

GUY CARPENTER CANADIAN PRIVACY NOTICE

Effective Date: September 22, 2023

OUR COMPANY

Guy Carpenter & Company, Ltd. (“Guy Carpenter”) and other Canadian affiliates of Guy Carpenter are affiliates of Marsh & McLennan Companies, Inc. (“MMC”). This Privacy Notice is issued on behalf of the Canadian Guy Carpenter affiliates within the MMC group, and when we mention “MMC”, “we”, “us” or “our” in this Privacy Notice, we are referring to the relevant company in the MMC group responsible for processing the information.

OUR BELIEFS REGARDING THE PRIVACY OF YOUR INFORMATION

We believe strongly in protecting the privacy and the confidentiality of the information that identifies or relates to an identifiable individual (“personal information” or “personal data”) that we collect, use, disclose, store, and transmit (“process”) while providing insurance and risk advisory services, wealth, health and career consulting and other services or solutions (the “Services”). This Privacy Notice is intended to inform you of the ways in which we collect, use, and disclose personal information, and sets forth your rights.

This Privacy Notice is subject to change at any time. If we make changes to this Privacy Notice, we will update the “Effective Date” at the top of this page and post it on our websites, portals, applications or tools where applicable (collectively, the “Sites”).

Our contractual commitments to clients will supersede any terms in this Privacy Notice. In some instances, our Services may be subject to additional privacy notices or related disclosure. In the event of a conflict or inconsistency between this Privacy Notice and any service-specific privacy notice or related disclosure, the latter shall prevail.

PERSONAL INFORMATION WE COLLECT

The types of personal information we collect will vary depending on the nature of our relationship with our clients, such as the type of product or service we provide and the type of Site being accessed. Our goal is to limit the personal information that we collect to that which will allow us to fulfill our intended business purposes. Failure to provide us with information may prohibit us from delivering requested services.

Generally, we may collect and process the following types of personal information about individuals and, if required for the services provided, their dependents or beneficiaries under an employer, association, group or benefit program sponsor:

- **Information voluntarily provided by you**
When using this Site, you may choose to provide us with information to help serve your needs. The personal information that we collect will depend on how you choose to use this Site.
- **Online Employment Applications**
We may ask for your name, e-mail address, country, telephone number, as well as information about your position and organization and such other information as is reasonably necessary. Any personal information that you send us will be used only for the purpose indicated on the Site or in the Privacy Policy, and in accordance with the ‘Privacy Agreement’ you will be requested to accept when making the online application.

- **Site-Related Information**

As you navigate the Site, we may also collect information through the use of commonly used information gathering tools, such as 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 links that you access.

HOW WE COLLECT PERSONAL INFORMATION

Collection by Automated Means

We use cookies on our company-branded websites. If available, Site users can opt-out of our use of certain cookies using our Cookie Management Tool linked at the bottom of the site. To find out more about how we use cookies, please see our Cookie Notice for [Guy Carpenter](#).

DISCLOSURE OF YOUR PERSONAL INFORMATION

We will not exchange or sell or otherwise distribute your personal information outside MMC without your consent except in accordance with your instructions (including providing the services you have contract with us to provide to you) or as identified in this Privacy Policy. This Privacy Policy is not applicable to personal information that is already in the public domain, or that has been received independently from a third party on the understanding that the individuals to whom the personal information related have been informed of the reason(s) for obtaining the personal information and the fact that they may be disclosed to the third parties such as MMC. We may disclose this information as described below:

- **Providing Services**

In the normal course of performing services for our clients, personal information may be shared within MMC for research and statistical purposes, system administration and crime prevention or detection. When you supply us with information containing third party personal information (names, addresses, or other information relating to living individuals), we will hold and use that personal information to perform services for you on the understanding that the individuals to whom the personal information related have been informed of the reason(s) for obtaining the personal information and the fact that it may be disclosed to third parties.

