

March 2009

WILLIS PRIVACY POLICY

ABOUT WILLIS

The Willis Group is a world leader in providing risk management solutions, risk transfer expertise and specialist consultancy services.

We are one of only three major risk management and insurance intermediaries that operate on a worldwide basis. Group members include our retail business across Australia, a fully owned reinsurance company, a specialist underwriting agency and a joint venture broking company.

We are part of an international network of worldwide offices in over 100 countries. Each office has access to the global knowledge resources of the group enabling us to offer a global operating service, broad product expertise and an office distribution network capable of providing solutions to satisfy our clients' insurance and risk management needs.

ABOUT THE WILLIS PRIVACY POLICY

The Willis Group respects your privacy and is committed to protecting the personal information of its clients.

In Australia Willis are covered by the Federal Privacy Act and its National Privacy Principles (NPPs) which set out standards for the collection, use, disclosure and handling of personal information.

Personal information is essentially any information or opinion that can identify a person (e.g. a name and address).

HOW AND WHY WILLIS COLLECT PERSONAL INFORMATION

Willis collects personal information either directly from individuals or indirectly from third parties. For example, an insured party may not only provide Willis with information on themselves for the purpose of utilising its services but also on another insureds that they represent (e.g. other insurance brokers). Willis may also obtain personal information from past insurers, witnesses to claims and publicly available sources. Without collecting and using the information provided to us, we would not be able to do business with you.

Willis collects personal information during the course of its relationship with you. Collection of information may take place in a number of ways, such as when you complete an application form for a new product or service or at renewal, request a product or service over the internet, telephone or email or contact Willis to lodge a claim. By supplying personal, sensitive or health information about yourself and/or on behalf of those you represent or by making a claim or otherwise making use of our services which may involve the collection of sensitive or health information from third parties, you will be taken to have given your consent to the collection of that personal, sensitive or health information about you (from you or those third parties).

Willis collects personal information in order to provide its various services. These include:

- Insurance Broking
- Risk Management Consultancy
- Reinsurance
- Claims Management
- Underwriting Management

Willis may also use personal information to:

- Help determine insurance requirements and provide appropriate products and services
- Develop and identify products and services that may interest clients
- Conduct customer satisfaction surveys
- Establish and administer alliances and other arrangements with other organisations in relation to the promotion, administration and use of Willis respective products and services

For more information regarding Willis services please contact your Willis representative.

HOW WILLIS USES AND DISCLOSES PERSONAL INFORMATION

Willis does not use or disclose personal information for any purpose that is unrelated to its services and that you would not reasonably expect (except with your consent).

Willis has a duty to maintain the confidentiality of its clients affairs which includes their personal information. Willis duty of confidentiality applies except where disclosure of your personal information is with your consent or required by law.

Willis discloses personal information to third parties who are involved in the provision of its services. For example, in arranging and managing your insurance needs Willis may provide information to insurers, reinsurers or other insurance intermediaries, its advisors such as loss adjustors, lawyers and accountants and other parties involved in the claims handling process. Willis may disclose your personal information to mail service providers for the mailing of statements, insurance policy documentation and/or Willis direct marketing material or use your personal information during the process of staff training. Willis may also provide it to purchasers or its business and related Willis Group companies.

Willis takes reasonable steps to ensure that the personal information it collects from you is accurate, complete and up-to-date whenever Willis collects, uses or discloses it.

If the personal information Willis requests from you is not provided, Willis or any involved third party may not be able to provide the appropriate services.

WHAT WILLIS EXPECTS OF YOU AND THIRD PARTIES IT DEALS WITH

When you provide Willis with personal information about other individuals, Willis relies on you to have made them aware that; you will or may provide their information to Willis, the purposes Willis uses it for, the types of third parties Willis discloses it to and how they can access it (as described in this policy). If it is sensitive or health information Willis relies on you to have obtained their consent to the above. If you have not done either of these things you must notify Willis before you provide the relevant information.

We rely on you to ensure that the personal information we collect from you is accurate, complete and up-to-date. Willis may contact you to confirm or change the details of your personal information, however you can contact Willis at any time to update your personal information.

