GDPR

PRIVACY NOTICE

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SECTION ONE
INTRODUCTION

Marsh, part of the Marsh & McLennan Companies, Inc. (MMC) group, strives to protect the privacy and the confidentiality of Personal Data that the company processes in connection with the services it provides to clients. Marsh's services consist primarily of risk consulting and insurance intermediation, which facilitate the consideration of, access to, administration of, and making of claims in respect of, insurance services.

Insurance is the pooling and sharing of risk against a possible eventuality. In order to do this, information, including the Personal Data of different categories of individuals, needs to be shared between different insurance market participants (see end of document) through the insurance lifecycle (see end of document).

To clarify the terms used in this Privacy Notice we have set out the roles of the key Insurance Market Participants below:

Policyholders: request insurance to protect themselves against risks that could affect them. They may approach an Intermediary (such as Marsh) to purchase insurance or they may approach an Insurer directly or via a price comparison website.

Intermediaries: help Policyholders and Insurers arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through Intermediaries.

Insurers: (sometimes also called underwriters) provide insurance cover to Policyholders in return for payment (premium).

Reinsurers: provide insurance cover to another Insurer or Reinsurer. That insurance is known as reinsurance

During the insurance lifecycle Marsh may receive Personal Data relating to potential or actual Policyholders, Beneficiaries under a policy, their family members, claimants and other parties involved in a claim. Therefore references to "individuals" in this Privacy Notice include any living person from the preceding list, whose Personal Data Marsh receives in connection with the services it provides under its engagements with its clients. This Privacy Notice sets out Marsh's uses of this Personal Data and the disclosures it makes to other Insurance Market Participants and other third parties.

A glossary of key terms used in this Privacy Notice can be found in the last section.

IDENTITY OF CONTROLLER AND CONTACT DETAILS

Marsh LLC Insurance Brokers, 8-10 Sorou Street and Dimitsanas, 151 25 Maroussi, Athens, Greece (**Marsh** or **We**) is the controller in respect of the Personal Data it receives in connection with the services provided under the relevant engagement with its client.

In certain cases, and for the purposes of performing some services, Marsh and its client may have agreed that Marsh is a processor. When Marsh acts as a processor, it complies with the obligations set out in the agreement concluded with its client.

PERSONAL INFORMATION THAT MAY BE PROCESSED

We may collect and process the following **Personal Data**:

- **Individual details** ► name, address (and proof of address), other contact details (e.g., email and telephone details), gender, marital status, family details, date and place of birth, employer, job title and employment history, relationship to the policyholder, insured, beneficiary or claimant.

- **Identification details** ► identification numbers issued by government bodies or agencies (e.g., depending on the country you are in, social security or national insurance number, passport number, ID number, tax identification number, driver's license number).

- **Financial information** ► payment card number, bank account number and account details, income and other financial information.

- **Insured risk** ► Information about the insured risk, which contains Personal Data and may include, only to the extent relevant to the risk being insured:

  — **Health data** ► current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g., smoking or consumption of alcohol), prescription information, medical history; and

  — **Other Special Categories of Personal Data** ► racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric data, data concerning an individual's sex life or sexual orientation.

- **Policy information** ► Information about the quotes individuals receive and the policies they obtain.

- **Credit and anti-fraud data** ► credit history and credit score, information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies.

- **Previous claims** ► Information about previous claims, which may include health data and other Special Categories of Personal Data (as described in the Insured Risk definition above).

- **Current claims** ► Information about current claims, which may include health data and other Special Categories of Personal Data (as described in the Insured Risk definition above).

- **Marketing data** ► Whether or not the individual has consented to receive marketing from us and from third parties.

Where we collect such information directly from individuals, we will inform them of whether the information is required and the consequences of not providing it on the relevant form.

