off your computer's hard drive or collect your personal information. We use information collected from cookies to improve your experience and the overall quality of our services. We may also use cookies to collect information from third parties (such as Google) to help advertise our products and services, to analyze the effectiveness of our marketing or the performance of this Site, and to determine whether you may be interested in other products or services. Our cookies may also come from third-party service providers who have permission to place such tools on our Site.

You can refuse to accept and delete cookies by adjusting your browser setting. Please note that refusing or deleting cookies may impact your browsing experience on the Site, or prevent you from using some of its services, and it may result in the deletion of any preferences you have set. For more information on how to reject or delete cookies, you should consult with your browser's or device's help documentation or visit www.aboutcookies.org. We do not use technology that recognizes do-not-track signals from your browser. You can also opt out of Internet based advertising by installing a browser plugin from the third party where available. For more information about interest-based advertising, please see: http://www.networkadvertising.org/managing/opt_out.asp.

In addition, in the course of seeking network security and consistent service for all users, software programs may be employed to monitor network traffic, identify unauthorized access or access to nonpublic information, detect computer viruses and other software that might damage our computers or the network, and monitor and fine-tune our network's performance. These programs may detect additional information from your computer such as your IP address, addresses from network packets, and other technical information. Any such information is used only for the purpose of maintaining the security and performance of our networks and computer systems.

We may combine the information you provide us and information we automatically collect with information from public or third-party sources.

How Do We Use the Personal Information We Collect?

We will use the information provided by you in order to:

- **respond** to your inquiries on this Site (for example, we may send you electronic or written materials or, if you supply us with your telephone number, you may receive telephone contact from us in response to your request)
- **administer, improve, and personalize** the Site
 - In addition to our own analysis, enhancement, and evaluation activities, we work with Google Analytics to collect information about the use of this Site (including how often users visit the Site and what pages users visited prior to visiting the Site). We use this information to maintain and improve the Site. For information about how Google uses the information, see Google's Terms of Service and the Google Privacy Statement. You can opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout>.

- **maintain network security** and performance and protect against cyber-attacks
- **market** our services to you, including ours, those of our affiliates, and those of other third parties
- **comply** with and enforce applicable laws, industry standards, and our own policies
- **verify your identity**
- **register** and service your online account
- **provide you with** services and products you request
- **allow you to manage** the services you requested
- conduct **research, statistical analysis**, survey/demographical interpretation, and other data studies based on the data collected
- **contact you** when necessary and to respond to your requests and inquiries
- **as otherwise described** to you at the point of collection or **pursuant to your consent**

Who Do We Share Your Data With?

We share or may share your personal information as follows:

- as necessary to **perform the services**
 - We may disclose your personal information to insurance carriers and third-party brokers/agents in connection with providing quotes, administering claims, binding coverages, and other services.
- with **affiliates**
 - to enable them to provide services to you or contact you regarding additional products and services that you have expressed an interest in.
- with **agents and service providers**
 - We sometimes contract with other companies and individuals to perform functions or services for us or on our behalf, such as hosting this Site, sending e-mail messages, and making phone calls. They may have access to personal information, such as email addresses, needed to perform their functions, but are contractually restricted from using such personal information for purposes other than providing services for our company or on our behalf.
- as part of a **business transfer**
 - As we continue to develop our business, we might engage in the transfer of assets. In such transactions, user information generally is one of the transferred business assets. Also, if either our company or any of its assets are acquired (including through bankruptcy proceedings), your personal information may be one of the transferred assets.
- to address **legal concerns**
 - We may preserve, and have the right to disclose any information about you or your use of this Site, without your prior permission if we have a good faith belief that such action is necessary to: (a) protect and defend the rights, property, or safety of our company or its affiliates, other users of this Site, or the public; (b) enforce the terms and conditions that apply to use of this Site; (c) respond to claims that any content violates the rights of third parties; (d) respond to claims of suspected or actual illegal activity; (e) respond to an audit or investigate a complaint or security threat; or (f) comply with applicable law, regulation, legal process, or governmental requests.

We will not disclose, share, sell, or otherwise use your personal information without your consent, except to the extent required by law, in accordance with your instructions, or as identified in this Privacy Statement.

Our third-party affiliates, service providers and successors to whom we disclose information are required by law and/or contractual requirements to keep your personal information confidential and secure. These parties may not use or disclose it except as reasonably necessary to provide services to you, on our behalf, on behalf of your employer, or to comply with or as permitted by applicable law.

