

# PRIVACY NOTICE OF GUY CARPENTER FOR CHINA RESIDENT

## 佳达的中国隐私通知

*Last updated April 19, 2022*

*更新于2022年4月19日*

### Introduction

#### 引言

Guy Carpenter Insurance Brokers (Beijing) Co., Ltd. (including its Shanghai branch), with its address at Suite 1109, Office Tower E3, Oriental Plaza 1 East Chang An Avenue, Beijing 100738, People's Republic of China ("Guy Carpenter" or we) strives to protect the privacy and the confidentiality of personal information ("Personal Information") that the company processes in connection with the services it provides to its clients. Guy Carpenter's services consist primarily of reinsurance broking (including treaty reinsurance, facultative reinsurance and structured solutions) and strategic advisory (including capital modelling, catastrophe modelling, portfolio management, and rating advisory services).

佳达保险经纪（北京）有限公司（包括其上海分公司），地址为中国北京市东长安街 1 号东方广场东方经贸城东三办公楼 1109 室（“佳达”或“我们”）致力于保护个人隐私，以及本公司持有的、与本公司向客户提供服务相关的个人信息（“个人信息”）的机密性。佳达的服务主要包含再保险经纪业务（包括条约再保险、临分再保险和结构化解决方案）和策略咨询（包括资本建模、巨灾建模、投资组合管理和评级咨询服务）。

To arrange (re)insurance cover and handle reinsurance claims, Guy Carpenter and other participants in the (re)insurance industry are required to use and share Personal Information. This notice sets out how Guy Carpenter collects, uses, shares and protects your Personal Information, as required by the Personal Information Protection Law of the People's Republic of China ("PIPL") and other related laws and regulations.

为了安排（再）保险保障和处理再保险索赔，佳达及其他（再）保险行业参与者需要使用和共享个人信息。按照《中华人民共和国个人信息保护法》（“《个人信息保护法》”）及其他相关法律法规的要求，本通知阐明佳达如何收集、使用、共享和保护您的个人信息。

During the (re)insurance lifecycle, Guy Carpenter will receive Personal Information relating to representatives of its clients and other reinsurance market participants, insurance policyholders and beneficiaries, claimants and other parties involved in a (re)insurance claim. Therefore references to "individuals" in this notice include any person from the preceding list, whose Personal Information Guy Carpenter receives in connection with the services it provides under its engagements with its clients. This notice sets out Guy Carpenter's uses of the Personal Information and the disclosures it makes to its clients, (re)insurance market participants and other third parties.

在（再）保险业务生命周期内，佳达将获得关于其客户和其他（再）保险市场参与者的代表、保险保单投保人及受益人、索赔人和与再保索赔有关的其他方的个人信息。因此，在本通知中提及的“个人”包括前述清单中的任何个人，佳达因其在与客户的约定项下提供的服务而收到该等人士的个人信息。本通知列明佳达对该等个人信息的使用及其向其他（再）保险市场参与者及其他第三方所作的披露。

## Identity of PI Handler and Entrusted Parties

### 个人信息处理者及委托方的身份和联系方式

Where your Personal Information is processed on <https://www.guycarp.com>, Guy Carpenter & Company LLC of 1166 Avenue of the Americas, New York, NY 10036, USA is the handler in respect of the Personal Information received in connection with your use of the Guy Carpenter website.

如果对您的个人信息的处理是使用佳达网站 <https://www.guycarp.com> 收到的个人信息，Guy Carpenter & Company LLC（位于美国纽约州，地址 1166 Avenue of the Americas, New York, NY 10036, USA）是其处理者。

Where your Personal Information is processed in connection with the services provided by Guy Carpenter or its affiliates with a client under the jurisdiction of the PIPL, the relevant client shall be the handler in respect of the Personal Information, and the relevant Guy Carpenter entity shall be the entrusted party of the Personal Information.

如果对您的个人信息的处理是《个人信息保护法》管辖下佳达或其子公司与客户提供的服务有关，则该客户为个人信息处理者，佳达相关实体为该个人信息的受托方。

## Personal Information That We Process

### 我们处理的个人信息

We may collect and process one or more of the following Personal Information:

我们可收集并处理下列一项或多项个人信息：

- **Individual details** ▶ name, address (and proof of address), other contact details (e.g., email and telephone details), gender, date and place of birth, employer, job title and employment history, education, relationship to the policyholder, insured, beneficiary or claimant.

**个人基本资料** ▶ 姓名、地址（以及地址证明）、其他联络方式详情（如电子邮件和电话详情）、性别、出生日期和地点、雇主、职务和雇用史、教育、与投保人、被保险人、受益人或索赔人的关系。

- **Identification details** ▶ identification numbers issued by government bodies or agencies (e.g., passport number, ID number, driver's license number etc.).