SOURCES OF PERSONAL DATA

We collect Personal Data from various sources, including (depending on the service provided and country you are in):

- Individuals and their family members, online or by telephone, or in written correspondence

- Individuals' employers

- In the event of a claim, third parties including the other party to the claim (claimant/ defendant), witnesses, experts (including medical experts), loss adjustors, lawyers and claims handlers

- Other insurance market participants, such as Insurers, Reinsurers and other Intermediaries

- Credit reference agencies (to the extent Marsh is taking any credit risk)

- Anti-fraud databases and other third party databases, including sanctions lists

- Government agencies, such as vehicle registration authorities and tax authorities

- Claim forms

HOW WE USE AND DISCLOSE YOUR PERSONAL DATA

In this section, we set out the purposes for which we use Personal Data, explain how we share the information, and identify the "legal grounds" on which we rely to process the information.

These "legal grounds" are set out in the General Data Protection Regulation (**GDPR**) 2016/679/EE, which allows companies to process Personal Data only when the processing is permitted by the specific "legal grounds" set out in the regulation.

Please note that in addition to the disclosures we have identified in the table below, we may disclose Personal Data for the purposes we explain in this Privacy Notice to service providers, contractors, agents and MMC group companies that perform activities on our behalf.

Purpose of Processing	Legal grounds	Disclosures
Quotation/ Inception		
Establishing a client relationship, including fraud, anti-money laundering and sanctions checks	• Performance of our contract with the client. • Compliance with a legal obligation • Legitimate interests of Marsh (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud) *For processing Special Categories of Personal Data (e.g. health information):* • Consent • Substantial public interest	• Anti-fraud databases
Checking credit where we are taking any credit risk	• Legitimate interests of Marsh (to ensure that the client is within our acceptable risk profile and to assist with the prevention of crime and fraud)	• Credit reference agencies
Evaluating the risks to be covered and matching to appropriate insurer, policy and premium	• Performance of our contract with client. • Legitimate interests of Marsh (to determine the likely risk profile and appropriate insurer and insurance product) *For processing Special Categories of Personal Data (e.g. health information):* • Consent • Substantial public interest	• Insurers
Policy Administration		
General client care, including communicating with clients	• Performance of our contract with the client. • Legitimate interests of Marsh (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies) *For processing Special Categories of Personal Data (e.g. health information):* • Consent • Substantial public interest	

Purpose of Processing	Legal grounds	Disclosures
Collection or refunding of premiums, paying on claims, and processing and facilitating other payments	• Performance of our contract with the client. • Legitimate interests of Marsh (to recover debts due to us)	• Insurers • Banks • Debt recovery providers
Claims processing		
Managing insurance claims	• Performance of our contract with the client. • Legitimate interests of Marsh (to assist our clients in assessing and making claims) ***For processing Special Categories of Personal Data (e.g. health information):*** • Consent • Substantial public interest	• Insurers • Claims handlers • Lawyers • Loss adjustors • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Defending or prosecuting legal claims	• Performance of our contract with client • Legitimate interests of Marsh (to assist our client in assessing and making claims) ***For processing Special Categories of Personal Data (e.g. health information):*** • To establish, defend or prosecute legal claims	• Insurers • Claims handlers • Lawyers • Loss adjustors • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals

Purpose of Processing	Legal grounds	Disclosures
Investigating & prosecuting fraud	• Performance of our contract with the client • Legitimate interests of Marsh (to assist with the prevention and detection of fraud) ***For processing Special Categories of Personal Data (e.g. health information):*** • To establish, defend or prosecute legal claims • Consent • Substantial public interest	• Insurers • Lawyers • Police • Experts • Other insurers • Anti-fraud databases • Third parties involved in the investigation or prosecution, such as private investigators
Renewals		
Contacting you in order to arrange the renewal of the insurance policy	• Performance of our contract with the client • Legitimate interests of Marsh (to correspond with clients to facilitate the continuation of insurance cover)	• Insurers
Throughout the insurance lifecycle		
Marketing analytics and direct marketing, including data anonymization	• Legitimate interests of Marsh (to bring clients relevant offers) • Where we do not have an existing relationship with the individual, consent	• Insurers • Group companies
Transferring books of business, company sales and reorganisations	• Legitimate interests of Marsh (to structure our business appropriately) ***For processing Sensitive Personal Information:*** • Consent	• Group companies • Courts • Purchaser (potential and actual)
General risk modelling	• Legitimate interests of Marsh (to build risk models that allow placing of risk with appropriate insurers) ***For processing Special Categories of Personal Data (e.g. health information):*** • Consent	
Complying with our legal or regulatory obligations	• Compliance with a legal obligation • Legitimate interests of Marsh (to take pre-emptive steps to ensure legal and regulatory compliance) ***For processing Special Categories of Personal Data (e.g. health information):*** • To establish, defend or prosecute legal claims • Consent	• Insurance, data protection and other regulators • Police • Insurers • Auditors