- **Agents and Service Providers**

We sometimes contract with other companies and individuals to perform functions or services on our behalf, such as hosting this Site, sending e-mail messages and making phone calls on our behalf. They may have access to personal information, such as addresses, needed to perform their functions but are restricted from using it for purposes, other than providing services for Guy Carpenter.

- **Business Transfers**

As we continue develop our business, we may sell or buy assets. In such transactions, user information, including person information, generally is one of the transferred business assets. Also, if either Guy Carpenter itself or substantially all of its assets were acquired, your personal information may be one of the transferred assets. There, we may disclose and/ or transfer your personal information to a third party in these circumstances.

- **Legal Matters**

Guy Carpenter may preserve and has the right to disclose without your prior permission any personal information about you or your use of this Site if Guy Carpenter has a good faith belief that such an action is necessary to: (a) protect and defend the rights, property or safety of MMC employees, or other users of this Site, or the public; (b) enforce the terms and conditions that apply to the use of this Site; or (c) respond to claims that any context violates the rights or third-

parties. We may also disclosure personal information as we deem necessary to satisfy any applicable, law regulation, or legal process or governmental request.

STEPS WE TAKE TO PROTECT YOUR INFORMATION

Our company has a dedicated Chief Information Security Officer (CISO) who is responsible for managing a Global Information Security team and a comprehensive cybersecurity program. As part of such program, we have implemented commercially reasonable physical, administrative, and technical safeguards in an effort to protect your personal information from unauthorized access, use, alteration and deletion. These safeguards may 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.

Our cybersecurity program has policies and procedures for risk assessments to identify and assess cyber risks, as well as technical controls and processes to detect, respond to and recover from cybersecurity events.

As effective as our cybersecurity program is, 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.

YOUR DATA PROTECTION RIGHTS

You may have some or all of the following rights in relation to the personal information we collect about or from you, depending on the jurisdiction and our reason for processing your information:

- **Right of Access**
You may ask us to confirm whether we are processing your personal information, the sources, categories of persons who have access to the information within our company, the retention period. You may also have a right to receive a copy of personal information, where technically feasible.
- **Right to Correct/Rectify**
If the personal information we hold about you is inaccurate or incomplete, you may be entitled to request to have it corrected, considering the nature of the personal information and the purposes of the processing of your personal information.
- **Right to Withdraw Consent**
If we rely on your consent as our legal basis for processing your personal information, you may have the right to withdraw that consent. If you withdraw your consent, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you.

If you wish to exercise any of the above rights or opt out of marketing communications, please [complete this form](#).

For your protection, we will validate the identity of anyone making a request relating to your personal information. We will respond to your request in the timeframe required under law unless it is reasonably necessary for us to extend our response time.

CROSS-BORDER TRANSFERS

There are circumstances in which we will transfer your personal information out of the country, province or territory in which it was collected for the purposes of carrying out the services we provide to you. Where the need for such a transfer arises, we will take steps to ensure that there are appropriate safeguards in place to protect your personal information such as an impact assessment, appropriate contractual protections, or an adequacy decision by the appropriate supervisory authority.

OTHER INFORMATION YOU SHOULD KNOW

Our Sites may include links to websites that are operated by third-party organizations. If you access another organization's website using a hyperlink on our Site, the other organization may collect information from you. We are not responsible for the content or privacy practices of linked websites or their use of your information. If you leave a MMC Site via such a link (you can tell where you are by checking the URL in the location bar on your browser), you should refer to that websites' privacy policies, terms of use, and other notices to determine how they will handle any information they collect from you.

QUESTIONS OR CONCERNS

To submit questions or requests regarding this Privacy Notice or our privacy practices, please email us as specified below:

Guy Carpenter: privacy@guycarp.com

If you would prefer to contact us by post, please contact our privacy office using the following contact details:

Chief Privacy Officer – US/Canada
Marsh & McLennan Companies, Inc.
1166 Avenue of the Americas
New York, NY 10036

If we are unable to resolve an enquiry or a complaint, individuals may have a right to contact the applicable supervisory or regulatory authority. For more information about how to contact your supervisory or regulatory authority, please email us at privacy@guycarp.com.