**身份资料** ▶ 由政府部门或机构签发的身份号码（如护照号码、身份证号码、驾驶执照号码等）。

- **Financial information** ▶ payment card number, bank account number and account details, income and other financial information.

**财务信息** ▶ 支付卡号码、银行账号及账户详情、收入及其他财务信息。

- **(Re)insured risk** ▶ Information about the (re)insured risk, which contains Personal Information and may include, only to the extent relevant to the risk being insured:

**(再)受保风险** ▶ 有关受(再)保风险的信息，包含个人信息，并且可能包括（仅在与受保风险相关的范围内）：

➤ **Health data** ▶ current or former physical or mental medical conditions, heredity, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g., smoking or consumption of alcohol, dietary preference), prescription information, medical history;

➤ **健康数据** ▶ 现时或既往的身体或精神医疗状况、遗传、健康状况、伤病或残疾信息、实施的医疗过程、相关个人习惯（如吸烟或饮酒、饮食偏好）、处方信息、医疗记录；

➤ **Criminal records data** ▶ criminal convictions, including driving offences; and

- **犯罪记录数据** ▶ 犯罪前科，包括违规驾驶；及
- **other sensitive Personal Information** ▶ as defined under the PIPL, including information on biometric identification, religious beliefs, specific identity, health care, financial accounts, and personal whereabouts, and persona information of minors under the age of fourteen.
- **其他敏感个人信息** ▶ 定义见《个人信息保护法》，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。
- **Policy information** ▶ information about the insurance policy that individuals have obtained and that are subject to the proposed or actual reinsurance.
 

**保单信息** ▶ 指个人已获得的、拟分保或实际分保的保单的信息。
- **Credit and anti-fraud data** ▶ credit history and credit score, information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies.
 

**信用和反欺诈数据** ▶ 信用记录和信用评分，欺诈定罪信息，从各种反欺诈和制裁数据库、监管机构或执法机构收到的犯罪指控和制裁详情。
- **Previous claims** ▶ information about previous claims, which may include health data, criminal records data and other sensitive Personal Information (as described in the (Re)insured Risk definition above).
 

**以往索赔信息** ▶ 关于以往索赔的信息，可能包括健康数据、犯罪记录数据和其他敏感个人信息 (如上文受(再)保风险的定义所述)。
- **Current claims** ▶ information about current claims, which may include health data, criminal records data and other sensitive Personal Information (as described in the (Re)insured Risk definition above).
 

**当前索赔信息** ▶ 关于当前索赔的信息，可能包括健康数据、犯罪记录数据和其他敏感个人信息 (如上文受(再)保风险的定义所述)。
- **Marketing data** ▶ whether or not the individual has consented to receive marketing from us and from third parties.
 

**营销数据** ▶ 个人是否同意从我们及第三方接受营销。
- **Website and communication usage** ▶ details of your visits to our website and information collected through cookies and other tracking technologies, including, but not limited to, 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.
 

**网站和通讯使用情况** ▶ 您访问我们网站的详细信息，以及通过 **cookies** 和其他追踪技术收集的信息，包括但不限于您的 IP 地址和域名、您的浏览器版本和操作系统、流量数据、位置数据、网络日志和其他通讯数据，以及您访问的资源。
- **Software, tools and application services** ▶ user login details (including user's Personal Information) and details of your usage of Guy Carpenter's software, tools application services.
 

**信息技术、软件、工具服务** ▶ 用户登录详细信息（包括用户的个人信息）以及您使用佳达软件，工具应用程序服务的详细信息。

Where we collect such information directly from individuals, we will inform them of whether the information is required and the consequences of not providing it on the relevant form.

当我们直接向个人收集该等信息时，我们会在相关表格中告知他们该等信息是否是必需的以及不提供信息的后果。

## Sources of Personal Information

### 个人信息来源

We collect and receive Personal Information from various sources, including (depending on the services we are providing):

我们从多个来源收集和接收个人信息，包括（取决于我们提供的服务）：

- Individuals and/or juristic persons and their family members, online, face-to-face, or by telephone, or in written correspondence.