CONSENT

In order to facilitate the provision of insurance cover and administer insurance claims, unless another legal ground applies, we rely on the data subject's consent to process Special Categories of Personal Data such as medical records, as set out in the table above and for profiling as set out in the next section. This consent allows us to share the information with other Insurers, Intermediaries and Reinsurers that may need to process the information in order to undertake their role in the insurance market (which in turn allows for the pooling and pricing of risk in a sustainable manner).

The affected individual's consent to this processing of Special Categories of Personal Data may be necessary for Marsh to be able to provide the services the client requests.

Where you are providing us with information about a person other than yourself, you agree to notify them of our use of their Personal Data and to obtain such consent for us.

Individuals may withdraw their consent to such processing at any time. However, doing so may prevent Marsh from continuing to provide the services. In addition, if an individual withdraws consent to an Insurer's or Reinsurer's processing of their Special Categories of Personal Data, it may not be possible for the insurance cover to continue.

PROFILING AND AUTOMATED DECISION MAKING

Insurance premiums are calculated by insurance market participants benchmarking clients' and beneficiaries' attributes as against other clients' and beneficiaries' attributes and propensities for insured events to occur. This benchmarking requires Marsh and other insurance market participants to analyse and compile information received from all insureds, beneficiaries or claimants to model such propensities. Accordingly, we may use Personal Data to both match against the information in the models and to create the models that determine the premium pricing in general and for other insureds. Marsh and other insurance market participants may use Special Categories of Personal Data for such modelling to the extent it is relevant, such as medical history for life insurance.

Marsh and other insurance market participants use similar predictive techniques to assess information that clients and individuals provide to understand fraud patterns, the probability of future losses actually occurring in claims scenarios, and as set out below.

We use these models only for the purposes listed in this Privacy Notice. In most cases, our staff make decisions based on the models.

- **Automated broking platform**

Where clients use an automated broking platform, insurance quotations are offered entirely by matching whether the attributes that the client has provided meet the criteria set by the insurers, which determines, to the extent permitted by applicable law (a) whether a quotation will be made; (b) on what terms; and (c) at what price. Each insurer will use different algorithms to determine their pricing, and clients must consult each insurer's privacy policy for further details. Our platform merely queries whether clients' attributes satisfy insurers' models and then returns the results. If the potential insured's attributes do not satisfy insurers' models, the quotation request is referred for review by a team with underwriting authority. We also apply fraud prediction algorithms to the information clients provide to assist us in detecting and preventing fraud. We regularly review all profiling and associated algorithms against inaccuracies and bias.

These automated processes may result in a client not being offered insurance or affect the price or terms of the insurance.

Clients may request that we provide information about the decision-making methodology and ask us to verify that the automated decision has been made correctly. We may reject the request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime but generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias.

SAFEGUARDS

We have in place physical, electronic, and procedural safeguards appropriate to the sensitivity of the information we maintain. These safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Data, and include measures designed to keep Personal Data protected from unauthorized access. If appropriate, the safeguards include the encryption of communications via SSL, encryption of information during storage, firewalls, access controls, separation of duties, and similar security protocols. We restrict access to Personal Data to personnel and third parties that require access to such information for legitimate, relevant business purposes.

LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION

We collect, use, disclose and otherwise process Personal Data that is necessary for the purposes identified in this Privacy Notice or as permitted by law. If we require Personal Data for a purpose inconsistent with the purposes we

identified in this Privacy Notice, we will notify clients of the new purpose and, where required, seek individuals' consent (or ask other parties to do so on Marsh's behalf) to process Personal Data for the new purposes.