If Willis provides you with personal information, you and your representatives must only use it for the purposes Willis agrees to. Where relevant, in Australia you must meet the requirements of the NPPs set out in the Privacy Act 1988 when collecting, using, disclosing and handling personal information on Willis behalf. This obligation extends to your agents, employees and contractors.

In some cases we will require you to specifically consent to the collection, use or disclosure of your personal information by Willis. Your consent will usually be required in writing and in some cases your consent may be implied through your conduct such as when you continue a telephone call after you have been advised that the personal information will be collected, used or disclosed.

SECURITY OF YOUR PERSONAL INFORMATION

Willis takes all reasonable steps to protect any personal information that it holds from misuse and loss, and protect it from unauthorised access, modification and disclosure. For example, Willis maintains physical security over its manual and electronic records and premises, such as locks, security systems and after hours security checks. Willis also maintains computer and network security, including firewalls to prevent unauthorised internet access to records, user passwords to control access to computer systems and a comprehensive Business Continuity (Disaster Recovery) Plan.

SENSITIVE INFORMATION

Sensitive information is defined as including information about someone's political opinions or membership, professional or trade membership, sexual preferences, criminal records, state of health, religion, racial or ethical origin. Willis will only collect, use or disclose sensitive or health information with the consent of the person to whom it relates or is required by law.

TRANSFER OF INFORMATION OVERSEAS

Willis may transfer your information overseas where it is necessary to provide its services. For example, some insurers and reinsurers are based overseas and Willis may need to provide your personal information to them in order to place your insurance cover. In most cases we will not do this without your consent.

DIRECT MARKETING

Willis may make use of your personal information to provide you with information about its products and services. If you do not want to receive any of this information or you do not want to disclose your information to any other organisation including related corporate bodies simply contact with Willis Privacy Officer as outlined below and you will not receive any further information. If you change your mind and want to receive information about Willis products and services at a later date, simply let Willis know.

By law, Willis is sometimes required to provide you with information related to the products and services you receive from us. You will continue to receive information about these products and services even if you have chosen not to receive general information about other products and services.

Willis does not disclose your personal information to any other party outside the Willis Group solely for the purpose of direct marketing their products and services to you.

ACCESSING YOUR PERSONAL INFORMATION

You are entitled to request access to the information Willis holds on you.

If you have reason to believe that the personal information Willis holds is inaccurate, incomplete or out of date, you are entitled to request that the information be amended.

Willis is not always required to provide you with access to your personal information, however, if your request is denied an explanation will be provided to you.

Willis may be required by law to retain your personal information for a specified period of time after you have ended your relationship with us. After the expiry of this required time, all reasonable steps will be taken to ensure the secure destruction of your personal information.

To make an enquiry or lodge a change request regarding your personal information, please contact the Willis Privacy Officer during business hours at:

Willis Australia Limited
Level 5, 570 Bourke Street, Melbourne, VIC 3000.
Telephone: (03) 8681 9800
Fax: (03) 8681 9888
Email: aust_privacy@willis.com

There is generally no fee for requesting access to your personal information. In some cases however, a fee may be charged to recover costs where the information has to be retrieved from archives.


CONCERNS ABOUT YOUR PRIVACY

If you have a concern about your privacy, or you believe that your privacy has been breached, please address your complaint in writing to the Privacy Officer at:

Willis Australia Limited
Level 5, 570 Bourke Street, Melbourne, VIC 3000.
Telephone: (03) 8681 9800
Fax: (03) 8681 9888
Email: aust_privacy@willis.com

Willis New Zealand
PO Box 369, Auckland
Telephone: (09) 3583319
Fax: (09) 3583343
Email: aust_privacy@willis.com

Willis will respond to your complaint as soon as possible and will take all steps to resolve the complaint with you.



For Australia only, if you are not satisfied with the response you receive, you can lodge a complaint with the Federal Privacy Commissioner who can be contacted at:

Director of Compliance
Office of the Federal Privacy Commissioner
GPO Box 5218, NSW 1042
Telephone:1300 363 992

CHANGES TO THE WILLIS PRIVACY POLICY

Willis reviews all its policies and procedures to keep up-to-date with changes in law, technology or the market and therefore will from time to time make appropriate changes to this policy.

This Privacy Policy was last amended on 13th March 2009.