

# We protect your personal information

Your employer is cooperating with Aon to give you the best possible insurance and pension arrangements. In this regard, Aon may be processing personal information about you which we will get either from your employer, an insurance company/pension provider or you. It is very important for us to protect and respect your privacy. This letter gives you information about what we do to process your personal information safely and securely.1 This applies both to employees of our new clients as well as employees of existing clients, about whom we are already processing personal data.

#### What is personal information?

Personal information is any type of information or assessment that will identify you as an individual. Examples of personal information are name, address, telephone number, birth date/personal number, employee number, position, financial information, license registration number, photographs, and IP address.

#### Data controller

Aon Norway AS is responsible, or controller, of personal data in relation to the services granted by us as a pension and insurance advisor and broker. This means that we collect, store, process, delete and if necessary disclose your personal information to a third party such as your employer or an insurance company/pension provider, in order for us to give the best possible advice and service to you and/or your employer.

### What types of personal information do we process?

Aon may collect and process the following data depending on the agreement we have with your employer:

- With regard to pension arrangements and personal insurances (insurances connected to you as a person) arranged by your employer we may process the following personal information about you: Name, position, address, phone number, email, birth date, personal ID number, salary and other compensation, family relations, financial information, license registration number, and travel information.
- With regard to all other risk insurances connected to your employer we may process the following
  personal information about the person that is our contact person in your employer company: Name,
  position and contact details.

We may also process sensitive personal information with your consent, for example health information in connection with claims assistance or trade union membership information in connection with certain pension arrangements. You may at any time revoke your consent, however, it will not affect the legality of processing carried out prior to the revocation. We do not deliberately collect personal information from children below the age of 18 without the consent of the person with parental responsibility or a guardian.

You have the right to receive information about our processing of your personal data in accordance with the Norwegian Personal Data Act and article 14 of the EU Data Protection Regulation 2016/679 (GDPR)



### Purpose and legal basis of the processing

The personal information we collect is used to enable us to give you and/or your employer the best possible advice in relation to insurance and pension. Furthermore, we store data which we are obliged to store according to applicable law, for example the Book-keeping Act and the Anti-Money Laundering Act, or to document the services we have given and protect Aon against legal claims. In some cases we may use the data to perform calculations for accounting purposes for your employer. We will not use your information for marketing purposes without your consent.

Aon's legal basis for processing your personal information is

- Your consent (if the information that we will process is sensitive personal information)
- Our legitimate interest in fulfilling our agreement with your employer
- Our obligations pursuant to applicable law

#### Disclosing personal information to third parties

Correct handling of your personal information is very important to Aon. We will not sell, publish or in any way disclose your data to a third party without your consent, unless it is necessary to fulfil an agreement with you or your employer or to ensure compliance with applicable law. We will not use your personal information for any other purpose than those described in this document.

It may be necessary for us to disclose your data to selected and trusted cooperating partners in order to be able to provide you and/or your employer with our service and advice. We may for example disclose data to cooperating partners who are entitled to use your personal information for the purpose of establishing or adjusting pension and insurance schemes that you are member of/covered by.

It is our responsibility to ensure that your personal information is not misused. We therefore place heavy demands on our partners when your personal information is processed outside Aon. We always demand and ensure that our partners guarantee that your personal information is duly protected.

In connection with IT development, hosting and support, personal information may be transferred to data processors who process data on Aon's behalf. Some data processors are established in countries outside the EU and the EEA, for example the United Kingdom, the USA, Singapore, India and the Philippines. We use a number of legal mechanisms, including standard contracts approved by the EU Commission or the Norwegian Data Protection Authority and the EU-US PrivacyShield, to ensure that your rights and the protection level according to the law are observed.

If you want more information about the processing of your data outside the EU/EEA, you are welcome to contact us using the e-mail address below. Here you can ask for additional information about the security measures we have taken to ensure that your personal information is processed appropriately and correctly if we disclose it to countries outside the EU/EAA – among other things you can get information about the contractual stipulations regulating the data transfer.

## Storing of personal information in Aon

Aon stores your personal information while your employer is our customer and for as long as it is necessary for us to document our advice given in relation to your and your employer's insurance and pension



arrangements. We also store and use your information if it is necessary for us to observe legal obligations and to enforce our agreements.

Aon is obliged to protect your personal information. We use technical and organisational measures to protect ourselves against unauthorised access and use, and destruction of, changes to or publication of your personal information on the part of any individual or organisation. For the same reason, only a limited number of Aon employees with objective need have access to your personal information.

To secure your personal information, we have adopted internal rules on information security including both instructions and measures to protect your data against being destroyed, lost or changed and against unauthorised persons getting access to or knowledge of it. Furthermore, all Aon employees must observe internal procedures and rules regarding the handling of personal information and are regularly trained in correct handling of personal information.

### Deleting personal information

We will delete your personal information when your employer is no longer Aon's customer and we no longer need to document the advice we have given. However, Aon may also be required by applicable law to keep certain information for a longer period of time. For example identity and transaction information which shall be kept for at least five years pursuant to the Anti-Money Laundering Act. The same applies to certain information under the Book-keeping Act. We will also keep information as long as necessary in order to be able to document the advice we have provided.

### Your rights

Since you are covered by, or contact person for, your employer's insurances or pensions arranged via Aon you can upon request get information about the personal information about you which we have processed, their origin and how we use it. You may also get information about how long we store your data and who will receive information about you to the extent that we disclose data in Norway and abroad. The access may, however, be restricted considering the protection of other people's privacy, business secrets and intellectual property rights.

If the personal information is incorrect, incomplete or irrelevant, you are entitled to have the data corrected or deleted. You are also entitled to object to our processing. If your objection is justified, we will stop processing your personal information. As our services depends on correct and updated personal information, we will be grateful if you will inform us of relevant changes to your data.

## How to get more information

If you want more information or if you want to change or delete your personal information, you are welcome to contact our Data Protection Officer (DPO). You can either write to **Aon Norway AS**, Attn: Personvernombud, P. O. Box 1503 Vika, 0117 Oslo, or send an email to personvern @aon.no.

You may also complain about Aon's processing of your personal information. Your complaint should be sent to: **Datatilsynet**, P.O. Box 8177, 0034 Oslo, 22 39 69 00, e-mail: postkasse@datatilsynet.no.

Read more about Aon's privacy policy, including any updates on how we process personal information at <a href="https://www.aon.com/norway/om-aon/personvern">www.aon.com/norway/om-aon/personvern</a>

