



JLT EU-US and Swiss-US Privacy Shield Policy

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JLT EU-US AND SWISS – US PRIVACY SHIELD POLICY

JLT entities ("JLT")¹ in the United States ("US") have adopted this Privacy Shield Policy ("Policy") to establish and maintain an adequate level of Personal Data² privacy protection. This Policy applies to the processing of Personal Data that JLT processes in respect of Individual Customers and Employees located in the EU ("EU") and/or Switzerland and/or relating to Individual Customers or Employees where such Personal Data has been sent to JLT from the EU and/or Switzerland.

JLT complies with the US-EU Privacy Shield and the Swiss-US Privacy Shield Frameworks ("Privacy Shield Frameworks") as set forth by the US Department of Commerce regarding the collection, use, and retention of such Personal Data.

JLT has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of notice, choice, accountability for onward transfer, security, data integrity and purpose limitation, access, recourse, enforcement and liability. If there is any conflict between the provisions in this Policy and the Privacy Shield Frameworks'

Principles, the Privacy Shield Frameworks' Privacy Principles shall govern. To learn more about the Privacy Shield program, and to view JLT's certification page, please visit <https://www.privacyshield.gov>.

¹ JLT Holdings Inc. is the parent company of the following JLT US entities: JLT Re (North America) Inc., Weston Preference LLC, RRISS, Jardine Lloyd Thompson Capital Markets, Inc., JLT Towner Insurance Management (USA) LLC, The Towner Management Grp. (NY) LLC, JLT Facilities, Inc., Jardine Lloyd Thompson Insurance Services, Inc., JLT Specialty Insurance Services Inc., JLT Aerospace (North America) Inc., Construction Risk Partners, LLC, Core Risks Ltd. LLC, Gcube Insurance Services, Inc., 1763 Enterprises LLC.

² All capitalized terms are defined in section XIV of this Policy.



Be aware that the Federal Trade Commission (FTC) has jurisdiction over JLT's compliance with the Privacy Shield Frameworks' principles.

All JLT employees who process Personal Data relating to Individual Customers and/or Employees sent from the EU and/or Switzerland are required to comply with the Principles stated in this Policy.

I. SCOPE

This Policy applies to the processing of Individual Customer and Employee Personal Data that JLT receives in the US concerning customers and employees who reside in the EU and/or Switzerland and/or whose Personal Data has been sent to JLT from the EU and/or Switzerland. JLT provides products and services to both businesses and individual consumers.

This Policy does not cover data from which individual persons cannot be identified and where personal data has been converted to a pseudonym and the data needed to identify the Data Subject has not been transferred from the EU and/or Switzerland to the US. (The use of pseudonyms involves the replacement of names or other identifiers with substitutes that are stored separately, so that identification of individual persons is not possible.)

II. COLLECTION AND USE OF PERSONAL DATA

JLT processes Personal Data relating to prospective and actual Individual Customers when they seek to and/or purchase its products, register with JLT's website, login to their JLT account, complete JLT surveys, request information or otherwise communicate with JLT.

JLT processes Personal Data relating to Employees in the course of their employment with JLT or one of JLT's affiliates or subsidiaries.

Individual Customer or Employee Personal Data may include some or all of the following categories:

- Basic personal data including names, addresses, dates of birth
- Identification numbers
- Location data
- Online identifiers
- Factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person
- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Data concerning health
- Data concerning a natural person's sex life or sexual orientation
- Criminal proceedings, outcomes and sentences
- Offenses including alleged offenses
- Education and Training details
- Employment data
- Financial data

The nature of the Personal Data that JLT may process in relation to you will depend upon:

- The nature of your enquiry to JLT
- The nature of the services JLT is seeking to or is providing to you
- Whether you are an Employee or an Individual Customer

For example (this is not an exhaustive list):

- The Personal Data that we collect varies based on the Individual Customer's interaction with our website and request for our services. As a general matter, JLT collects the following types of Personal Data from its Individual Customers: contact information, including a contact person's name, work email address, work mailing address, work telephone number, title, and company name, as well as payment information (which might include credit card and/or bank account information). Individual Customers have the option to log into their JLT accounts online and to request services online, including through a live support option; JLT will collect information that they choose to provide to JLT through these portals.
- When Individual Customers use JLT's services online, we will collect their IP address and browser type. We may associate IP address and browser type with a specific Individual Customer. We also may collect Personal Data from persons who contact us through our website to request additional information; in such a situation, we would collect contact information (as discussed above) and any other information that the person chooses to submit through our website.
- The information that we collect from Individual Customers is used for analyzing products and services, risk, for selling the products and services they buy from us, managing transactions, reporting, invoicing, renewals, and other operations related to providing services and products to the Individual Customer.
- For certain products, JLT serves as a service provider. In our capacity as a service provider, we will receive, store, and/or process Personal Data. In such cases, we are acting as a data processor and will process your Personal Data on behalf of and under the direction of our partners and/or agents. The information

that we collect from our Individual Customers in this capacity is used for managing transactions, reporting, invoicing, renewals, other operations related to providing services to the Individual Customer, and as otherwise requested by our partner and/or agent.

