

# Aon Privacy Statement

## About Aon

Aon is a leading risk management, employee benefits and insurance broker. We use personal data in order to provide our services. We also work with other organisations or companies including, in any event, insurers. We believe it is very important to handle personal data with care. Therefore, we carefully process and secure personal data, having due regard for privacy legislation.

## Use of personal data

For the provision of our services, Aon uses personal data (data that can be traced back to a private individual), such as:

- name, address, contact details, date of birth, gender, nationality and marital status;
- financial details such as bank account numbers and card details, data on credit history and status as regards bankruptcy or suspension of payments;
- demographic data, such as information about lifestyle and insurance needs;
- data on driving behaviour and details concerning driver's license, insurance history and claims history;
- marketing preferences.

We may also process special data such as criminal data or health data in order, for example, to effect accident -, medical expenses - or professional liability insurances and deal with claims. We will only process the data necessary for the provision of our services. If certain data are not provided, this may prevent us from providing the requested services or processing or paying out a claim. If you provide us with data on third parties (your partner, children, co-insured or data on emergency contacts), we assume that you inform them about the processing of their data by Aon and make them aware of this privacy statement.

Besides the information that you personally provide, Aon may obtain information from third parties. For example, data are processed to prevent fraud against financial institutions and Aon also consults third parties for data on fraud (FRISS) and creditworthiness (Focum). These data may be requested both during and before the provision of our services. In these situations, Aon has a legitimate interest in processing your data. You may object to this processing.

Aon processes the data as part of its business operations, including

- the provision of the services requested by you
- brokerage activities
- claims handling
- investigating claims or complaints in connection with insurance policies or the services provided
- consultancy in the field of risk management
- consultancy on pensions and absenteeism support
- researching customer satisfaction
- internal reporting, statistical analysis, marketing Aon products and services and improving products and services
- investigating creditworthiness and credit control policy
- investigating sanctions imposed, validating data, facilitating prevention, detecting and/or investigating criminal actions
- fulfilling legal obligations
- the provision of other products that may be of interest to you

The information may be stored on internal and external systems, including customer relationship management applications. Through these systems, the Aon employees concerned have access to these data, which they may use solely for the purposes for which Aon processes the data.

### Recording of telephone conversations

Telephone conversations with clients may be recorded at random for purposes of training of Aon customer service employees. Furthermore, certain telephone conversations will be recorded for the following specific, predefined and lawful purposes:

1. Verification of and enquiry regarding requests, transactions and other (precontractual) agreements with a client;
2. For purposes of detection and/or countering fraudulent activities or other criminal activities which may be aimed at Aon, the Aon group of companies or its clients or employees;
3. When obliged by law.

In principle, recorded conversations will only be reviewed in cases where the content of the conversation is unclear or subject to dispute. The recorded conversations and any personal information regarding the recording will be stored in such a manner that these are not accessible by unauthorised persons. Authorizations for access is governed by the Aon Privacy Protocol on access to telephone conversations recordings. Technical and organisational measures have been taken to prevent manipulation of recordings and to ensure that information can be traced and reconstructed. In cases where the contents of a recording gives rise to differences in interpretation or dispute, a client will have the right to listen to the recorded conversation. This enables both Aon and the client to reach an acceptable solution for disputes which arose from transactions which were concluded via telephone conversation.

### Principles and lawfulness for processing by Aon:

#### Performance of the agreement

In connection with the services we provide and the establishment of agreements, we obtain and use the personal data necessary to make an offer, establish and perform the agreement.

#### Compliance with a legal obligation

It may be necessary to process data in order to comply with legal obligations. For example, Aon is required under the Financial Supervision Act to hold a license and is supervised by the AFM. Aon has a duty to abide by the applicable rules.

#### Legitimate interest

The collection and use of certain data is necessary in order to exercise legitimate commercial interests, such as offering products that might be of interest to you or engaging in market research to improve our products and services. When we process your data on this basis, we will make sure that the necessary steps are taken to ensure that the processing does not infringe your rights and freedoms under privacy laws.

#### Consent

We process data on the basis of consent when we process special data in conjunction with activities such as profiling. You are free to withhold or withdraw your consent at any time. However, without your consent, we may not be able to provide our services. Whenever special data are needed and you wish to use our services, you agree to the collection and use of those special data.

### Disclosure to third parties

We engage third parties for the performance of our services. In this context, we may share data with:

- insurers and brokers, when necessary in order to arrange insurance and provide our services;

- assessment offices, lawyers and research companies for work relating to claims and the required reports;
- investigation authorities, where necessary in order to prevent or investigate fraud and criminal acts;
- government authorities, where necessary in order for Aon to fulfil its legal obligations. In connection with motor vehicle insurance, data are shared with the Rijksdienst voor het Wegverkeer (Dutch National Road Authority);
- third parties when work is outsourced. This work will be done under Aon's responsibility, in accordance with our security standards and on our instructions;
- Legal successors, in the event that the services are sold to another organisation or of the takeover or sale of (part of) Aon. If personal data are shared in this situation, the data will continue to be used in accordance with this statement;
- medical experts, e.g. in the case of services relating to medical expenses insurance and claims handling;
- research companies whose services are engaged in connection with research into creditworthiness, criminal past, fraud (and the issue of certificates of good conduct) in order to detect and prevent fraud in the insurance industry.

