

MARSH MCLENNAN AGENCY A/S PRIVACY NOTICE

Who are we?

Marsh McLennan Agency A/S is the data controller for the personal data we process in connection with the services we provide (together "**we**", "**us**" or "**our**"). We develop and maintain insurance programs with insurers to provide insurance products to their customers in Denmark.

What is the purpose of this notice?

We take the security of your personal data very seriously and we want to be transparent about how we collect and handle the personal data of the users, including individuals with administration rights, employees and other authorized users ("**you**" or "**your**").

This privacy notice (together with our Cookie policy which can be found on our website) describes our collection and sharing practices, the uses to which personal data is put, the ways in which we protect it in accordance with applicable European and local data privacy laws applicable in your jurisdiction, including but not limited to General Data Protection Regulation (Regulation (EU) 2016/679) (hereafter "**EU GDPR**") and Databeskyttelsesloven nr 502 (Danish Data Protection Act) ("**Data Protection Laws**") and your privacy rights.

Identifying the Data Controller

In general, we are the Data Controller of your personal data because we determine how and why we will use your personal data.

This privacy notice is intended to supplement the applicable insurer's privacy policy.

1. WHAT INFORMATION DO WE COLLECT?

Information provided by you, the Insurer or third parties

We may collect information directly from you, the applicable Insurer and from certain third parties that have roles in delivering services to you. We process your personal data only when necessary in the course of our business.

This information will include the following categories of personal data (where applicable):

For payment security and claims handling:

- Contact data (e.g. name, address, email address, cell phone number);
- Your CPR number (Danish personal identification number);
- Documentation from any trade union;
- Health information collected from doctors, hospitals, clinics, centers, laboratories, and/or specialists, provided that you have given your consent;
- Banking information (e.g. IBAN number);
- Data related to your offer or contract (contract ID, offer ID, policy number).

When entering into insurance policies:

- Identification Data (e.g., date of birth, gender);
- Contact and product information, including IMEI numbers, from workshops, public authorities and other involved parties.

For commercial insurance:

- Contact data (e.g. name, address, email address, cell phone number);
- CPR number;
- Family relationships;
- Trade union information from your employer;
- Data about your interactions as a Customer (e.g. complaints, feedback);
- Data related to the use you make of our products and services (e.g. language, customer history); or
- Data from communications you have with us.

If you supply us with personal data about other people (for example if you provide us with information about a family member or dependent), you represent that you have the authority to provide this information on their behalf. In these instances, you further agree that the individuals to whom this information relates have been informed of and understand the reason(s) for obtaining the information, the manner in which this information will be used and disclosed, and have consented to such use and disclosure.

You are not obliged to provide us with any of your personal data, but please note that if you do not provide us with certain types of personal data, we may not be able to provide you with certain services under our contract with them or our terms of use with you.

Information collected by automated means

We use cookies and related tracking technologies ("Cookies") on our company-owned websites. If available based on your jurisdiction, website users can opt-out of our use of certain Cookies using the Manage Cookies link at the bottom of the website and find out more about how we use Cookies by selecting the Cookie Notice link.

Updating information

Keeping your information accurate and up-to-date is very important. Inaccurate or incomplete information could impair our ability to deliver relevant services to you or to your employer. We will use reasonable endeavors to ensure that your personal data is accurate. In order to assist us with this, you should notify us of any changes to your personal data.

2. HOW DO WE USE THE DATA WE COLLECT?

As a Controller, we use (or may use) your personal data for

- 1) providing you with access to services and products;
- 2) policy administration and claims processing;
- 3) establishing and managing our client relationship;
- 4) carrying out fraud, anti-money laundering, sanctions and any other checks and investigating and prosecuting fraud, money laundering or sanctions violations in connection with the establishment and maintenance of a client relationship and provision of services;
- 5) for research, data analytics and development purposes;
- 6) where required for compliance with legal and regulatory obligations; and
- 7) the defense or potential defense of legal claims or complaints.

Please note that we do not use your personal data for automated decision-making, profiling or scoring purposes.