Our retention periods for Personal Data are based on business needs and legal requirements. We retain Personal Data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose or as required by law. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Data is no longer needed, we either irreversibly anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

CROSS–BORDER TRANSFER OF PERSONAL INFORMATION

Marsh transfers Personal Data to, or permits access to Personal Data from, countries outside the European Economic Area (EEA). These countries' data protection laws do not always offer the same level of protection for Personal Data as offered in the EEA. We will, in all circumstances, safeguard Personal Data as set out in this Privacy Notice.

Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections as EEA data protection laws. EU data protection laws allow Marsh to freely transfer Personal Data to such countries.

If we transfer Personal Data to other countries outside the EEA, we will establish legal grounds justifying such transfer, such as MMC Binding Corporate Rules, model contractual clauses, individuals' consent, or other legal grounds permitted by applicable legal requirements.

Individuals can request additional information about the specific safeguards applied to the export of their Personal Data by contacting the Compliance Officer at the address below.

ACCURACY, ACCOUNTABILITY, OPENNESS AND YOUR RIGHTS

We strive to maintain Personal Data that is accurate, complete and current. Individuals should contact us at greece.compliance@marsh.com to update their information.

Questions regarding Marsh's privacy practices should be first directed to Marsh's Compliance Officer.

Under certain conditions, individuals have the right to request Marsh to:

- Provide further details on how we use and process their Personal Data;

- Provide a copy of the Personal Data we maintain about the individual;

- Update any inaccuracies in the Personal Data we hold;

- Delete Personal Data that we no longer have a legal ground to process;

- Where processing is based on consent, to withdraw the consent;

- Object to any processing of Personal Data that Marsh justifies on the "legitimate interests" legal grounds, unless our reasons for undertaking that processing outweigh any prejudice to the individual's privacy rights; and

- Restrict how we process the Personal Data while we consider your inquiry.

These rights are subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege). We will respond to most requests within 30 days.

If we are unable to resolve an inquiry or a complaint, individuals have the right to lodge a complaint with the applicable supervisory authority, Hellenic Data Protection Authority.

QUESTIONS, REQUESTS OR COMPLAINTS

 To submit questions or requests regarding this Privacy Notice or Marsh's privacy practices, please write to the Compliance Officer at the following address:

The Compliance Officer
Marsh LLC Insurance Brokers
8-10 Sorou Street and Dimitsanas,
151 25 Maroussi,
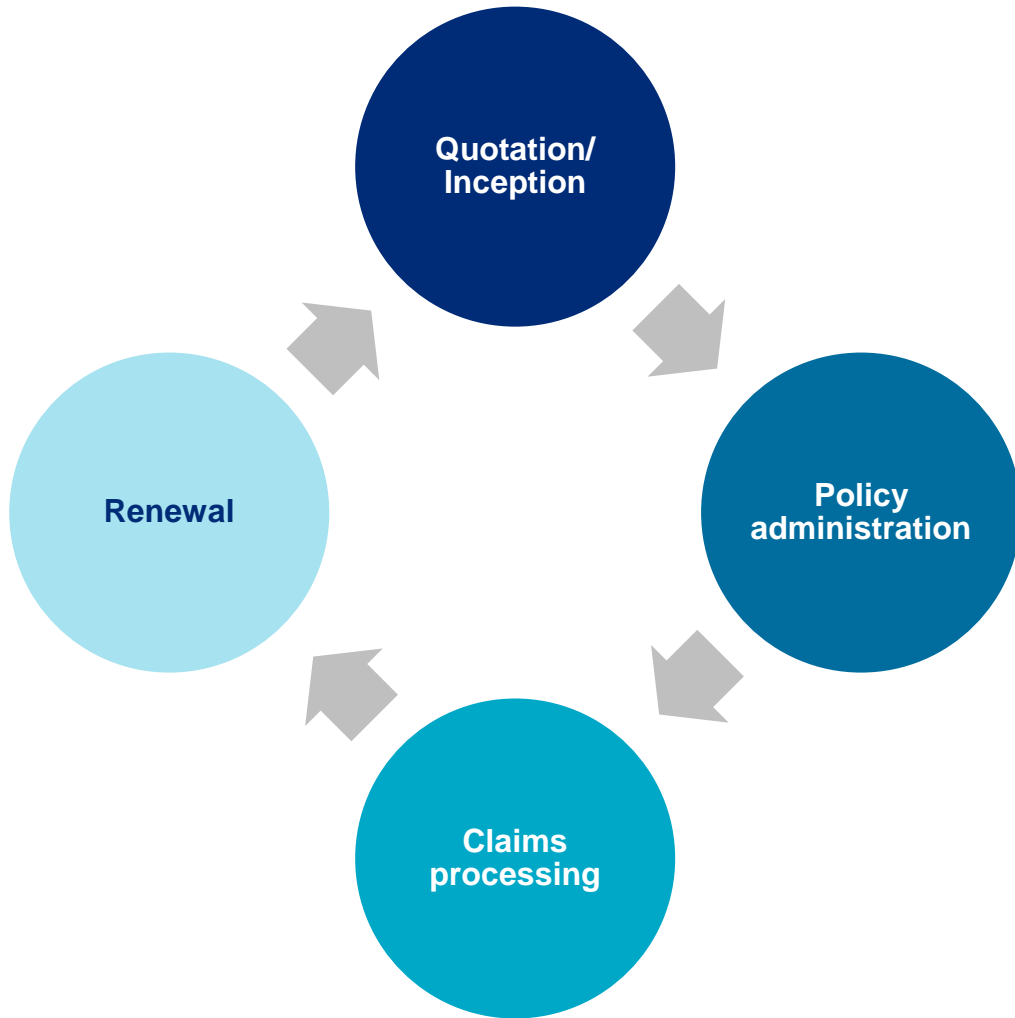Athens, Greece
Email: greece.compliance@marsh.com

