

Privacy Notice

1. Introduction

This Privacy Notice (“**Notice**”) explains how Aon Hewitt Middle East Ltd and its affiliated companies and subsidiaries (“**Aon**”) makes use of the personal information collected about you in connection with the services. Throughout this Notice Aon may be referred to as “we”, “us”, “our” or “Aon”.

2. Collecting Your Information

2.1 When you request products and/or services from us, we ask that you provide accurate and necessary information that enables us to respond to your request. When you provide personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection (for example producing compensation survey results and consulting deliverables, providing a product price quote, or creating a profile on our websites or mobile applications).

We may collect personal information such as:

- demographic information related to the business performance and operations of our client companies, including, but not limited to, financial metrics, global headcount, global employee distribution and/or locations, and organizational structures/reporting relationships;
- demographic information related to the employees of our client companies, including, but not limited to, job titles, job roles, age, gender and individual performance levels;
- demographic information such as basic personal details, education & professional experience & affiliations, family, lifestyle & social circumstances, basic HR details and employee performance which provides our clients with an outsourced service;
- compensation information related to the operations of our client companies, including, but not limited to, plan documents, pay structures/ranges and plan design, eligibility and metrics;
- Compensation information related to the employees of our client companies, including, but not limited to, base salaries, allowances, bonuses, and long-term cash and equity incentives; or
- other relevant information that may be needed to perform our work, such as occupation, language, zip code, area code, location, and the time zone.

We will not collect any sensitive personal information unless this is strictly required. Sensitive personal information includes a number of types of information relating to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life.

2.2 You are required to provide any personal information we reasonably require (in a form acceptable to us) to meet our obligations in connection with the services we provide to you, including any legal and regulatory obligations. Where you fail to provide or delay in providing information we reasonably require to fulfil these obligations, we may be unable to offer the services to you and/or we may terminate the services provided with immediate effect.

2.3 Where you provide personal information to Aon about third party individuals (e.g. information about your spouse, civil partner, child(ren), dependants or emergency contacts), where appropriate, you should provide these individuals with a copy of this Notice beforehand or ensure they are otherwise made aware of how their information will be used by Aon.

2.4 In addition to collecting personal information from you directly, we may also collect personal information about you from other third parties, such as your employer, vetting and data validation agencies and other professional advisory service providers. This information may be sourced prior to and during the course of providing the services to you.

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3. Processing Your Information

3.1 We will use the information we collect about you in connection with the services to:

a. Performing services for our clients

We process personal information which our clients provide to us to perform our Rewards Solutions and Performance Solutions practices services, analytics, and advisory services. This may impact you, for example, where you are the employee or prospective employee of our client. The precise purposes for which your personal information is processed will be determined by the scope and specification of our client engagement, and by applicable laws, regulatory guidance and professional standards. It is the obligation of our client to ensure that you understand that your personal information will be disclosed to the Rewards Solutions and Performance Solutions practices at Aon as outlined in this Notice.

b. Administering our client engagements

We process personal information about our clients and the employees of our clients to:

- carry out "Know Your Client" checks and screenings prior to starting a new engagement;
- carry out client communications, services, billing, and administration;
- complete client projects;
- secure client feedback;
- deal with client complaints and requests;
- create marketing materials such as white papers, case studies, and social media content; or
- contacting and marketing to our clients.

We also process personal information about our clients/prospective clients and employees of our clients/prospective clients to:

- contact our prospects and clients in relation to current, future and proposed engagements;
- send our prospects and clients newsletters, know-how, promotional material and other marketing communications; or
- invite our prospects and clients to events (and arrange and administer those events).

c. Conducting data analytics

We are an innovative business, which relies on developing sophisticated products and services by drawing on our experience from prior engagements. We are not concerned with an analysis of identifiable individuals, and we take steps to ensure that your rights and the legitimacy of our activities are ensured through the use of aggregated or otherwise de-identified data.

The categories of information we use to conduct data analytics include:

- Basic personal details, education & professional experience & affiliations, family, lifestyle & social circumstances, basic HR details and employee performance.
- Job titles, job roles, age, gender and individual performance levels.
- Compensation information related to the employees of our client companies, including, but not limited to, base salaries, allowances, bonuses, and long-term cash and equity incentives
- Other relevant information that may be needed to perform our work, such as occupation, language, zip code, area code, location, and the time zone

d. **Accounting and Auditing:** transfer books of business to successors of the business in the event of a sale or reorganisation;

e. **Research:** conduct market research and canvass your views about the services in order to develop and improve our products and service offerings generally; a

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If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will generally request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

4. Legal Grounds for Processing

We rely on the following legal grounds to collect and use your personal information:

- a. Performance of the service contract : Where we offer the services or enter into a contract with you to provide the services, we will collect and use your personal information where necessary to enable us to take steps to offer you the services, process your acceptance of the offer and fulfil our obligations in the contract with you.
- b. Legal and regulatory obligations : The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations. For example, Aon is licensed and regulated by the [enter details of the regulator] and is required to provide the service in accordance with relevant regulatory rules.
- c. Legitimate interests : The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, e.g. to operate our business, particularly where we offer other products and services that may be of interest to you or conduct market research to improve our products and services generally. Where we rely on this legal basis to collect and use your personal information we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.
- d. Consent : In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

Before collecting and/or using any special categories of personal information, or criminal record data, we will establish a lawful basis which will allow us to use that information. This basis will typically be:

- your consent;
- establishment, exercise or defence by us or third parties of legal claims; or
- specific exemption provided for under local laws countries

Where we rely on your consent to collect and use your information, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.