个人及/或法人及其家庭成员，在线、面对面、电话或书面通信。

- Individuals' and/or juristic persons' employers or trade or professional associations of which they are a member.  
个人及/或法人的雇主或他们作为成员的贸易或专业协会。
- In the event of a claim, third parties including the other party to the claim (claimant/ defendant), witnesses, experts (including medical experts), loss adjustors, lawyers and claims handlers.  
在索赔的情况下，第三方，包括索赔的另一方（原告/被告）、证人、专家（包括医学专家）、损失理算人、律师和索赔处理人。
- Other (re)insurance market participants, such as (re)insurers and other intermediaries.  
其他（再）保险市场参与者，例如（再）保险公司及其他中介机构。
- Credit reference agencies (to the extent Guy Carpenter is taking any credit risk).  
征信机构（在佳达承担信用风险的范围内）。
- Anti-fraud databases and other third party databases, including sanctions lists.  
反欺诈数据库和其他第三方数据库，包括制裁名单。
- Government agencies, such as vehicle registration authorities and tax authorities.  
政府机构，如车辆登记机关、税务机关。
- Claim forms.  
索赔表格。
- Open registers and other publicly available information.  
公开登记册及其他公开可获得的信息。
- Business information and research tools.  
商业信息和研究工具。
- Third parties who introduce business to us.  
向我们介绍业务的第三方。
- Data provided by users of our software, tools and application services.  
佳达软件、工具和应用程序服务的用户提供的数据。
- Forms on our website and your interactions with our website (please also see the Cookie Notices on our website).  
我们网站上的表格以及您与我们网站的互动（另请参阅我们网站上的 Cookie 通知）。

## How We Use and Disclose Your Personal Information

### 我们如何使用和披露您的个人信息

In this section, we set out the purposes for which we use Personal Information, and explain how we share the information.

在本节中，我们阐明我们使用个人信息的目的，并解释我们如何共享这些信息。

Please note that in addition to the disclosures we have identified in the table below, we will disclose Personal Information for the purposes we explain in this notice to service providers, contractors, advisers, agents and Marsh & McLennan Companies, Inc. ("MMC") group companies that perform activities on our behalf.

请注意，除我们在下表中列出的披露之外，我们还将为本通知中解释的目的向代表我们开展活动的服务提供商、承包商、顾问、代理人 and Marsh & McLennan Companies, Inc.（“MMC”）集团公司披露个人信息。

Appendix 1 contains a list of the entities with whom we share Personal Information.

附录 1 列出了我们与之共享个人信息的实体名单。

Purpose of Processing 处理目的	Disclosures 披露
<b>Quotation/ Inception 报价/初始阶段</b>	
<p>Establishing a client relationship with a (re)insured or (re)insurer, including fraud, anti-money laundering and sanctions checks 与被（再）保险人或（再）保险人建立客户关系，包括欺诈、反洗钱和制裁检查</p>	<p>Anti-fraud databases, adverse news databases, sanctions databases 反欺诈数据库、不良新闻数据库、制裁数据库</p>
<p>Checking credit where we are taking any credit risk 在我们承担信用风险时进行信用检查</p>	<p>Credit reference agencies 征信机构</p>
<p>Evaluating the risks to be covered and matching to appropriate (re)insurer, policy and premium 评估承保风险，并与适当的（再）保险人、保单和保险费相匹配</p>	<ul style="list-style-type: none"> <li>• (Re)insurers （再）保险人</li> <li>• (Re)insurance intermediaries such as brokers and aggregators （再）保险中介，如经纪商和保险汇总商</li> <li>• (Re)insurance broking platform providers （再）保险经纪平台提供商</li> </ul>
<b>Reinsurance Contract and Insurance Policy Administration</b>	
<b>再保险合同及保单管理</b>	
<p>General client care, including communicating with clients 一般客户服务，包括与客户沟通</p>	<p>(Re)insurers (再)保险人</p>
<p>Collection or refunding of premiums, paying on claims, and processing and facilitating other payments 收取或退还保费，索赔付款，以及处理其他付款和为之提供便利</p>	<ul style="list-style-type: none"> <li>• (Re)insurers (再)保险人</li> <li>• Banks 银行</li> <li>• Debt recovery providers 债务追偿服务提供者</li> </ul>
<b>Claims processing 索赔处理</b>	
<p>Managing (re)insurance claims 管理（再）保险索赔</p>	<ul style="list-style-type: none"> <li>• (Re)insurers (再)保险人</li> <li>• Claims handlers 索赔处理人</li> <li>• Lawyers 律师</li> <li>• Loss adjustors 损失理算人</li> <li>• Experts 专家</li> <li>• Third parties involved in handling or otherwise addressing the claim, such as health care professionals 参与处理或以其他方式应对索赔的第三方（如医疗专业人员）</li> </ul>
<p>Defending or prosecuting legal claims 为法律主张进行抗辩或起诉</p>	<ul style="list-style-type: none"> <li>• (Re)insurers （再）保险人</li> <li>• Claims handlers 索赔处理人</li> <li>• Lawyers 律师</li> <li>• Loss adjustors 损失理算人</li> <li>• Experts 专家</li> <li>• Third parties involved in handling or otherwise addressing the claim, such as health care professionals 参与处理或以其他方式应对索赔的第三方（如医疗专业人员）</li> </ul>
<p>Investigating &amp; prosecuting fraud or possible criminal offences 调查和起诉欺诈或可能的刑事犯罪</p>	<ul style="list-style-type: none"> <li>• (Re)insurers （再）保险人</li> <li>• Lawyers 律师</li> <li>• Law Enforcement Authorities 执法机关</li> <li>• Experts 专家</li> <li>• Other insurers 其他保险人</li> <li>• Anti-fraud databases 反欺诈数据库</li> <li>• Third parties involved in the investigation or prosecution,</li> </ul>

