

## SIP SITE - PRIVACY POLICY

This Privacy Policy covers the information practices of websites that link to this Privacy Policy (each referred to as a "Site"). The data controller of this website, <https://www.sipinsurance.eu>, is Marsh N.V./S.A. ("Marsh") with registered office at Avenue Herrmann-Debroux/Herrmann-Debrouxlaan, 2, BE-1160 Brussels (Belgium) (Crossroads Bank of Enterprises Brussels n° 0402 276 906). Marsh is authorized and regulated by the Financial Services and Markets Authority (FSMA n° 014192 AR).

Marsh believes strongly in protecting your privacy and the confidentiality of your Personal Information. We acknowledge that you may have privacy and security concerns with respect to the information we collect, use, and disclose to third parties for the purpose of allowing us to offer and provide our products and services to you. In order to comply with Belgian privacy legislation, we have developed this Privacy Policy. Personal information is any combination of information, collected on or through this Site by Marsh, that can be used to identify, contact, or locate an individual ("Personal Information") and will be treated in accordance with this Privacy Policy. This includes any expression of opinion about such individual. Any information which cannot be used to identify an individual (such as aggregated statistical information) is not Personal Information.

This Privacy Policy is subject to the Website Terms of Use [Website Terms of Use](#).

By using this Site you consent to the use, storage and processing of your personal information and other information stored on this Site or submitted by you on or through this Site in accordance with this Privacy Policy as set out in detail below.

## PURPOSE FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Marsh collects, uses and discloses your Personal Information (including individuals associated with you, all of whom are referred to as "you" in this Privacy Policy) in its normal course of business for the following purposes:

- establishing and maintaining communications with you;
- where you have requested a service from Marsh, assisting you in the completion of your application, the assessment of your eligibility for any such requested service, the processing and maintenance of the service, as well as any applicable renewal of such service;
- responding to your inquiries about applications, accounts and other services;
- allowing our affiliated companies to notify you, as permitted by law, of certain products or services offered by our affiliated companies;
- where we outsource any function, processing transactions through service providers;
- sharing with associations for those clients/participants obtaining insurance coverage by being a member of the association;
- sharing with financial institutions and other organizations where we have joint marketing agreements as permitted by law;
- meeting legal, security, processing and regulatory requirements;
- protecting against fraud, suspicious or other illegal activities; and
- compiling statistics for analysis of our sites and our business.

## WHAT INFORMATION WE COLLECT

The information gathered by Marsh from this Site falls into two categories: (1) information voluntarily supplied by visitors to our Site and (2) tracking information gathered as visitors navigate through our Site.

## **(1) Information voluntarily provided by you**

When using this Site, you may choose to provide us with information to help us serve your needs. The Personal Information that we collect will depend on how you choose to use this Site.

- **Where you request a brochure or report**

If you request a brochure or report or further information from us, we require you to submit your name, e-mail address, the name of your organization, and the country in which you are based so we may send you the material you have requested, and to enable us to identify if you are an existing client of Marsh.

- **Where you register with us and/or request an insurance quote**

If you register with the Site, or request an insurance quote, we may ask you for your name, e-mail address, country, telephone number and the reason for your communication, as well as information about your position and organization and such other information as is reasonably necessary so that we can provide you with a quote. When registering with the Site or requesting an insurance quote, the relevant data submission form shall indicate by way of an asterisk which information is optional and which information is mandatory

Following the quote, if you decide to proceed, we will collect Personal Information necessary to finalize the relevant quote and proceed with the transaction, such as your name, address, post code, contact telephone number, e-mail address, billing address or payment details, as relevant to the product. We will use your Personal Information to administer your policy, process claims etc. and generally manage your relationship with us. To finalize the relevant quote we will need to disclose your Personal Information to those recipients detailed in the [Disclosure of Your Information](#) section of this Privacy where you submit content

Finally, if you submit content regarding any of the information that you view on our Site, we will ask for your name and e-mail address, so that, if you choose, we can update you by e-mail when others also comment on the content, and also so that we can manage the content in line with our [Website Terms of Use](#). You should be aware that the information you provide there will be made publically available to Marsh employees and other users of the Site.

## **(2) Website Navigational Information**

As you navigate the Site, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and web beacons (collectively "Website Navigational Information"). Website Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Site (such as the web pages viewed and the links clicked).

- **Cookies**

Like many companies, we may use cookies on this Site. Cookies are pieces of information shared between your web browser and a website. Use of cookies enables a faster and easier experience for the user. A cookie cannot read data off your computer's hard drive.