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice is subject to change at any time. It was last changed on 05.04.18. If we make changes to this Privacy Notice, we will update the date it was last changed. Any changes we make to this Privacy Notice become effective immediately.

INSURANCE LIFECYCLE

FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE

Stage of Insurance Lifecycle	You	Who has access to your Personal Data		
Quotation/ Inception	Policyholder /Insured Beneficiary	Intermediary	Insurer	Reinsurer
Policy administration				
Claims Processing	Claimant			
Renewal	Policyholder/ Insured Beneficiary			
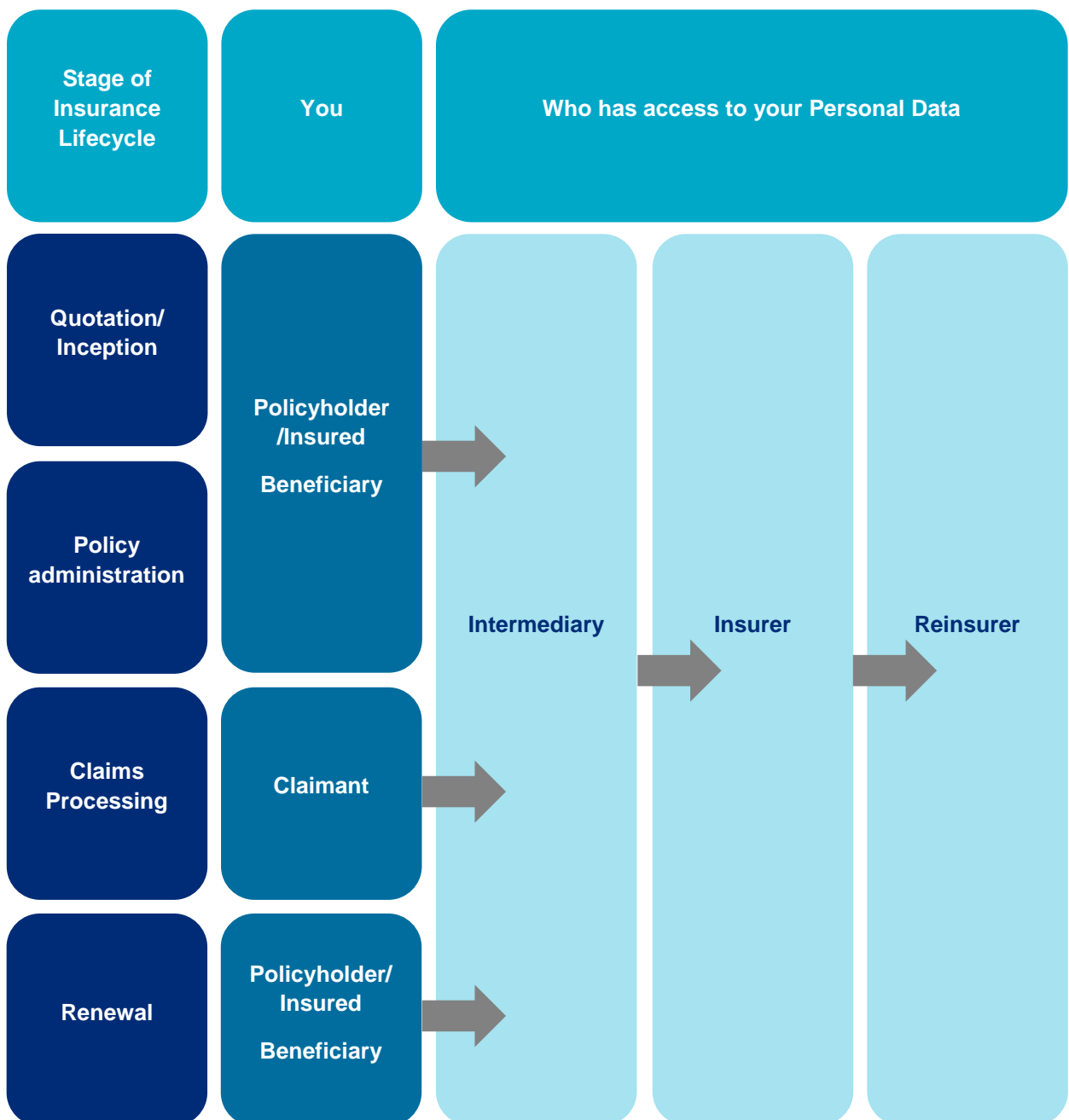
KEY INSURANCE TERMS

