

# Guy Carpenter US Privacy Notice

Last Updated: October 13, 2023

## Our Role

Guy Carpenter & Company, LLC (“**We**”) strive to protect the privacy and confidentiality of the personal information with which we are entrusted. This Privacy Notice (this “**Notice**”) is intended to inform you of our policies and practices regarding the collection, use, retention, and disclosure of any personal information that we collect or receive about you in connection with our provision of reinsurance intermediary services, including analytical, advisory or risk transfer activities conducted in conjunction with such services (our “**Services**”).

We provide our Services pursuant to a contract with our corporate client (“**Client**”), which is the business ultimately responsible for determining how your personal information will be processed. As such, we act as a “service provider” when it comes to handling personal information, which means all of the personal information that we collect from or about you in connection with our Services is processed under the direction of our Client and governed by our agreement with our Client. We have no direct ownership over your personal information. Instead, our collection, use, sharing, and retention of your personal information is limited to providing the Services for which our Client has engaged us.

Accordingly, if you disclose personal information to us in connection with your role as an employee of our Client, or by virtue of some other relationship you have 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 wish to exercise any rights that may be available to you under law, you should direct your request to our Client, who is the party responsible for receiving, assessing, and responding to your requests. If you submit a request directly to us in a scenario where we only process your information as a service provider or processor, we may be required to deny your request.

If you are not certain what our role is with respect to your personal information, please contact us through one of the methods described at the end of this Notice.

## What Personal Information Do We Collect and Disclose, and For What Purpose?

We may collect, process and disclose the following types of personal information in order to provide our Services:

Categories of Personal Information	Examples/Description	Categories of Sources of Personal Information	Business or Commercial Purpose for Collection of Personal Information	Categories of third parties with whom we share the Personal Information
Government-issued identifiers	<ul style="list-style-type: none"> <li>• Social security number</li> <li>• Driver’s license number</li> <li>• State identification card number</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>
Other Unique Identifiers	<ul style="list-style-type: none"> <li>• Employee ID</li> <li>• Account name/number</li> <li>• Insurance policy number</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>

Contact Information	<ul style="list-style-type: none"> <li>• Honorifics</li> <li>• Company or school name</li> <li>• Title</li> <li>• Alias</li> <li>• Mailing address</li> <li>• Email address</li> <li>• Telephone and fax numbers</li> <li>• Contact information for related individuals (household or job)</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>
Individual Attributes	<ul style="list-style-type: none"> <li>• Marital status</li> <li>• Race</li> <li>• Religion</li> <li>• National origin</li> <li>• Veteran status</li> <li>• Gender</li> <li>• Age</li> <li>• Physical or mental disability</li> <li>• Sexual orientation</li> <li>• Beneficiaries/Dependents</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>

Financial Information	<ul style="list-style-type: none"> <li>• Financial account numbers</li> <li>• Insurance account numbers</li> <li>• Payment card data</li> <li>• Consumer reporting data</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>
Health Information	<ul style="list-style-type: none"> <li>• Patient records, clinical trial records</li> <li>• Information about a consumer's diagnosis or treatment for health conditions</li> <li>• Information about payment for healthcare services</li> <li>• Data collected by a healthcare provider or health insurance company subject to HIPAA or CMIA</li> <li>• Disability status</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>

- Medical fitness for work records
- Inferred data (health)

Policy Information	<ul style="list-style-type: none"> <li>• Any policy documentation or information submitted in order to obtain quotes</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>
Professional or Employment-related records	<ul style="list-style-type: none"> <li>• Titles</li> <li>• CV/work history</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>• Purchase history</li> <li>• Service records</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> </ul>

	<ul style="list-style-type: none"> <li>• Personal property</li> <li>• Customer service records</li> <li>• Communication preferences</li> <li>• Shopping preferences</li> </ul>	<ul style="list-style-type: none"> <li>• plan member who named you as a beneficiary</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>
Audio, video, or visual information	<ul style="list-style-type: none"> <li>• Call center recordings</li> <li>• Voicemails</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you (or from a current or former plan member who named you as a beneficiary)</li> <li>• Your employer, plan sponsor or their administrator</li> <li>• Third Party Suppliers</li> <li>• Insurance carriers and/or agents and brokers</li> </ul>	<ul style="list-style-type: none"> <li>• Quotation/Inception of service</li> <li>• Policy Administration/Claims Processing</li> <li>• Providing Service(s) to the Client</li> <li>• Marketing analytics and direct marketing</li> <li>• Communicate with individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Client/Employer</li> <li>• Non-client business partners (i.e. received from TPA/MGA/Agent/Broker)</li> <li>• Vendor/service providers</li> </ul>

“Categories of sources” means types or groupings of persons or entities from which a business collects personal information about consumers, described with enough particularity to provide consumers with a meaningful understanding of the type of person or entity. They may include the consumer directly, advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, social networks, and data brokers.

“Categories of third parties” means types or groupings of third parties with whom the business discloses personal information, described with enough particularity to provide consumers with a meaningful understanding of the type of third party. They may include advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, social networks, and data brokers.