(1) There are different kinds of cookies with different functions:

- (i) **Session cookies:** these are only stored on your computer during your web session. They are automatically deleted when the browser is closed. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page. They do not collect any information from your computer.
- (ii) **Persistent cookies:** a persistent cookie is one stored as a file on your computer, and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.
- (iii) **First-party cookies:** the function of this type of cookie is to retain your preferences for a particular website for the entity that owns that website. They are stored and sent

between Marsh's servers and your computer's hard drive. They are not used for anything other than for personalization as set by you. These cookies may be either Session or Persistent cookies.

(iv) Third-party cookies: the function of this type of cookie is to retain your interaction with a particular website for an entity that does not own that website. They are stored and sent between the Third-party's server and your computer's hard drive. These cookies are usually Persistent cookies.

Except as described in this Privacy Policy, we do not use third-party cookies on our Sites, although we do use third party provided web beacons (please see the section on Web Beacons below).

This Site does use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity, and providing other services relating to website activity and internet usage for Marsh and its affiliates. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The major browsers have attempted to implement the draft "Do Not Track" ("DNT") standard of the World Wide Web Consortium ("W3C") in their latest releases. As this standard has not been finalized, Marsh's Sites are not compatible with DNT.

For information on all of these categories of cookies, and for more information generally on cookies please refer to [aboutcookies.org](http://aboutcookies.org) [aboutcookies.org](http://aboutcookies.org).

(2) We use cookies for the following purposes:

#### **Where strictly necessary**

These cookies are essential in order to enable you to move around the Site and use its features, such as accessing secure areas of the Site. Without these cookies, services you have asked for, such as obtaining a quote or logging into your account, cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

#### **Performance**

These cookies collect information about how visitors use a Site, for instance which pages visitors go to most often, and if they get error messages from web pages. They also allow us to record and count the number of visitors to the Site, all of which enables us to see how visitors use the Site in order to improve the way that our Site works. These cookies do not collect information that identifies a person, as all information these cookies collect is anonymous and is used to improve how our Site works.

#### **Functionality**

These cookies allow our Site to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, a Site may be able to remember your log in details, so that you do not have to repeatedly sign in to your account when using a particular device to access our Site. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customize. They may also be used to provide services you have requested such as viewing a video or commenting on an article. The information these cookies

collect is usually anonymized. They do not gather any information about you that could be used for advertising or remember where you have been on the internet.

Please consult your web browser's 'Help' documentation or visit [aboutcookies.org](http://aboutcookies.org) [aboutcookies.org](http://aboutcookies.org) for more information about how to turn cookies on and off for your browser.

- **Web Beacons**

The Site may also use web beacons (including web beacons supplied or provided by third parties) alone or in conjunction with cookies to compile information about users' usage of the Site and interaction with e-mails from Marsh. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Site tied to the web beacon, and a description of a Site tied to the web beacon. We use web beacons to operate and improve the Sites and e-mail communications. We may use information from web beacons in combination with other data we have about our clients to provide you with information about Marsh and our services. We will conduct this review on an anonymous basis.

- **IP Addresses**

When you visit our Sites, Marsh collects your Internet Protocol ("IP") addresses to track and aggregate non-Personal Information. For example, Marsh uses IP addresses to monitor the regions from which users navigate the Sites. IP addresses will be stored in such a way so that you cannot be identified from the IP address.

## DISCLOSURE OF INFORMATION TO OTHERS

We do not disclose any Personal Information about you to any third parties except as stated in this Privacy Policy, as otherwise permitted by law, or authorized by you.

Third parties to whom we disclose information are required by law and contractual undertakings to keep your Personal Information confidential and secure, and to use and disclose it for purposes that a reasonable person would consider appropriate in the circumstances, in compliance with all applicable legislation. Such purposes for which a third party will disclose information are as follows:

- to assess eligibility for coverage, process and maintain insurance coverage, renewal of coverage or related products and services—we disclose to the insurance companies, reinsurers, intermediaries or other brokers that make available the coverage;
- to associations for those Clients/Participants obtaining insurance coverage by being a member of the association;
- to notify you or allow our affiliated companies to notify you of certain products or services offered by our affiliated companies;
- for legal, claims settlement and valuation services;
- to update information with credit bureaus and insurance reporting agencies;
- to process transactions through data processing service providers;

If these third parties wish to use your Personal Information for any other purpose, they will have a legal obligation to notify you of this and, where required, to obtain your consent. Contact us on <http://belgium.marsh.com/Contacteznous.aspx> or on [sip@marsh.com](mailto:sip@marsh.com) for more information on these third parties.

### Affiliate Sharing

In the normal course of performing services for our clients, Personal Information may be shared within Marsh and its affiliates for research and statistical purposes, system administration and crime prevention or detection. This may require Personal Information to be accessed or moved to a country different from the one where the Personal Information was collected. 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 general insurance and other services for you on the

understanding that the individuals to whom the Personal Information relates have been informed of the reason(s) for obtaining the Personal Information, the fact that it may be disclosed to third parties such as Marsh, and have consented to such disclosure and use.