- **Beneficiary** is an individual or a company that an insurance policy states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the **insured/policyholder** and there may be more than one beneficiary under an **insurance policy**

- **Claimant** is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**

- **Claims processing** is the process of handling a claim that is made under an insurance policy

- **Quotation** is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**

- **Inception** is when the **insurance policy** starts

- **Insurance** is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression **insurance** may also mean **reinsurance**

- **Insurance policy** is a contract of insurance between the **insurer** and the **insured**/**policyholder**

- **Insurance market participant(s)** *or* **participants** is an **intermediary**, **insurer** or **reinsurer**

- **Insured/policyholder** is the individual or company in whose name the **insurance policy** is issued. A potential insured/policyholder may approach an **intermediary** to purchase an **insurance policy** or they may approach an **insurer** directly or via a price comparison website

- **Insurers** (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for **premium.** An **insurer** may also be a **reinsurer**

- **Intermediaries** help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**

- **Policy administration** is the process of administering and managing an **insurance policy** following its **inception**

- **Premium** is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy**

- **Reinsurers** provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance

- **Renewal** is the process of the **insurer** under an **insurance policy** providing a **quotation** to the **insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry

KEY DATA PROTECTION TERMS:

- *GDPR* is the EU General Data Protection Regulation and the national data protection legislation in force in the relevant EU Member State where Marsh is established

- *Data controller* is an entity which collects and holds personal data. It decides what **personal data** it collects about **you** and how that **personal data** is used. Any of the **insurance market participants** when using **your personal data** for the purposes set out in [How we use and disclose your personal data] could be **data controllers**

- *Data processor* is an entity which processes personal data on behalf of the **data controller**

- *Personal data* is any data from which **you** can be identified and which relates to **you**. It may include data about any claims **you** make

- *Processing of personal data* includes collecting, using, storing, disclosing or erasing your **personal data**

Appendix

List of the legal grounds we rely on:

For processing personal data and special categories of personal data	
Legal ground	**Details**
Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child. These legitimate interests are set out next to each purpose.
For processing special categories of personal data	
You explicit consent	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection Contact. However withdrawal of this consent may impact our ability to provide the services. For more detail see the Consent section above.
For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
Substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of EU or Greek law.

MARSH