Note that the California Consumer Privacy Act requires us to describe the personal information we collect by reference to certain statutory categories of personal information described in Section 1798.140(v)(1) of the California Civil Code. All of the personal information we collect may include “identifiers” and “personal information” (as described in Section 1798.80 of the California Civil Code); the profile data we collect may include “characteristics of protected classifications” and “visual information” (if you use a profile photo); the marketing data and transaction data we collect includes “commercial information”; the online activity data we collect may include “internet activity information” and “geolocation data”; your account credentials and your device’s precise geolocation are “sensitive personal information”; and we may derive inferences from all of the foregoing.

We may also process or disclose de-identified information that is not reasonably likely to identify you for commercially legitimate and lawful business purposes. Where we have de-identified data, we will maintain and use it without attempting to re-identify the data other than as permitted under law.

We do not sell personal information to any third parties and have not done so in the preceding 12 months. We may share your information for cross-context targeted advertising purposes utilizing advertising cookies if you visit certain of our sites, as indicated in the above chart. To understand whether we use advertising cookies on a particular site, and to opt out of our use of cookies, please click on the “Manage Cookies” link at the bottom of the site, where available. Note that we may not offer a Cookie Consent Manager on our websites that utilize only Strictly Necessary Cookies, since it is not possible for you to opt in or out of our use of these mandatory cookies. For more information, please refer to our [Cookie Notice](#).

## Your Rights Under Certain US State Privacy Laws

Under certain state privacy laws, residents of the applicable states may have the following rights regarding their personal information. These rights are subject to exceptions.

Please note that, in many cases, we collect personal information on behalf of our commercial clients, pursuant to a contract. In such circumstances, we act as a “service provider” or “processor” to our clients under applicable privacy laws and are thus obligated to process personal information in accordance with clients’ instructions. Accordingly, in any case where we are acting as a service provider or processor to a client, if you or your authorized agent wish to exercise any of the below rights, you should direct your request to our client, who is the party responsible for receiving, assessing, and responding to your requests. If you submit a request directly to us in a scenario where we only process your information as a service provider or processor, we may be required to deny your request. If you are not certain what our role is with respect to your personal information, please contact us through one of the methods described at the end of this Notice.

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 Confirm or Access Information**

You may have the right to confirm whether we process your personal information or what information we process, and to obtain a copy of that information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another business without hindrance. 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 (with various exceptions):

- The categories of personal information we have collected about you.
- The categories of sources for the personal information we have collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties to whom we disclose that personal information.
- 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.
- The specific pieces of personal information we collected about you.

### **2. Right to Delete Personal Information**

You may 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 permitted or required under law.

If no retention conditions apply, we will delete your personal information from our records and direct our service providers to do the same.

### **3. Right to Correct Personal Information**

You may have the right to correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of your personal information. If you submit a valid and verifiable request and we can confirm your identity and/or authority to make the request, we will use commercially reasonable efforts to correct the inaccurate information.



#### **4. Right to Limit Processing of Sensitive Personal Information**

We process sensitive personal information solely as necessary in performance of the Services, to ensure the security and integrity of the information, or as otherwise authorized under law or regulation. Because we do not process your Sensitive Personal Information for other purposes, we do not provide any mechanism for you to limit our processing of such information.

#### **5. Right to Opt-out of Profiling**

We do not engage in automated processing of personal Information to make decisions that produce a legal or other significant effect. Because we do not engage in such automated processing, we do not provide a mechanism for you to limit our processing of personal information in such a manner.

#### **6. Right to Non-Discrimination**

You may exercise your rights under law without discrimination. For example, unless applicable law 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.

#### **7. 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 disclosed to other businesses for their own direct marketing purposes. Such a notice will include a list of the categories of personal information that were disclosed (if any) and the names and addresses of all third parties with which the personal information was disclosed (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 DNT signals, we do not honor Do Not Track requests at this time.

### **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 **1-855-246-3834**.

\*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.

Only you or a person legally authorized to act on your behalf may make a verifiable consumer request related to your personal information. To designate an authorized agent, we may require you to verify your identity or confirm with us directly that you have provided permission to your authorized agent, or we will rely on a power of attorney you have provided to your authorized agent.

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. Depending on the nature of your request and the sensitivity of the information, we may ask you to confirm various data elements we already have on file, such as your mailing address and phone number, or, in the event you request access to sensitive personal information, we may require you to submit a copy of a government-issued form of identification.

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 process and retain personal information you provide when submitting a verifiable request only to confirm your identity or authority, or to fulfill your request.

### **How to appeal an action we have taken with respect to your request to exercise a right**

In order to appeal a decision or denial we have made with respect to your personal information and a right you have requested to exercise in relation thereto, please contact us at [privacy@guycarp.com](mailto:privacy@guycarp.com).

### **How Long Do We Keep Personal Information?**

Our products, services, and regulatory obligations are complex, and thus our retention periods for personal information vary. We consider the following obligations when setting retention periods for personal information and the records we maintain: the need to retain information to accomplish the business purposes or contractual obligations for which it was collected; our duties to effectuate our clients' instructions with respect to personal information we process on their behalf; our duties to comply with mandatory legal and regulatory record-keeping requirements; and other legal impacts such as applicable statute of limitations periods. We may also retain personal information for other purposes delineated in applicable privacy laws.

### **Minors**

We do not knowingly collect personal information from children under 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.

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). However, we never knowingly sell or share 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, requests, complaints, or appeals regarding this Notice or our privacy practices, please contact us at [privacy@guycarp.com](mailto:privacy@guycarp.com).