### **Business Transactions**

As we continue to develop our business, we might sell or buy assets. In such transactions, user information, including Personal Information, generally is one of the transferred business assets. Also, if either Marsh itself or substantially all of Marsh assets were acquired, your Personal Information may be one of the transferred assets. Therefore, we may disclose and/or transfer your Personal Information to a third party purchaser in these circumstances

### **Other Legally Required Disclosures**

Marsh preserves the right to disclose without your prior permission, where permitted by law, any Personal Information about you or your use of this Site if Marsh has a good faith belief that such action is necessary to: (a) protect and defend the rights, property or safety of Marsh, employees, other users of this Site, or the public; (b) enforce the terms and conditions that apply to use of this Site; (c) as required by a legally valid request from a legal or regulatory body or a governmental authority; or (d) respond to claims that any content violates the rights of third-parties. We may also disclose Personal Information as we deem necessary to satisfy any applicable law, regulation, legal process or governmental request

In this Privacy Policy, the purposes identified above and in "Collection, Use and Disclosure of Personal Information" will be referred to as the "Identified Purposes."

### **Transferring information overseas**

Your personal information may be transferred to any country, including countries outside the European Economic Area ("EEA"), which do not have as robust a data protection regime as those countries within the EEA, to achieve any of the purposes stated above and for systems administration. Marsh has offices in more than 100 countries around the world, please refer to the list of our group companies to whom we may transfer your personal information. It is possible that your details or personal information collected may be passed to these.

Personal information collected through this Site is processed and stored in the United States. Marsh's web hosting supplier complies with the EU Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union. Where a recipient is not Safe Harbor self-certified, we shall ensure that your personal information is adequately protected using other measures.

If you submit any personal information relating to another person on or through the Site to Marsh and such personal information is protected by another state or country, you will be responsible for compliance with the applicable laws in so far as they relate to your right to use such personal information, your transfer of it to Marsh, Marsh's storage of that personal information in electronic form on the Site and use of that personal information in performing brokerage and other services for your organization in accordance with this Privacy Policy.

### **CONSENT**

Your knowledge of and consent to Marsh's collection, use and disclosure of your Personal Information is critical. We rely on the following actions by you as indications of your consent to our existing and future Personal Information practices:

- Your voluntary provision of Personal Information to us directly or through another insurance broker or representative or your employer for the purpose of acquiring an insurance contract or related service or product (including information previously provided to Marsh);
- Your express consent or acknowledgement contained within a written, verbal or electronic application or claims process; and
- Your verbal consent solicited by Marsh (or our agent) for a specified purpose.

Where Marsh relies on consent for the fair and lawful processing of Personal Information, the opportunity to consent will be provided when the Personal Information in question is collected. Your consent may be given through your authorized representative such as a legal guardian, agent or holder of a power of attorney.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw this consent at any time. Marsh will inform you of the consequences of withdrawing your consent. **In some cases, refusing to provide certain Personal Information or withdrawing consent for Marsh to collect, use or disclose your Personal Information could mean that we cannot obtain insurance coverage or other requested products, services or information for you.**

**If you wish to withdraw your consent please refer to the Questions or to Withdraw Consent section below.**

**However**, there are a number of instances where Marsh does not require your consent to engage in the processing or disclosure of Personal Information. Marsh may not solicit your consent for the processing or transfer of Personal information for those purposes which have a statutory basis, such as:

- The transfer or processing is necessary for the performance of a contract between you and Marsh (or one of its affiliates);
- The transfer or processing is necessary for the performance of a contract, concluded in your interest, between Marsh (or one of its affiliates) and a third party;
- The transfer or processing is necessary, or legally required, on important public interest grounds, for the establishment, exercise, or defense of legal claims, or to protect your vital interests; or
- The transfer or processing is required by applicable law.

## YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at <http://belgium.marsh.com/Contacteznous.aspx> or at [sjp@marsh.com](mailto:sjp@marsh.com).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

The Belgian Data Protection Act (the "Act") gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of 10 EUR to meet our costs in providing you with details of the information we hold about you. To access information held about you by us please contact:

The Compliance Officer

Marsh N.V./S.A.

Avenue Herrmann-Debroux/Herrmann-Debrouxlaan, 2

BE- 1160 Brussels

Belgium

## LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION

Marsh will collect, use, or disclose Personal Information that is necessary for the Identified Purposes or as permitted by law. If we require Personal Information for any other purpose, you will be notified of the new purpose, and subject to your consent (where appropriate), that new purpose will become an Identified Purpose.