such as private investigators 参与处理或以其他方式应对索赔的第三方（如私人调查员）

### Renewals 续期

Contacting individual representatives at our clients in order to arrange the renewal of the (re)insurance contract  
联系我们客户的个人代表，以安排续订（再）保险合同

- (Re)insurers （再）保险人
- (Re)insurance intermediaries such as brokers and aggregators （再）保险中介，如经纪商或保险汇总商

### Throughout the (re)insurance lifecycle 整个（再）保险业务生命周期期间

Marketing analytics, sending marketing materials and communications including data de-identification and/or aggregation  
营销分析，发送营销材料和通讯，包括数据去标识化和/或汇总

- Insurers 保险人
- Group companies 集团公司

Transferring books of business, company sales and reorganisations  
转让业务账簿、公司出售和重组

- Group companies 集团公司
- Courts 法院
- Purchaser (potential and actual) 卖家（潜在的或实际的）

General risk modelling  
一般风险模型

- Insurers 保险人
- Group companies 集团公司
- Clients and prospects 客户和潜在客户

Analytics including the de-identification of Personal Information for the purposes of analytics  
分析，包括为分析之目的对个人信息进行的去标识化

- Insurers 保险人
- Group companies 集团公司
- Clients and prospects 客户和潜在客户

Complying with our legal or regulatory obligations  
遵守我们的法律或监管义务

- (Re)insurance, data protection and other regulators （再）保险，数据保护和其他监管机构
- Law Enforcement Authorities 执法机关
- (Re)insurers （再）保险人
- Auditors 审计师

### Website activities 网站活动

To communicate with you regarding any queries you raise via the website  
就您通过网站提出的任何疑问与您沟通

- Third parties undertaking online monitoring 从事在线监测的第三方
- Anti-fraud databases, adverse news databases, sanctions databases 反欺诈数据库、不良新闻数据库、制裁数据库

To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud  
监测您与网站的互动，以确保服务质量、程序合规和打击欺诈

To ensure the website content is relevant and presented in the most effective manner for you and your device  
确保网站内容的相关性并以对您和您的设备最有效的方式呈现

### Software, Tools and Applications activities 信息技术、软件、工具活动

To identify and authenticate registered users  
识别和验证注册用户

- Internal software, tools and application holders 内部软件、工具和应用程序负责人

To provide analytic services such as modeling and actuarial services  
提供分析服务，如建模和精算服务

- Modelers 准备模型人员
- Actuarial services providers 精算服务供应商
- Analytics services providers 分析服务提供商
- Credit rating agencies 信用评级机构

Client relationship management including conflict checks

- Anti-fraud databases, adverse news databases, sanctions databases 反欺诈数据库、不良新闻数据库、制裁数据库

客户关系管理，包括任何必要的潜在冲突检查

- Credit reference agencies 征信机构

Marketing and clients profiling activities in connection with Guy Carpenter's services and products

- Group companies 集团公司

与佳达的服务与产品有关的营销及客户分析活动

### Legal and Regulatory Compliance

#### 法律与监管合规

Meeting legal and/or regulatory requirements relating to Guy Carpenter's provision of services and products, and making necessary disclosures under relevant laws, regulations, directions, court orders, by-laws, guidelines, circulars and/or codes

- Law Enforcement Authorities 执法机关
- Courts 法院
- Regulators 监管机构
- Government Bodies or Authorities 政府机构或相干机关
- Auditors 审计师

遵守与佳达提供服务和产品有关的法律和/或监管要求，根据法律、法规、指令、法院命令、章程、指引、通知和/或准则进行披露

We collect and process sensitive Personal Information in strict compliance with the law and only when necessary for specific and legitimate purposes. Such purposes include complying with anti-money laundering and terrorism financing laws, conducting Know-Your-Client checks, providing you with personalized services, protecting your vital interests in emergency, for reasons of public health, or other legitimate purposes. We have adopted strict measures to protect your Personal Information, especially sensitive Personal Information. Failure to provide us with the relevant information may prohibit you from accessing some services we provide, or negatively affect our ability to respond to your requests.