- JLT uses Personal Data that it collects directly from its Individual Customers and for its partners indirectly in its role as a service provider for the following business purposes, without limitation:
 1. Maintaining and supporting its products, delivering and providing the requested products/services, and complying with its contractual obligations related thereto (including managing transactions, reporting, invoices, renewals, and other operations related to providing services to an Individual Customer);
 2. Satisfying governmental reporting, tax, and other requirements (e.g., import/export);
 3. Storing and processing data, including Personal Data, in computer databases and servers located in the US;
 4. Verifying identity (e.g., for online access to accounts);
 5. As requested by the Individual Customer;
 6. For other business-related purposes permitted or required under applicable local law and regulation;
 7. And as otherwise required by law.
- In respect of Employees, JLT processes their Personal Data in order to fulfill our contractual obligations to our staff, and for internal management and/or regulatory reporting, as required.

III. RESPONSIBILITIES AND MANAGEMENT

JLT has designated the Chief Information Officer of the Americas (“CIO”) to oversee its information security and privacy program, including its compliance with the Privacy Shield Frameworks. The CIO shall review and approve any material changes to this Policy as necessary. Any questions, concerns, or comments regarding this Policy should be directed to privacyshield@jltholdings.com.

JLT will identify and manage risks to the privacy and security of the Personal Data that it processes.

All JLT personnel that process Personal Data receive training, as applicable, to effectively implement this Policy.

IV. RENEWAL / VERIFICATION

JLT will renew its US-EU Privacy Shield and US- Swiss Privacy Shield certifications annually, unless it subsequently determines that it no longer needs such certification or if it employs a different mechanism.

Prior to the re-certification, JLT will conduct an in-house verification to ensure that its attestations and assertions with regard to its treatment of Individual Customer and Employee Personal Data are accurate and that the company has appropriately implemented these practices. Specifically, as part of the verification process, JLT will undertake the following:

- A. Review this Policy to ensure that the Policy accurately describes the practices regarding the collection of Individual Customer and Employee Personal Data;

- B. Ensure that the publicly posted Policy informs Individual Customers and Employees of JLT's participation in the Privacy Shield Frameworks and where to obtain a copy of additional information (e.g. a copy of this Policy);
- C. Ensure that this Policy continues to comply with the Privacy Shield Frameworks principles as amended from time to time;
- D. Confirm that Individual Customers and Employees are made aware of the process for addressing complaints in relation to the processing of their Personal Data by JLT and any independent dispute resolution process;
- E. Review JLT's processes and procedures for training Employees to appropriately handle Individual Customer and Employee Personal Data;
- F. Review this Policy annually for needed improvements;
- G. Prepare an internal verification statement on an annual basis for submission to the US Department of Commerce.

V. DISCLOSURES / ONWARD TRANSFERS OF PERSONAL DATA

Except as otherwise provided herein, JLT discloses Personal Data only to Third Parties who reasonably need to know such data and only for the scope of the initial purposes that the Personal Data was provided to JLT and not for any other purposes. Such recipients must agree to abide by and be bound by confidentiality, privacy and security obligations in respect of that Personal Data.

JLT may provide Personal Data to Third Parties that act as agents, consultants, and contractors to perform tasks on behalf of and under JLT's instructions. For example, JLT may store such Personal Data in the facilities operated by Third Parties. Such Third Parties must agree in writing to and must use such Personal Data only for the purposes for which they have been engaged by JLT and they must either:

1. Comply with the Privacy Shield principles or another mechanism permitted by the applicable EU & Swiss data protection law(s) for transfers and processing of Personal Data; or
2. Agree to provide adequate protections for the Personal Data that are no less protective than those set out in this Policy.

JLT also may disclose Personal Data for other purposes or to other Third Parties when a Data Subject has consented to or requested such disclosure.