### Processing outside the EU

Aon is a global organisation with business processes, management structures and technical systems that extend beyond geographical borders. In light of the global nature of the services provided by Aon, personal data may be transmitted to and used, stored and otherwise processed in countries other than the country in which the information was obtained. In all cases, Aon will ensure an adequate level of security by means of the standard EU agreements or a license.

### Security levels

It is our responsibility to ensure the most extensive protection possible for the personal data we process against loss or unauthorised use. We take adequate security measures to guarantee the security and accuracy of those data. If, despite these measures, a data breach were to occur, Aon has a procedure in place for the proper reporting and handling of the breach.

### Direct Marketing

We will use your personal data for direct marketing for other services and products which we believe may be of interest to you. However, we will give you the opportunity to indicate your preferences for direct marketing activities.

### Automatic data collection

Aon may also collect information by means of cookies when you visit an Aon website or use mobile apps. Cookies are small, simple text files that are placed on your computer, tablet or mobile phone when you visit one of our websites or apps. These files store information about your website/app visit, in order to provide you with the best possible service. Aon gives you the opportunity to refuse consent to this automatic data collection. However, if you do not consent, Aon may not be able to (fully) provide its services for you. Find out more [here](#) about our use of cookies.

### Automated processing

Automated processing and decision-making procedures may be used for applications for certain (common) types of insurance. This means that acceptance or rejection will, for example, be determined by a computer system, without any human intervention, based on the data completed by you on a website or application form. Both data of which we already have knowledge and data from third parties may be used as a decision-making basis. This may include checking credit data, claims

history and fraud prevention checks. If a decision is made purely on the basis of automated processing, you will also be offered the option of human intervention.

You have the facility to object to automated processing. To do this, contact Aon's Data Protection Officer (see the contact details further on in this Statement).

### Third party websites

Via Aon's websites, you can click through to other websites that are managed by Aon and its subsidiaries and operating companies in the various countries. Aon may also provide links to websites that are not managed by Aon. Such websites are not monitored by Aon and Aon is not responsible for the privacy policy or content of such external websites.

### Data of minors

Our websites are not aimed at children aged under 16 years.

### Accuracy of data

In order to properly provide our services, we rely on the accuracy of the data available to us. Therefore, we expect that you will inform us of changes to your data.

### Right of access/rectification/objection/data portability and freezing

You have the following rights with regard to your data that we process:

- right of access with regard to the processing of your personal data by Aon;
- the right to have data rectified, frozen and/or deleted, particularly when further processing of your data is no longer required;
- right to object to the use of data for marketing purposes;
- right to object to the further processing of your personal data;
- the right to receive a copy of your data for purposes of transfer to another party.

Some of these rights may only be exercised in specific situations. If we are not able to comply with a request, we will notify you accordingly.

To exercise these rights and obtain further information about this Privacy Statement, please submit your request at [aon.nl/privacyrequest](https://aon.nl/privacyrequest).

Aon keeps your data for as long as is necessary for the purposes for which the data are processed. Aon must also keep data in order to fulfil the duty to keep records and the duty of care, for the purposes of providing evidence and to comply with laws and regulations. After expiry the retention periods, Aon will delete the data.

We reserve the right to delete defamatory, libellous and unlawful posts on the Internet and social media, as well as spam.

If you decide to respond to our content via social media, we may investigate the sender. If it is necessary for us to report such posts, we may also investigate the sender for that purpose.

We value your opinion. Please send your comments or questions about our privacy statement to [compliancebenelux@aon.nl](mailto:compliancebenelux@aon.nl), or write to us at the following address:

Aon Groep Nederland B.V.  
Attn. Legal & Compliance department  
P.O. Box 518  
3000 AM Rotterdam

You can also contact our Data Protection Officer:

Mr. R. Blokland, [rogier.blokland@aon.com](mailto:rogier.blokland@aon.com)

### [Dutch Data Protection Authority \(DPA\)](#)

If you have any complaints about the processing of your personal data by Aon, please inform us so that we can work with you to find a solution. You have the right to submit a complaint to the privacy supervisor, the [Dutch Data Protection Authority](#).

This privacy statement is not an agreement and we may update this privacy statement from time to time. The date of the change will be updated as soon as we make changes. We will inform you of changes in various ways, including by publishing the revised privacy statement on our website, after which the revised statement will take immediate effect. You should consult this statement from time to time to ensure that you are aware of how Aon handles your personal data.

This privacy statement was last updated on October 15<sup>th</sup>, 2018.