Where you choose to receive the services from us you agree to the collection and use of your personal information in the way we describe in this section of the Notice and in accordance with the lawful bases described herein.

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5. Accuracy of Your Information

We rely on the availability of accurate personal information in order to provide the services to you and operate our business. You should therefore notify us of any changes to your personal information, particularly changes concerning your contact details, bank account details or any other information that may affect the proper management and administration of the services provided to you.

6. Recipients of Your Information

We generally share your personal information with the following categories of recipients where necessary to offer, administer and manage the services provided to you:

Within Aon

We may share your personal information with other Aon affiliates companies and subsidiaries to serve you, including for the purposes listed above.

We do not rent, sell or otherwise disclose personal information with unaffiliated third parties for their own marketing use. We do not share your personal information with third parties except in the following circumstances outlined below.

Authorized Service Providers

We may disclose your personal information to service providers we have retained (as processors) to perform services on our behalf (either in relation to services performed for our clients, or information which we use for its own purposes, such as marketing). These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, 'How we use your personal information.'

Examples include:

- IT service providers who manage our IT and back office systems and telecommunications networks;
- marketing automation providers;
- contact centre providers;
- translation agencies; and
- companies who have surveying technology or other market research capabilities and collect insight on our behalf.

These third parties appropriately safeguard your personal information, and their activities are limited to the purposes for which your personal information was provided.

Legal requirements and business transfers

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request. (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation of suspected or actual illegal activity, (v) in the event that we are subject to a merger or acquisition to the new owner of the business, (vi) in connection with company audits or (vii) in order to investigate a complaint or security threat.

7. Overseas Transfers of Your Information

7.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries to be processed for the purposes outlined in the Notice. In particular, we may make such transfers to offer, administer and manage the services provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.

7.2 Where we collect personal information about you in the Dubai International Financial Centre ("DIFC") we may transfer the information to jurisdictions outside the DIFC for the processing purposes outlined in this Statement. This may include transfers to jurisdictions that the DIFC Commissioner for Data Protection ("DIFC Commissioner") considers to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Where

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we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as data transfer agreements approved by the DIFC Commissioner. Where required, further information concerning these safeguards can be obtained by contacting us.

8. Retention of Your Information

We retain appropriate records of your personal information to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you. In most cases we shall retain your personal information for no longer than is required under the applicable laws. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

9. Information Security

The security of your personal information is important to us and we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws.

10. Your Information Rights

10.1 You have the following rights under applicable data privacy laws in respect of any personal information we collect and use about you:

a.	The right to revoke your consent where we are relying upon consent as the lawful basis to process your personal information. Under such circumstances you may also request that we erase your personal information where there is no other lawful basis available to us.
b.	The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you in electronic form.
c.	Where technically feasible, the right to request the correction of your personal information or in cases where the accuracy of information is disputed.
d.	The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
e.	The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
f.	The right to object to the use of your personal information for direct marketing purposes. See section eleven (11) below for further information.
g.	The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed, and you request that the information not be used until its accuracy is confirmed.
h.	The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
i.	The right to object to any decision based solely upon automated processing, including any profiling, which produces legal consequences or other seriously impactful consequences. Under such circumstances you may require us to review such decision manually.
j.	The right to complain to the relevant data protection regulator about our processing of your personal information.
k.	The right not to be discriminated against by exercising any of the rights listed at (a) – (j) above.

10.2 It is important to note, however, that some of the rights described above in section 10.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy laws we will write to you to explain the reason for refusal. Where required, further information concerning these rights and their application can be obtained by contacting us.

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11. Direct Marketing

We will use your personal information to send you direct marketing about other products and services that we feel may be of interest to you. We will give you the opportunity to refuse direct marketing at the point that you apply or register to receive the services and, on each occasion, thereafter that you receive direct marketing communications from us. You can also change your marketing preferences at any stage by contacting us.

12. Complaints

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting us in the first instance:

Robert Richter

Al Fattan Currency House
Dubai International Financial Centre
Tower 2, Level 5
P.O. Box 506746
United Arab Emirates
email: Robert.richter@aon.com

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the relevant data protection regulator.

Commissioner of Data Protection
Level 14
The Gate
P.O. Box 74777
Dubai

Email: commissioner@dp.difc.ae.

13. Changes to this Notice

This Notice is not contractual and Aon reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you. Any updates or changes to this Notice will be made available to you. You should periodically review this Notice to ensure you understand how we collect and use your personal information.

14. Contact Information

If you have any questions about the content of this Notice or the rights conferred to you under the applicable data privacy laws you should contact us at the following address:

Data Protection Officer
Al Fattan Currency House
Dubai International Financial Centre
Tower 2, Level 5
P.O. Box 506746
United Arab Emirates
Phone: +971 (0) 43896300
Email: privacyME@aon.com