Be aware that JLT may be required to disclose an individual's Personal Data in response to a lawful request by public authorities in the US, EU or Switzerland, including meeting national security or law enforcement requirements.

In cases of onward transfer to Third Parties of data of EU and Swiss Individual Customers or Employees, received pursuant to the Privacy Shield, JLT may be liable (if responsible for the event giving rise to the damage).

VI. SENSITIVE DATA

JLT processes certain Sensitive Data in respect of both Individual Customers and Employees with particular reference to medical and health related data. For example, JLT will process Individual Customer health related data when processing medical insurance claims. Likewise, as a duty of care to JLT Employees, JLT will process certain medical related data of Employees.

VII. DATA INTEGRITY

JLT uses reasonable efforts to maintain the accuracy and integrity of Personal Data. JLT has defined Data Protection and Information Security policies that outline the minimum measures necessary from a people, process, physical, and technical

security perspective to protect Personal Data from loss, misuse, unauthorized access/disclosure, alteration and destruction. For example, electronically stored Personal Data is stored on a secure network with firewall protection, and access to JLT's electronic information systems requires user authentication via password or similar means. JLT also employs access restrictions, limiting the scope of employees who have access to Individual Customer and Employee Personal Data only to those with a need to know.

Despite these precautions, please be aware that no data security safeguards guarantee 100% security all of the time.

VIII. NOTIFICATION

JLT notifies Individual Customers and Employees about its adherence to the US-EU Privacy Shield and the Swiss - US Privacy Shield principles through JLT's publicly posted website privacy policy, available at: <http://www.usa.jlt.com/data-protection>.

IX. ACCESSING PERSONAL DATA

JLT employees may access and use Personal Data only if they are authorized to do so and only for the purpose for which they are authorized.

X. RIGHT TO ACCESS, CHANGE OR DELETE PERSONAL DATA

A. Right to Access.

- a. Individual Customers and Employees have the right to know what Personal Data is being stored and processed about them by JLT and to ensure that such Personal Data is accurate and relevant for the purposes for which JLT is authorized to process it.

- b. Individual Customers and Employees have the right to require JLT to correct, erase, limit, or block any of their Personal Data if it is inaccurate or is processed in violation of the Privacy Shield Frameworks principles.
- c. Upon reasonable request and as required by the Privacy Shield Frameworks principles, JLT allows Individual Customers and Employees access to their Personal Data, in order to correct or amend such data where it is inaccurate.
- d. In rare circumstances, the right to access Personal Data may be restricted where the legitimate rights of individuals (other than the requesting Individual Customer or Employee) would be violated, or where the burden or expense of providing the access to the Personal Data would be disproportionate to the risks to the individual's privacy in the case in question, or where confidential commercial information cannot be readily separated from the Personal Data.
- e. In instances where employment information is requested, the above restrictions may or may not be applicable depending on the originating jurisdiction of the Personal Data and JLT will provide information through the applicable local office either in the EU or Switzerland, in accordance with JLT internal HR policies and procedures.
- f. To request access, modification or erasure of Personal Data, Individual Customers and Employees should submit a written request to the following address: privacyshield@jltholdings.com.

B. Requests for Personal Data. JLT will track each of the following and will provide notice to the appropriate parties under law and contract when either of the following circumstances arise:

- a. Legally binding request for disclosure of the Personal Data by a law enforcement authority; or

b. Requests received from an Individual Customer or Employee.

C. **Satisfying Requests for Access, Modifications, and Corrections.** JLT will endeavor to respond in a timely manner to all reasonable written requests to view, modify, or block Personal Data. Individuals will be required to provide sufficient information to JLT to confirm the identity of the person making the request. Additionally, individuals should be aware that in some instances a fee to access the Personal Data may be justified when the request is manifestly excessive.

XI. CHANGES TO THIS POLICY

This Policy may be amended from time-to-time, consistent with the Privacy Shield Framework's principles and applicable data protection and privacy laws and principles. We will make JLT Employees aware of changes to this policy either by posting to our intranet, through email, or other means. We will notify Individual Customers directly if we make changes that materially affect the way we handle Personal Data previously collected, and we will allow them to choose whether their Personal Data may be used in any materially different manner.

XII. QUESTIONS OR COMPLAINTS

Individual Customers and Employees falling under the scope of the Privacy Shield Framework may contact JLT with questions or complaints concerning this Policy at the following address: privacyshield@jltholdings.com.