Marsh will collect Personal Information by fair and lawful means. We will normally retain Personal Information as long as necessary for the fulfillment of the Identified Purposes. However, some Personal Information may be retained for longer periods as required by law, contract, or auditing requirements.

## SAFEGUARDS

We have in place physical, electronic and procedural safeguards appropriate to the sensitivity of the information we maintain regarding Clients and Participants. Safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Information. They include physical, technical, and managerial measures to keep Personal Information protected from unauthorized access. Among such safeguards are the encryption of communications via SSL, encryption of information while it is in storage, firewalls, access controls, separation of duties, and similar security protocols. However, due to the nature of the Internet and related technology, we cannot absolutely guarantee the security of Personal Information, and Marsh expressly disclaims any such obligation.

## INFORMATION RELATED TO EMPLOYMENT

This Site may provide an opportunity to submit your curriculum vitae or your unsolicited application or to apply for a position or an internship through this Site by completing the online application form. If you submit information for such purposes, we will use (which may include transferring outside the EEA) the personal information you provide to evaluate your qualifications and contact you regarding any positions at Marsh or any of its affiliated companies in which we believe you may be interested.

## EXTERNAL LINKS

Marsh Sites may include links to other websites whose privacy policies we do not control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your web browser), use of any Personal Information you provide is governed by the privacy policy of the operator of the website you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these websites via a link from the website's homepage, you should contact the website directly for more information.

## ACCURACY, ACCOUNTABILITY, OPENNESS AND CUSTOMER ACCESS

Our knowing about changes to some of your Personal Information (e.g. email address) may be key to effectively communicating with you at your request. If any of your details change you can update us by e-

mailing us at [communication.belgium@marsh.com](mailto:communication.belgium@marsh.com), or at [sip@marsh.com](mailto:sip@marsh.com), or log in to the site and update your contact information. **Please keep us informed of changes to your Personal Information.**

You have the right to access your Personal Information and request rectification of any Personal Information in the file that may be obsolete, incomplete or incorrect. However, to secure your Personal Information, Marsh does not provide online access to its customers to view or amend Personal Information in its database.

If you have any questions about this Privacy Policy you can obtain our *Personal Information Question/Request* form by writing or calling our Compliance Officer at the following address or visiting the Marsh Web site [www.marsh.be](http://www.marsh.be):

Compliance Officer

Tel: 00 32 02 6749 611

Marsh N.V./S.A.

Email: [communication.belgium@marsh.com](mailto:communication.belgium@marsh.com)

Avenue Herrmann-Debroux/

Herrmann-Debrouxlaan, 2

BE- 1160 Brussels

BELGIUM

Your Personal Information will be stored and can also be accessed at the Marsh office with which you do business.

A copy of this Privacy Policy (and any significant changes) can be obtained from our Web site at <https://www.sipinsurance.eu>. Marsh is responsible for all Personal Information under its control and has designated a privacy officer who is accountable to Management for Marsh's compliance with this Privacy Policy.

#### QUESTIONS OR TO WITHDRAW CONSENT

You may exercise your right to withdraw your consent to applicable uses or disclosures of your Personal Information (which may limit or terminate the products and services that Marsh provides to you) by writing or sending an email to us at the above address. We will need to validate the identity of anyone making such a request to ensure that we do not provide your information to anyone who does not have the right to such information.

Normally we will respond to access requests within 30 days.

#### COMPLAINTS

Should you wish to register a complaint, you can contact your regular Marsh contact or you may write to or contact Marsh NV/SA at Avenue Herrmann-Debroux / Herrmann-Debrouxlaan, 2 at 1160 Brussels – Belgium. For any further contact details we refer to our website: [www.marsh.be](http://www.marsh.be)

A complaint may also be registered with the Ombudsman des Assurances – Ombudsman van de Verzekeringen whose contact details can be found on the following web address

[:http://www.ombudsman.as/nl/home/index.asp](http://www.ombudsman.as/nl/home/index.asp); <http://www.ombudsman.as/fr/home/index.asp?lq=fr&>

If you have any problem with products or services you have purchased online, you can use the following website to try to reach an out-of-court settlement: <http://ec.europa.eu/odr/>

#### CHANGES TO THIS PRIVACY POLICY



If there is any material change to your rights under this Privacy Policy, Marsh will provide you with notice of such change 30 days prior to the changes going into effect. As part of this notice, Marsh may post a notice of the change on the site in a clear and conspicuous manner for the 30 day notice period. Marsh may also communicate the change via email or postal mail if this is the way that Marsh normally corresponds with you. Please note that your continued use of the Site or Services once this 30 day period are over indicates your agreement to the changes which were the subject of the notice.