



JARDINE LLOYD THOMPSON GROUP PLC WEBSITE PRIVACY NOTICE

This privacy notice sets out how Jardine Lloyd Thompson Group plc collects and processes information about you through your use of this website. Do read this Notice with care. It provides important information about how we use personal data and explains your legal rights. This Notice is not intended to override our other privacy policies or fair processing notices or contract you have with us or any rights you might have available under applicable data protection laws. We may amend this Notice from time to time for example, to keep it up to date or to comply with legal requirements or changes in the way we operate our business. Please regularly check this Notice for updates.

1. **Who is responsible for looking after your personal data?**

Jardine Lloyd Thompson Group plc ("**we**", "**us**" or "**our**") operates this website and accordingly is the **Controller** and is responsible for looking after your personal data.

2. **What personal data are we collecting?**

We may collect, use, store and transfer the following personal data from you:

- **Contact Details** which includes names, email addresses and telephone numbers;
- **Technical Data** which includes internet protocol (IP) addresses, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website; and
- **Usage Data** which includes information about how you use our website.

Please note that we do not collect any Special Categories of Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We also do not collect any information about criminal convictions and offences.

This website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3. **How do we use your personal data?**

We will only use your information when the law allows us to. We usually use your information for the following purposes:

- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- where we are required to comply with a legal or regulatory obligation or requirement.

We have set out below a description of the ways in which we may use your personal data and which of the legal bases we rely on to do so.

Activity	Type of information collected	The basis on which we may the information
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Contact Details Technical Data Usage Data	Legitimate interests (for the provision of administration and IT services, network security, to prevent fraud) To comply with a legal obligation
To deliver relevant website content and to measure the effectiveness and interest in our website content	Contact Details Technical Data Usage Data	Legitimate interests (to analyse how clients and prospective clients use our services, to develop them and to grow our business and to inform our business development strategy)
To use data analytics to improve our website and customer experience	Technical Data Usage Data	Legitimate interests (to keep our website updated and relevant, to develop our business and to inform our business development strategy, to ensure we are targeting the intended audience)

To make suggestions and recommendations to you about our services that may be of interest to you	Contact Details Usage Data	Legitimate interests (to develop our services and inform our business development strategy)
--	-------------------------------	---

4. How is your personal data collected?

We may collect data from and about you through the following:

- **Automated technologies or interactions** where we may automatically collect Technical Data about your equipment, browsing actions and patterns as you interact with the website. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources** which may include the receipt of Technical Data from analytics providers such as Google based both inside and outside the EU.

5. Who do we share your personal data with?

We work with many third parties to help administer, maintain and provide the website. These third parties may from time to time need to have access to personal data and may include:

- **Service providers** such as those who help manage our IT and back office systems and processes and those who help maintain and manage our website; and
- **our regulators** which may include the Information Commissioner’s Office, the Financial Conduct Authority as well as other regulators and law enforcement agencies in the E.U. and around the world.

6. International Transfers

From time to time we may need to share your personal data with other affiliate companies of the Jardine Lloyd Thompson Group plc who may be based outside of the European Economic Area ("EEA"). We may also transfer your personal data to our service providers or to regulators, who may be located outside the EEA. We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests:

- we will only transfer your personal data to countries which are recognised as providing an adequate level of legal protection,
- transfers within the affiliate companies of Jardine Lloyd Thompson Group plc who will be covered by the Standard Contractual Clauses which gives specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within affiliate companies of Jardine Lloyd Thompson Group plc,
- transfers to service providers and other third parties will always be protected by contractual commitments and where appropriate further assurances, such as the Standard Contractual Clauses or certification schemes - for example, the EU - U.S. Privacy Shield for the protection of personal data transferred to the US.

7. How long do we keep your personal data?

We will retain your personal data for as long as is reasonably necessary for the purposes set out in this Notice. In some circumstances we may retain your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax or accounting requirements.

In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

Where your personal data is no longer required we will ensure it is either securely deleted or stored in a way which means it will no longer be used by the business.