XIII. ENFORCEMENT AND DISPUTE RESOLUTION

In compliance with the US-EU and US-Swiss Privacy Shield Principles, JLT commits to resolve complaints about your privacy and our collection /processing of Personal Data. EU and Swiss Individual Customers or Employees with questions or concerns

about the use of their Personal Data should contact us at: privacyshield@jltholdings.com.

Complaints That Cannot Be Resolved:

Individual Customers and Employees have the option, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. For additional information regarding the complaint resolution requirements, please refer to <https://www.privacyshield.gov/article?id=ANNEX-I-introduction> for the EU-US Privacy Shield requirements and <http://trade.gov/td/services/odsi/swiss-us-privacyshield-framework.pdf> for the Swiss-US Privacy Shield requirements.

Individual Customers:

If an Individual Customer's question or concern cannot be satisfied by contacting JLT's Privacy Shield response team within forty-five (45) days of receiving the complaint, JLT has committed to refer unresolved privacy complaints to the American Arbitration Association ("AAA"), an alternative dispute resolution provider located in the US, as applicable. The services of the AAA will be provided to you at no cost. Information about how to file a complaint before the AAA EU Privacy Shield program can be found at <http://info.adr.org/safeharbor>.

Employee:

If an Employee's question or concern cannot be satisfied after forty-five (45) days, JLT commits to cooperate with the panel established by the EU data protection authorities (DPAs) and/or the Swiss Federal Data Protection and Information Commissioner, as applicable and comply with the advice given by the DPAs and/or Commissioner, as applicable, with regard to Employee human resources Personal Data transferred from the EU and/or Switzerland, as applicable, in the context of the employment relationship.

Finally, as a last resort and in limited situations, EU individuals may seek redress from the Privacy Shield Panel, a binding arbitration mechanism.

JLT commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner, as applicable and comply with the advice given by such authorities with regard to human resources data transferred from the EU or Switzerland in the context of the employment relationship.

XIV DEFINED TERMS

Capitalized terms in this Privacy Policy have the following meanings:

"Individual Customer" means an individual customer or client of JLT whose Personal Data has been sent to JLT from either or both of the EU or Switzerland. The term also shall include any individual agent, representative, of an Individual Customer of JLT where JLT has obtained his or her Personal Data from such Individual Customer as part of its business relationship with JLT.

"Data Subject" means an identified or identifiable natural living person. An identifiable person is one who can be identified, directly or indirectly, by reference to a name, or to one or more factors unique to his or her personal physical, psychological, mental, economic, cultural or social characteristics. For Individual Customers residing in Switzerland, a Data Subject also may include a legal entity.

"Employee", for purposes of this policy, means an employee whether temporary, permanent or part-time, or full-time, former employee, or job applicant of JLT or any of its affiliates or subsidiaries, who is a resident of a country within the EU or Switzerland or whose Personal Data has been sent to JLT from the EU or Switzerland.

"Europe" or "European" refers to a country in the EU.

"Personal Data" as defined under the EU Directive 95/46/EC means data that personally identifies or may be used to personally identify a person, including an individual's name in combination with country of birth, marital status, emergency contact, salary information, terms of employment, job qualifications (such as educational degrees earned), address, phone number, e-mail address, user ID, password, and identification numbers. Personal Data does not include data that is de-identified, anonymous, or publicly available. For Switzerland, the term "person" includes both a natural person and a legal entity, regardless of the form of the legal entity.

"Sensitive Data" means Personal Data that discloses a Data Subject's medical or health condition, race or ethnicity, political, religious or philosophical affiliations or opinions, sexual orientation, or trade union membership. For Switzerland additionally this means any information on social security measures or administrative or criminal proceedings and sanctions, which are treated outside pending proceedings.

"Third Party" means any individual or entity that is neither JLT nor a JLT employee, agent, contractor, or representative.

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ABOUT JLT

JLT Specialty USA is the US platform of the leading specialty business advisory firm, Jardine Lloyd Thompson Group. Our experts have deep industry and product experience serving leading US and global firms. Our key to client success is our freedom to be creative, collaborative, and analytical while challenging conventions, redefining problems, creating new insights, and exploring new options to deliver solutions for each client's unique business and risks.

JLT is one of the world's leading providers of insurance, reinsurance and employee benefits related advice, brokerage and associated services. We are specialists. Our deep expertise and entrepreneurial culture give us the insights, creative freedom and tenacity to go beyond the routine and deliver better results for our clients. At JLT, clients come first. JLT owns offices in 40 territories and has more than 10,000 colleagues. Supported by the JLT International Network, we service clients in over 135 countries.

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