我们严格遵照法律并仅在特定合法目的需要的情况下收集和敏感个人信息。该等目的包括遵守反洗钱和反恐怖主义融资法律、进行“知悉你的客户”核查、向您提供个性化服务、在紧急情况下保护您的重大利益、出于公共卫生原因或其他合法目的。我们已经采取严格的措施保护您的个人信息，尤其是敏感个人信息。不向我们提供相关信息可能会导致您无法使用我们提供的某些服务，或对我们响应您的请求的能力造成负面影响。

## Legal Grounds

### 法律依据

We collect and process Personal Information based on one or more of the following legal grounds as permitted by the PIPL:

我们基于《个人信息保护法》所允许的下列一项或多项法律依据收集和敏感个人信息：

- consent given by the data subjects to the processing of their Personal Information for one or more specific purposes, including with respect to the processing of sensitive Personal Information;  
个人信息主体对于为一个或多个特定目的处理其个人信息（包括敏感个人信息的处理）作出的同意；
- to perform legal duties or legal obligations, for example, to carry out Know-Your-Client, anti-money laundering, terrorist financing, and sanctions checks, or to respond to and comply with requests from governmental, regulatory, tax and law enforcement authorities;  
履行法定职责或法律义务，例如开展“知悉你的客户”、反洗钱、反恐怖主义融资和制裁核查，或回应和遵守政府、监管、税务和执法部门的要求；
- to conclude or perform a contract with the data subjects;  
订立或履行个人信息主体作为一方的合同；
- to implement human resources management in accordance with legally-adopted labour rules and systems and legally-concluded collective contracts;  
按照依法制定的劳动规章制度和依法签订的集体合同实施人力资源管理；
- to respond to public health emergencies, or to protect the data subjects' life, health, and property safety under emergency circumstances;

应对突发公共卫生事件，或在紧急情况下保护个人信息主体的生命健康和财产安全；

- processing, within the reasonable scope, of Personal Information for the public interest;  
为公共利益，在合理范围内处理个人信息；
- processing, within the reasonable scope and in accordance with the PIPL, of Personal Information that has been made public by the data subjects or through other lawful means; and / or  
按照《个人信息保护法》规定在合理范围内处理个人信息主体自行公开或者其他已经合法公开的个人信息；和/或
- other circumstances prescribed by laws and administrative regulations.  
法律、行政法规规定的其他情形。

## Consent

### 同意

In order to facilitate the provision of (re)insurance related services and to administer (re)insurance claims, unless another legal ground applies, we rely on the data subjects' consent to process Personal Information. We will seek and obtain separate consent from data subjects, which is required for certain types of processing activities under the PIPL, e.g., processing sensitive Personal Information, transferring Personal Information abroad, and sharing Personal Information with other intermediaries and (re)insurers that need to process the information in order to undertake their role in the (re)insurance market and that may use the information for the pooling and pricing of risk in a sustainable manner.

为方便提供（再）保险相关服务并管理（再）保险索赔，除非另有法律依据，我们依赖个人信息主体的同意处理个人信息。对于《个人信息保护法》项下需要单独同意的某些类型的处理活动，我们将征求并获得个人信息主体的单独同意，例如：处理敏感个人信息，向境外转移个人信息，与其他中介机构和再保险公司（它们为了发挥其在（再）保险市场的作用需要处理个人信息，并且会为风险归集和定价的目的以可持续的方式使用信息）共享个人信息。

The affected individual's consent may be necessary for Guy Carpenter to be able to provide the services a client request. Where you are providing us with information about other individuals, you agree to notify them of our use of their Personal Information and to obtain their consents for us.

佳达为了提供客户要求的服务，可能需要受影响个人的同意。当您向我们提供其他人的信息时，您同意将我们使用其个人信息一事通知他们，并为我们获取他们的同意。

Individuals may withdraw their consent to such processing at any time by contacting us using the contact details at the Questions, Requests or Complaints section below. However, doing so may prevent Guy Carpenter from continuing to provide the services to the relevant client. In addition, if an individual withdraws consent to a (re)insurer's processing of his or her Personal Information, it may not be possible for the (re)insurance cover to continue, or (re)insurance claims to be processed.