We may disclose and/or process your personal information without your prior permission, as permitted by law, including instances when we have a good faith belief that it is necessary to: (a) protect the legal rights, safety, and security of our company, our affiliates and business partners, and users of our site; (b) enforce the Terms of Use; (c) respond to claims of suspected or actual illegal activity; (d) respond to an audit or investigate a complaint or security threat; or (e) comply with law or legal process, or a request for cooperation by a government or other entity. We may also share information that is not reasonably likely to identify you personally for any commercially legitimate business purpose.

What Steps Do We Take to Protect Your Information?

All information that you submit through this Site is collected, stored, and processed in the United Kingdom and/or the United States within Company-controlled databases. We restrict access to your personal information to employees of ours and our affiliates and to service providers who need to use it to provide this Site and our products or services. We have implemented physical, administrative, and technical safeguards to protect your personal information from unauthorized access. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our systems, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet.

How Long Do We Keep Your Information?

We will retain your personal information for as long as is necessary for the processing purpose(s) for which it was collected and other permitted purpose(s), including retention of personal information required by contract, law or regulation. Our retention periods are based on business, legal and regulatory needs with information that is no longer needed either de-identified or securely destroyed.

Cross-Border Transfer of Personal Information

This Privacy Statement is provided in accordance with and subject to U.S. laws. If you access this Site from a location outside the United States, you agree that your use of this Site is subject to the terms of this Privacy Statement and the Terms of Use.

Accessing and Correcting Your Information

Keeping your information accurate and up-to-date is very important. Inaccurate or incomplete information could impact our ability to deliver relevant services to you. Please let us know about any changes that may be required to your personal information using the contact information below.

Questions, Requests or Complaints

To submit questions or requests regarding this Privacy Statement or our privacy practices, please email us at PrivacyPolicyInquiries@marsh.com.

CALIFORNIA RESIDENT PRIVACY TERMS

Scope of this Privacy Notice

These California Resident Privacy Terms are effective January 1, 2020 and supplement the information contained in our above Privacy Notice, and apply solely to consumers who are California residents.

Marsh Sponsored Programs, a division of Marsh USA Inc. (“**We**”) strive to protect the privacy and confidentiality of the personal information with which we are entrusted. This California Resident Privacy Notice explains the personal information we collect or process about California residents in connection with the services we provide or offer to you, including through any site, application, or product that links to this Privacy Notice (the “**Service**”), how we use, share, and protect that personal information, and what your rights are with respect to your personal information that we gather and process.

In this California Resident Privacy Notice, “personal information” has the same meaning as under the California Consumer Privacy Act (“**CCPA**”): information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, Personal information does not include information that has been de-identified or aggregated.

Please also note that in certain cases, we may collect your personal information for the Service pursuant to a contract we have with a commercial client (our “**Client**”). In such circumstances, we may be acting as a “service provider” and are obligated to process the personal information we collect or are provided in connection with the Service in accordance with instructions from or the contract with our Client, which is the business ultimately responsible for determining how your personal information will be handled. Accordingly, if you are using the Service in connection with your role as an employee of our Client, or by virtue of some other relationship with, our Client, we encourage you to review that Client’s privacy notice to understand the full scope of how your personal information will be handled. Further, in any case where we are acting as a service provider to a Client, if you or your authorized agent (together referred to hereinafter, where applicable, as “**you**”) wish to exercise any rights that may be available to you under certain data privacy laws (for example, the right to access or deletion under the CCPA if you are a resident of California as described below), you should direct your request to our Client, who is the party responsible for receiving, assessing, and responding to your requests, as we do not have any obligation, and, notwithstanding anything in this Privacy Notice to the contrary, may elect not, to respond to your requests. If you are not certain whether we are acting as a service provider to a Client in your particular circumstance, please contact us through one of the methods described at the end of this Privacy Notice.

What Personal Information Do We Collect and Share, and for What Purpose?

In the past 12 months, we have collected and shared the following types of personal information from or about users of the Service:

Categories of PI	Examples/Description	Categories of Sources of PI	Business or Commercial Purpose for Collection of PI	Categories of third parties with whom we share the PI
Contact Information	<ul style="list-style-type: none"> Employee ID Account name/number Insurance policy number Mailing address Email address Telephone and fax numbers Contact information for related individuals (household or job) 	<ul style="list-style-type: none"> Directly from you (e.g., when you submit an application or make an inquiry to a service center) Employer Clients 	<ul style="list-style-type: none"> Quotation/ Inception of service Policy Administration/ Claims Processing Provide services to you Compliance/ security monitoring and screening Communicate with you about our products and Services 	<ul style="list-style-type: none"> Insurance carriers and third-party administrators, agents or brokers (e.g. for quotes or placement services) Vendors that we engage in connection with the services Our affiliates in connection with services provided to you or in which you have expressed an interest
Government issued identifiers	<ul style="list-style-type: none"> Social security number Driver's license number State identification card number Benefits recipient number 	<ul style="list-style-type: none"> Directly from you (e.g., when you submit an application or make an inquiry to a service center) Employer Clients 	<ul style="list-style-type: none"> Quotation/ Inception of service Policy Administration/ Claims Processing Provide services to you Compliance/ security monitoring and screening 	<ul style="list-style-type: none"> Insurance carriers and third-party administrators, agents or brokers (e.g. for quotes or placement services) Vendors that we engage in connection with the services
Other unique identifiers	<ul style="list-style-type: none"> Employee ID Account name/number Insurance policy number Username/password 	<ul style="list-style-type: none"> Directly from you (e.g., when you submit an application or make an inquiry to a service center) Employer Clients 	<ul style="list-style-type: none"> Quotation/ Inception of service Policy Administration/ Claims Processing Provide services to you 	<ul style="list-style-type: none"> Insurance carriers and third-party administrators, agents or brokers (e.g. for quotes or

				placement services) <ul style="list-style-type: none"> • Vendors that we engage in connection with the services
Internet & Technical Information	<ul style="list-style-type: none"> • IP address • Data from cookies, web beacons, etc. • Server log records including page requests) 	<ul style="list-style-type: none"> • Indirectly from you (e.g., when you interact with our websites) 	<ul style="list-style-type: none"> • To operate, assess activity on, and improve our websites and the services they support, including the Service 	<ul style="list-style-type: none"> • Vendors who help us operate, assess, and improve the performance of our website
Policy Information	<ul style="list-style-type: none"> • Policy documentation or information submitted in order to obtain quotes • Quotes provided 	<ul style="list-style-type: none"> • Directly from you (e.g., when you submit an application or make an inquiry to a service center) • Employer Clients 	<ul style="list-style-type: none"> • Quotation/ Inception of service • Policy Administration/ Claims Processing • Provide services to you • Communicate with you about our products and Services 	<ul style="list-style-type: none"> • Insurance carriers and third-party administrators, agents or brokers (e.g. for quotes or placement services) • Vendors that we engage in connection with the services
Professional or employment-related Information	<ul style="list-style-type: none"> • Occupation /Title • CV/work history • HR records (benefits, etc.) 	<ul style="list-style-type: none"> • Directly from you (e.g., when you submit an application or make an inquiry to a service center) • Employer Clients 	<ul style="list-style-type: none"> • Quotation/ Inception of service • Policy Administration/ Claims Processing • Provide services to you 	<ul style="list-style-type: none"> • Insurance carriers and third-party administrators, agents or brokers (e.g. for quotes or placement services) • Vendors that we engage in connection with the services
Commercial Information	<ul style="list-style-type: none"> • Purchase history • Service records • Personal property • Customer service records 	<ul style="list-style-type: none"> • Directly from you (e.g., when you submit an application or make an inquiry to a service center) 	<ul style="list-style-type: none"> • Quotation/ Inception of service • Policy Administration/ Claims Processing • Provide services to you 	<ul style="list-style-type: none"> • Insurance carriers and third-party administrators, agents or brokers (e.g. for quotes or

	<ul style="list-style-type: none"> • Communication preferences • Consumer history/trends • Payment preferences • Market research, survey data • Consumer account information and data collected for qualification 			placement services) <ul style="list-style-type: none"> • Vendors that we engage in connection with the services
Audio, video, or visual information	<ul style="list-style-type: none"> • Photos • Call center recordings 	<ul style="list-style-type: none"> • Directly from you (e.g. when you post on our social media pages) 	<ul style="list-style-type: none"> • Provide services to you • Marketing analytics and/or direct marketing (photos only) 	<ul style="list-style-type: none"> • Social media platforms (photos only)

We may also use or share de-identified information that is not reasonably likely to identify you for commercially legitimate business purposes.

We do not sell personal information to any third parties, and have not done so in the preceding 12 months.

Your Rights as a California Resident

Under California law, some California residents have specific rights regarding their personal information as described below. These rights are subject to certain exceptions. Further, if we have collected or processed your personal information in connection with a product or service we are providing to our Client that is a company, partnership, sole proprietorship, nonprofit or government agency, and you are an employee, owner, director, officer, or contractor of that entity, rights 1-3 below are not available to you until at least January 1, 2021.