3. HOW WE SHARE AND DISCLOSE YOUR PERSONAL DATA

We may share your personal data to assist with the activities set out in section 2 above or to provide other products or services or support as requested by you. In particular, we may share this information with:

Categories of third parties	Purpose for Disclosure
Insurers, third-party agents/brokers, and/or other similar third parties	As necessary to provide our contracted services
Your employer, association, group, or benefit program sponsor (when applicable)	Assist in the administration of a group insurance program and as otherwise necessary to provide our contracted services.
Affiliates	Assist in providing the services and enable them to provide services to you or contact you regarding additional products and services.
Agents or third-party service providers	Perform functions or services for us or on our behalf. Such third parties are contractually restricted from using Personal Data for purposes other than providing services for us or on our behalf.
Marketing partners, including affiliates and third parties engaged by us or our clients in connection with the services.	As permitted by law to provide you with information about our products, services, events, or insights.
Potential partners or successor entities	In the context of mergers, acquisitions, bankruptcies, asset sales or other transactions where a third party assumes control of all or part of our assets.
Website analytics and advertising companies	To improve our services, for general operations and business needs, and to help us to improve user experiences on our websites and personalize content, measure the performance and use of content on our websites, and derive insights about the audiences who visit our websites and review content.
Anti-fraud databases, supervisory or regulatory authorities, law enforcement and other third parties	As necessary to prevent fraud, communicate with supervisory or regulatory authorities, protect, enforce and defend the legal rights, safety, and security of our Company, our affiliates and business partners, and users of any website; respond to claims of suspected or actual illegal activity; respond to an audit or inquiry, or investigate a complaint or security threat; or comply with applicable law, regulation, legal process, or governmental request.

We may also disclose de-identified information that is not reasonably likely to identify you for commercially legitimate and lawful business purposes. Where we have de-identified information, we will maintain and use it without attempting to re-identify the data other than as permitted under law.

4. USING YOUR INFORMATION IN ACCORDANCE WITH DATA PROTECTION LAWS

We will only process your personal data where there is a lawful basis for doing so. In respect of your personal data, these bases are where it is necessary to provide services to you in connection with the contract you have with us; where we are required to do so in accordance with legal or regulatory obligations; where you have given your consent via our cookies banner or other specific opt-in method; and, if relevant under the applicable Data Protection Law of your jurisdiction, where it is necessary for the purposes of our legitimate interests to process your personal data, provided that these do not prejudice your own rights, freedoms and interests. The legitimate interests that we may pursue in processing your personal data as a Controller are our interests in understanding, administering and improving use of our services

Purpose	Legal basis as controller
Providing you with insurance services	Performance of our contract Compliance with a legal obligation, and, where applicable, legitimate interests (to enable us to perform our obligations and provide our services to you).
Policy administration and claims processing	Performance of our contract The processing is necessary for our legitimate interests (for example to correspondence with clients, assist in assessing and making claims under relevant insurance policies)
Managing our client relationship	The processing is necessary for our legitimate interest in ensuring business performance Performance of our contract
To monitor interactions with the website to ensure service quality, compliance with procedures and to communicate via the website.	The processing occurs on the basis of consent (such as cookie banners and other specific opt-in method) Legitimate interests (to ensure the quality and legality of our online services)
Carrying out fraud, anti-money laundering, sanctions and any other checks and investigating and prosecuting fraud, money laundering or sanctions violations in connection with the establishment and maintenance of a client relationship and provision of services	The processing is necessary for compliance with legal obligations applicable to us The processing is necessary for our legitimate interest in ensuring business performance
Where required for compliance with legal and regulatory obligations	The processing is necessary for a legal obligation applicable to us

The defence or potential defence of legal claims or complaints.	The processing is necessary for our legitimate interest in ensuring business performance
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5. HOW LONG WE KEEP YOUR INFORMATION FOR

We will retain your personal data for as long as we need it for our purposes, and we will either delete it or make sure that you cannot be identified from it as soon as we no longer need to identify you from it. You may ask us to delete your personal data at any time – see section 8 below for details of how to do this. However, please note that in certain circumstances we may not be able to comply with your request to delete your personal data if we have legal grounds to retain it, for example where the law requires this, or it is no longer considered personal data.

6. SENDING DATA OUTSIDE OF THE EEA

As we operate via a global network of corporate offices, we may need to transfer your personal data to a country outside of the country where it was originally collected, or outside of your country of residence or nationality either to other entities within our group in the countries in which we operate, or to others as set out in section 3 above. Such transfers may include transferring your personal data outside of highly regulated jurisdictions such as the European Economic Area ('EEA'), which may have different, including lower, standards of protection for personal data from those in the originating country.