个人可通过使用下文“问题、要求或投诉”部分中的联系方式联系我们，以随时撤回对该等处理的同意。不过，此举可能妨碍佳达继续向相关客户提供服务。此外，如果个人撤回对（再）保险公司处理其个人信息的同意，相关（再）保险保障可能无法继续或（再）保险索赔无法处理。



## Profiling

### 建模

Guy Carpenter and other (re)insurance market participants analyse and compile information received from (re)insureds, beneficiaries or claimants to model the propensities for (re)insured events to occur. Guy Carpenter uses this to help determine (re)insurance premiums, which feed into the cost of (re)insurance premiums across the (re)insurance market. It also uses the output of this exercise to assist in its risk consultancy activities. Accordingly, Guy Carpenter may use Personal Information to both match against the information in existing models and to create new models to assist in determining the premium pricing in general and for other (re)insureds. Guy Carpenter and other (re)insurance market participants may use sensitive Personal Information and Criminal Records Data for such modelling to the extent it is relevant, such as medical history for “life and injury” lines.

佳达及其他（再）保险市场参与者分析并汇编从被（再）保险人、受益人或索赔人收到的信息，以建立（再）保险事故发生倾向的模型。佳达借此来帮助判断（再）保险费，该等费用将计入整个（再）保险市场的（再）保险费成本。佳达还使用该方法的结果来协助其风险咨询活动。相应地，佳达既会使用个人信息来与现有模型中的信息进行匹配，也会用其创建新的模型，以协助一般性地及为其他（再）被保险人确定保费定价。佳达和其他（再）保险市场参与者可能使用有关的敏感个人信息和犯罪记录数据进行该等建模，例如为“生命和伤害”业务使用医疗记录信息。

Guy Carpenter and other (re)insurance market participants use similar predictive techniques to assess information that clients and individuals provide to understand fraud patterns and the probability of future losses actually occurring in claims scenarios.

佳达和其他（再）保险市场参与者使用类似的预测技术来评估客户和个人提供的信息，以了解欺诈模式和未来损失在索赔场景中实际发生的概率。

We use these models only for the purposes listed in this Privacy Notice, and, in most cases, our staff make decisions based on the models.

我们仅将这些模型用于本隐私通知中列出的目的，并且，在大多数情况下，我们的员工基于这些模型做出决定。

## Safeguards

### 安全措施

We have in place physical, electronic, and procedural safeguards appropriate to the sensitivity of the information we maintain. These safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Information, and include measures designed to keep Personal Information protected from unauthorized access. If appropriate, the safeguards include the encryption of communications via Secure Sockets Layer, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols. We restrict access to Personal Information to personnel and third parties that require access to such information for legitimate, relevant business purposes.

我们已根据我们持有信息的敏感度采取适当的物理、电子和程序安全措施。这些安全措施将根据个人信息的敏感度、格式、位置、数量、分发和存储而有所不同，包括旨在防止未经授权访问个人信息的措施。在适当的情况下，安全措施包括通过安全套接字层（SSL）对通信进行加密、存储过程中的信息加密、防火墙、访问控制、职责分离和类似的安全规程。我们限制对个人信息的访问，只有为合法或相关业务目的而需要访问个人信息的员工和第三方才可以访问相关个人信息。

## Limiting Collection And Retention of Personal Information

### 限制收集和保存个人信息

We collect, use, disclose and otherwise process Personal Information that is necessary for the purposes identified in this Privacy Notice or as permitted by law. If we require Personal Information for a purpose inconsistent with the purposes we identified in this Privacy Notice, we will notify clients of the new purpose and, where required, ask that they obtain individuals' consent to process Personal Information for the new purpose.

我们收集、使用、披露和以其他方式处理本隐私通知所述目的所需或法律允许的个人信息。如果我们为了与本隐私通知所述目的不一致的另一目的需要个人信息，我们将告知客户新目的，并在必要时，要求客户获得个人对于为新目的处理个人信息的同意。

Our retention periods for Personal Information are based on business needs and legal requirements. We keep Personal Information for no longer than necessary in relation to the purposes for which we collect and use the Personal Information. After the relevant purposes are realized, we will either (a) delete the Personal Information, or (b) stop all processing activities in connection with the Personal Information (except for storing the same with necessary security measures), if deletion is technically unfeasible or we are legally required to keep those data longer.

我们根据业务需要和法律要求确定个人信息的保存期限。我们保存个人信息的时间不会超过我们收集和使用个人信息的目的所需要的时间。在相关目的实现后，我们将会：（一）删除个人信息，或者（二）如果删除在技术上不可行或法律要求我们保存更久，则停止所有与个人信息相关的处理活动（但在采取必要的安全措施下保存该等个人信息除外）。

## Cross-Border Transfer of Personal Information

### 个人信息的跨境传输

Guy Carpenter transfers Personal Information to, or permits access to Personal Information from, countries/regions outside the People's Republic of China. The data protection laws of these countries/regions do not always offer the same level of protection for Personal Information as offered in the People's Republic of China. We will, in all circumstances, safeguard Personal Information as set out in this Privacy Notice.