8. What are your rights?

You have a number of rights in relation to your personal data.

You may request access to your data, correction of any mistakes in our files, erasure of records where no longer required, restriction on the processing of your data, objection to the processing of your data, data portability and various information in relation to any Automated Decision Making and Profiling or the basis for international transfers. You may also exercise a right to complain to your Supervisory Authority. These are set out in more detail as follows:

RIGHT	WHAT THIS MEANS
Access	<p>You can ask us to:</p> <ul style="list-style-type: none"> confirm whether we are processing your personal data; give you a copy of that data; provide you with other information about your personal data such as what data we have, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Automated Decision Making or <u>Profiling</u>, to the extent that information has not already been provided to you in this Notice.
Rectification	<p>You can ask us to rectify inaccurate personal data. We may seek to verify the accuracy of the data before rectifying it.</p>
Erasure	<p>You can ask us to erase your personal data, but only where:</p> <ul style="list-style-type: none"> it is no longer needed for the purposes for which it was collected; or you have withdrawn your consent (where the data processing was based on consent); or following a successful right to object (see 'Objection' below); or it has been processed unlawfully; or to comply with a legal obligation to which we are subject. <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary:</p> <ul style="list-style-type: none"> for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims. <p>There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances where we would deny that request.</p>
Restriction	<p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <ul style="list-style-type: none"> its accuracy is contested (see Rectification), to allow us to verify its accuracy; or the processing is unlawful, but you do not want it erased; or it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or you have exercised the right to object, and verification of overriding grounds is pending. <p>We can continue to use your personal data following a request for restriction, where:</p> <ul style="list-style-type: none"> we have your consent (for example to process a claim); or to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person; or to comply with a legal obligations to which we are subject.
Portability	<p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Controller, but in each case only where:</p> <ul style="list-style-type: none"> the processing is based on your consent or the performance of a contract with you; and the processing is carried out by automated means.
Objection	<p>You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis (see Section 3) if you believe your fundamental rights and freedoms outweigh our legitimate interests.</p> <p>Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.</p>
International Transfers	<p>You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area. We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.</p>
Supervisory Authority	<p>You have a right to lodge a complaint with your local Supervisory Authority about our processing of your personal data. In the UK, the Supervisory Authority for data protection is the ICO</p>

RIGHT	WHAT THIS MEANS
	(https://ico.org.uk/) . We do ask that you please attempt to resolve any issues with us first, although you have a right to contact your Supervisory Authority at any time.

To exercise your rights you may contact us as set out in Section 9. Please note the following if you do wish to exercise these rights:

- **Identity.** We take the confidentiality of all records containing personal data seriously, and reserve the right to ask you for proof of your identity if you make a request.
- **Fees.** We will not ask for a fee to exercise any of your rights in relation to your personal data, unless your request for access to information is unfounded, repetitive or excessive, in which case we will charge a reasonable amount in the circumstances. We will let you know of any charges before completing your request.
- **Timescales.** We aim to respond to any valid requests within one month unless it is particularly complicated or you have made several requests, in which case we aim to respond within three months. We will let you know if we are going to take longer than one month. We might ask you if you can help by telling us what exactly you want to receive or are concerned about. This will help us to action your request more quickly.
- **Exemptions.** Local laws, including in the UK, provide for additional exemptions, in particular to the right of access, whereby personal data can be withheld from you in certain circumstances, for example where it is subject to legal privilege.
- **Third Party Rights.** We do not have to comply with a request where it would adversely affect the rights and freedoms of other data subjects.

9. Contact and complaints

The primary point of contact for all issues arising from this Notice, including requests to exercise data subject rights, is our Website Data Protection Officer. The Website Data Protection Officer can be contacted in the following ways:

JLTGroup_WebDPO@JLTGroup.com

Data Protection Officer
 JLT Group plc
 The St Botolph Building
 138 Houndsditch
 London
 EC3A 7AW

If you have a complaint or concern about how we use your personal data, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have a right to lodge a complaint with your national data protection supervisory authority at any time.