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 us to freely transfer Personal Data to such countries.

We will make every effort to ensure that these transfers adhere to all relevant Data Protection Laws, and that the rights and freedoms of individuals under such laws are appropriately safeguarded.

Where the need for such a transfer arises, we will take steps to ensure that there are appropriate safeguards in place to protect personal data such as an impact assessment, adequacy decision by the appropriate supervisory authority, the use of approved binding corporate rules or standard contractual clauses.

For information regarding how Marsh & McLennan Companies' EU (European Union) Binding Corporate Rules (EU BCRs) operate, [click here](#). For a list of entities that have agreed to be bound by the EU BCRs, [click here](#).

7. WHAT STEPS DO WE TAKE TO PROTECT YOUR INFORMATION?

We are committed to protecting the confidentiality and security of the personal data that you provide to us. All personal data that you provide to us is stored on our, or our subcontractors', secure servers and accessed and used subject to our security policies and standards.

We have implemented commercially reasonable physical, electronic, procedural, administrative, and technical safeguards in a way that complies with the security requirements of the Data Protection Laws to protect your personal data, located in the countries where we are based (which may be outside the EEA), from unauthorized access. However, as effective as our security measures are, no security system is impenetrable. We will take all appropriate measures, but please note that we

cannot guarantee the security of these systems, nor can we guarantee that information supplied by you or on your behalf cannot be intercepted while being transmitted over the Internet.

We restrict access to your personal data to those employees of ours, our affiliates, and subcontractors who reasonably need it to provide products or services.

8. YOUR RIGHTS

Individuals located in the EEA, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to:

Right of access (Right to know)

You may ask us to provide you with further details on how we make use of your personal data, the sources, the categories or specific pieces of personal data we have collected, the categories of third parties to whom we have disclosed the information, and to request a copy of the personal data that we hold about you.

Right to correct

You may ask us to update any inaccuracies in the personal data we hold. If we disclose your personal data to others, we will tell them about the correction where possible.

Right to delete

You may ask us to erase your personal data where we for example no longer have lawful grounds to process it.

Right to object to or restrict processing

You may have a right to restrict the processing of your personal data if the applicable legal provisions are complied with.

Right to data portability

You may have the right, where it is technically feasible, to ask that we transfer to a third party of your choice a copy of personal data we have obtained from you, in a structured, commonly used, and machine-readable format.

Right to withdraw consent

If we rely on your consent as our legal basis for processing your personal data, you have the right to withdraw that consent. This withdrawal will however not affect the lawfulness of the processing of your personal data for the period prior to the time of this withdrawal and processing activities based on another legal basis.

Right to lodge a complaint

You have the right to lodge a complaint with the relevant supervisory or regulatory authority of your place of habitual residence or work or where an alleged infringement took place. For Denmark, this is the [Danish Data Protection Authority](#) (Datatilsynet). The list of the data protection authorities in the European Economic Area is available via the following link: https://edpb.europa.eu/about-edpb/board/members_en.

9. THIRD PARTY WEBSITES/SYSTEMS

External Links

Our websites may include links to websites that are operated by organizations other than the Company. If you access another organization's website using a hyperlink on our website, the other organization may collect information from you. The Company is not responsible for the content or privacy practices of linked websites or their use of your Personal Data. If you leave a Company website via such a link (you can tell where you are by checking the URL in the location bar on your browser), you should refer to that website's privacy policies, terms of use, and other notices to determine how the other organization will handle any Personal Data they collect from you.

Collection by Third Parties

If you conduct a transaction through us, a third party (e.g., a service provider or insurer) may collect and process credit card or other Personal Data about you, including through Cookies, in connection with such a transaction. In those instances, and for any other arrangement where we receive information from your employer, association or other third party, we encourage you to read the third party's privacy policy to learn more about how your information will be used and disclosed by them.

10. CHANGES TO THIS PRIVACY NOTICE

This privacy notice may be updated from time to time. We recommend that you review this privacy notice regularly for changes.

11. HOW TO CONTACT US

To submit questions or requests regarding this Privacy Notice or the Company's privacy practices, please email us at privacy@marsh.com. If you would prefer to contact us by post or by phone, please contact your local Data Protection Officer. You can find the contact information for your local Data Protection Officer by emailing us at privacy@marsh.com.