When required, we will respond to most requests within 45 days, unless it is reasonably necessary for us to extend our response time.

1. Right to Disclosure of Information

You have the right to request that we disclose certain information regarding our practices with respect to personal information. If you submit a valid and verifiable request and we confirm your identity and/or authority to make the request, we will disclose to you any of the following at your direction:

- The categories of personal information we have collected about you in the last 12 months.
- The categories of sources for the personal information we have collected about you in the last 12 months.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we sold your personal information for a business purpose, a list of the personal information types that each category of recipient purchased.
- If we disclosed your personal information to a third party for a business purpose, a list of the personal information types that each category of recipient received.

2. Right to Delete Personal Information

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. If you submit a valid and verifiable request and we can confirm your identity and/or authority to make the request, we will determine if retaining the information is necessary for us or our service providers to:

- Complete a transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If none of the above retention conditions apply, we will delete your personal information from our records and direct our service providers to do the same.

How to exercise the above rights

To exercise your rights to disclosure or deletion described above*, please submit a verifiable consumer request to us by visiting our online privacy rights portal by [clicking here](#).

Alternatively, you may call us at 855-275-5436.

Only you or a person who can demonstrate that they are legally authorized to act on your behalf may make a verifiable consumer request related to your personal information.

You may make a verifiable consumer request for access or deletion no more than twice within a 12-month period. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Such verification process will involve you confirming details of the personal information we have collected about you, and will increase in scope in the event the nature of your request relates to the disclosure of sensitive personal information or the deletion of any personal information. In some instances, you may be required to submit proof of your identity (e.g. a driver's license);
- and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

You will not be required to create an account with us in order to submit a verifiable request, though we may communicate with you about your request via a pre-established account if applicable. However, in order to safeguard the personal information in our possession, if we cannot verify your identity or authority to act on another's behalf, we will be unable to comply with your request. We will only use personal information you provide when submitting a verifiable request to confirm your identity or authority, or to fulfill your request.

3. Right to Opt out of Sales of Your Personal Information

As a California resident, you have the right to direct a business that sells your personal information to third parties not to sell your personal information. This right is referred to as "the right to opt-out."

Because we do not sell your personal information, we do not provide any mechanism for you to exercise the right to opt out.

4. Right to Non-Discrimination

You may exercise your rights under the CCPA without discrimination. For example, unless the CCPA provides an exception, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may offer you financial incentives to provide us with personal information that is reasonably related to the information's value. This could result in different prices, rates, or quality levels for our products or services. Any financial incentive we offer will be described in written terms that explain the material

aspects of the financial incentive program. You must opt-in to any financial incentive program and may revoke your consent at any time by contacting us as indicated below.

5. Direct Marketing and Do Not Track Signals

Under California's "Shine the Light" law, California residents may request and obtain a notice once a year about the personal information we shared with other businesses for their own direct marketing purposes. Such a notice will include a list of the categories of personal information that were shared (if any) and the names and addresses of all third parties with which the personal information was shared (if any). The notice will cover the preceding calendar year. To obtain such a notice, please contact us as described below. In addition, under this law you are entitled to be advised how we handle "Do Not Track" browser signals. Because there currently is not an industry or legal standard for recognizing or honoring Do Not Track signals, we do not honor Do Not Track requests at this time.

Minors

We do not knowingly collect personal information from children under the age of 13. If we learn that we have collected any personal information from a child under the age of 13 without verifiable parental consent, we will delete that information from our files as quickly as possible. If you believe that we may have collected information from a child under 13, please contact us at the email address provided below.

We never sell the personal information of minors under 16 years of age, and would not do so in the future without affirmative authorization of the consumer if between 13 to 16 years of age, or the parent or guardian of a consumer less than 13 years of age.

Questions, Requests or Complaints

To submit general questions or requests regarding this Privacy Notice or our privacy practices, please contact us at PrivacyPolicyInquiries@marsh.com.

To submit a request* to access or delete your information, please visit our online request portal by [clicking here](#).

Alternatively, you may call us at 855-275-5436.

*Please note that, as described above, in certain cases we may collect your personal information as a service provider pursuant to a contract we have with a commercial Client to provide the Service. In any case where we are acting as a service provider to a Client, you should direct your requests to exercise your rights available under data privacy laws to our Client, who is the party responsible for receiving, assessing, and responding to your requests. As a service provider, we do not have any obligation, and, notwithstanding anything in this Privacy Notice to the contrary, may elect not, to respond to your requests.