佳达向中华人民共和国境外的国家/地区传输个人信息，或者允许他人从中华人民共和国境外的国家/地区访问个人信息。此等国家/地区的数据保护法律并不总是为个人信息提供与中华人民共和国相同的保护水平。我们在所有情况下都会按照本隐私通知所述规定保护个人信息。

If we transfer Personal Information to other countries/regions outside the People's Republic of China, we will establish legal grounds justifying such transfer (such as security review, personal information protection certification, or standard form data transfer agreement), obtain individuals' separate consent, conduct personal information protection impact assessment, and satisfy other applicable legal requirements.

如果我们向中华人民共和国境外的其他国家/地区传输个人信息，我们将确立合法的传输依据（例如安全评估、个人信息保护认证或标准格式数据传输协议），取得个人的单独同意，开展个人信息保护影响评估，并满足其他适用的法律要求。

As part of the MMC group, a business operating globally, we may provide and transfer your Personal Information to certain local and overseas recipients as set out in Appendix 1.

作为全球运营的 MMC 集团的一部分，我们可能会将您的个人信息提供和传输给附录 1 中的某些境内及境外接收者。

Except where required or permitted by law, we will not publicly disclose your Personal Information without seeking and obtaining your separate consent.

除法律要求或准许之外，在未征求并取得您的单独同意的情况下，我们不会公开披露您的个人信息。

## Accuracy, Accountability, Openness And Your Rights

### 准确性、问责性、公开性和您的权利

We strive to maintain Personal Information that is accurate, complete and current. Individuals should contact us using the contact details at the Questions, Requests or Complaints section below to update their information.

我们努力维护准确、完整且最新的个人信息。个人应通过下文“问题、请求或投诉”部分中的联系方式联系我们，以更新他们的信息。

Questions regarding Guy Carpenter's privacy practices should also be directed to our privacy team using the contact details at the Questions, Requests or Complaints section below. Under certain conditions, individuals have the right:

有关佳达隐私实践的问题也应通过下文“问题、请求或投诉”部分中的联系方式提交给我们的隐私保护团队。相关条件满足时，个人享有以下权利：

- to be informed of our processing activities and to make decisions with respect to their Personal Information in accordance with applicable law;  
根据适用法律了解我们的处理活动并就其个人信息作出决定；
- to consult and copy their Personal Information;  
查阅和复制其个人信息；
- to correct or supplement their Personal Information if the information we hold is inaccurate or incomplete;  
如我们持有的信息不准确或不完整，更正或补充其个人信息；
- to request us to delete any Personal Information that we no longer have a lawful ground to use; if deletion is technically unfeasible or we are required by law to keep the information longer, we will stop all processing activities in connection with the Personal Information except for storing the same by taking necessary security measures;  
要求我们删除我们不再有合法依据使用的任何个人信息；如果删除在技术上不可行或法律要求我们保存更长的时间，我们将停止与个人信息相关的所有处理活动，但通过采取必要的安全措施进行存储除外；
- to object to direct marketing (including any profiling for such purposes);  
拒绝直接营销（包括为该等目的进行的任何画像分析）；
- to refuse or restrict the processing of their Personal Information in accordance with applicable law;  
根据适用法律拒绝或限制处理其个人信息；
- to request us to explain our processing rules for Personal Information;  
要求我们解释我们的个人信息处理规则；
- to request us to transfer their Personal Information to the Personal Information handler they designate when the legal conditions for such transfer are satisfied; and  
在满足转移的法定条件时，要求我们将其个人信息转移至其指定的个人信息处理者；及
- to request us to explain decisions that have significant impact on their rights and interests and are made through automated decision-making technologies, and to refuse decisions made solely via automated decision-making technologies.  
对于通过自动化决策技术做出的对其权益有重大影响的决定，要求我们作出解释，以及拒绝仅通过自动化决策技术做出的决定。

The exercise of these rights is subject to certain exemptions and limitations required or permitted by law and a reasonable fee may be charged (where permitted under applicable laws). If you exercise any of these rights, we will check your entitlement and respond in most cases within 30 days.

上述权利的行使受限于法律要求或准许的某些豁免和限制，并且可能会收取合理的费用（在适用法律准许的情况下）。如果您行使任何上述权利，我们将核实您的资格并在大多数情况下在 30 日内回复。

## Questions, Requests or Complaints

### 问题、请求或投诉

To submit questions or requests regarding this Privacy Notice or Guy Carpenter's privacy practices or to exercise your rights in relation to the Personal Information with us or the recipient(s) with whom we share Personal Information, please write to the Guy Carpenter privacy team at the following address:

如欲就本隐私通知或佳达的隐私保护实践提出问题或请求，或者向我们或我们与之共享个人信息的接收者行使与个人信息有关的权利，请致函佳达隐私保护团队，联系方式如下：

**Guy Carpenter Insurance Brokers (Beijing) Co., Ltd.**

Suite 1109, Office Tower E3  
Oriental Plaza 1 East Chang An Avenue  
Beijing 100738, P.R. China  
Email: [privacy.china@guycarp.com](mailto:privacy.china@guycarp.com)

**佳达保险经纪（北京）有限公司**

中国北京市东长安街 1 号东方广场东方经贸城东三办公楼 1109 室  
邮编 100738  
邮箱: [privacy.china@guycarp.com](mailto:privacy.china@guycarp.com)

Our website, software, tools and applications may contain links to other third party websites, software, tools and applications. If you follow any such links, please note that they may have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your Personal Information. Please check these policies before you submit any Personal Information to them.

我们的网站、信息技术、软件及工具可能包含其他第三方网站、信息技术、软件及工具的链接。如果您点击任何该等链接，请注意他们可能有自己的隐私政策，我们对他们的政策或他们对您的个人信息的处理不承担任何责任。在您向他们 站提交任何个人信息之前，请查看他们的政策。

## Changes to This Privacy Notice

### 本隐私通知的变更

This Privacy Notice is subject to change at any time. It was last changed on April 19, 2022. We will take reasonable steps to notify you of the changes and seek your consent if required by applicable law.

本隐私通知可随时变更。本隐私通知最后一次更新于 2022 年 4 月 19 日。若适用法律要求，我们将采取合理措施通知您该等变更并征求您的同意。

## Appendix 1 List of Recipients of Personal Information

### 附录 1 个人信息接收者名单

Name 名称	Registered Address 注册地址
Marsh & McLennan Companies, Inc.	1166 Avenue of the Americas, New York, NY 10036, USA
Guy Carpenter Insurance Brokers (Beijing) Co., Ltd. (including its Shanghai branch) 佳达保险经纪（北京）有限公司（包括其上海分公司）	Suite 1109, Office Tower E3, Oriental Plaza 1 East Chang An Avenue, Beijing 100738, P.R. China 中国北京市东长安街 1 号东方广场东方经贸城东三办公楼 1109 室
Guy Carpenter & Company Private Limited	138 Market Street #07-05 CapitaGreen, Singapore 048946
Guy Carpenter & Company, LLC	1166 Avenue of the Americas, New York, NY 10036, USA
Guy Carpenter & Company, LLC (Taiwan Branch)	4/F, No. 2, Sec. 3 Minquan East Road, Taipei 104, Taiwan
Guy Carpenter & Company Limited	1 Tower Place West, Tower Place, London EC3R 5BU, United Kingdom
Marsh Limited	1 Tower Place West, Tower Place, London EC3R 5BU, United Kingdom
Guy Carpenter Japan, Inc.	Business Address: Midtown Tower, 17F, 9-7-1 Akasaka, Minato-ku, Tokyo 107-6216, Japan
Guy Carpenter & Company Pty. Ltd.	One International Towers Sydney, 100 Barangaroo Avenue, Barangaroo NSW 2000 Australia 727 Collins Street, Melbourne, VIC 3000 Australia
Guy Carpenter & Company, Limited	Suite 3402-3406, 34/F, One Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong
Guy Carpenter & Co. Labuan Limited	Level 42-01 (West Wing), Q Sentral, 2A Jalan Stesen Sentral 2, Kuala Lumpur Sentral, 50470 Kuala Lumpur, Malaysia
Marsh Korea Inc. (Guy Carpenter division)	38/F, Three IFC, Gukjegeumyung-ro, Yeongdeungpo-gu, Seoul 07326, Korea
PT. Marsh Reinsurance Brokers Indonesia (Guy Carpenter division)	Jl. Jend. Sudirman Kav. 29 – 31, World Trade Center 3, 16th Floor, Jakarta 12920, Indonesia
Marsh Pty. Ltd.	One International Towers Sydney, 100 Barangaroo Avenue, Sydney NSW 2000, Australia
Mercer (Australia) Pty Ltd	Level 15, Collins Square, 727 Collins Street, Docklands VIC 3008, Australia

This is an internal publication that may contain proprietary or otherwise sensitive information. It is for employees of Guy Carpenter and must not be shared with anyone outside the firm.

Copyright © 2022, Guy Carpenter & Company LLC. All rights reserved.