

Oliver Wyman Privacy Notice

Oliver Wyman strives to protect the privacy and the confidentiality of personal information that we process, including that of visitors to this website (the “Site”) and the use of the service(s) provided through this Site (the “Service”). This Privacy Notice explains the personal information we collect about you as a user of the Service, how we use, share, and protect that personal information, and what your rights are with respect to your personal information that we gather.

The Privacy Notice is subject to change at any time. If we make changes to this Privacy Notice, we will update the “Effective date” at the top of this page. Any changes we make to this Privacy Notice become effective immediately, so you should review this Privacy Notice regularly for changes.

The Privacy Notice is incorporated into our Terms of Use. By using the Service, you acknowledge that you have read, understand and accept the Terms of Use, including this Privacy Notice. Please take a moment to familiarize yourself with our privacy practices.

Scope of this Privacy Notice

This Privacy Notice applies solely to data collected in relation to this Site and the Service. We gather this information when you:

- Register as an authorized user of the Service
- Update your account information
- Visit or use this Site or the Service
- Provide us with the information required to fulfill the Service

We provide the Service pursuant to a contract we have entered into with our corporate client (“Client”), who is the business ultimately responsible for determining how your personal information will be processed. As such, we act as a “service provider” when it comes to handling your personal information, which means all of the personal information that we collect from or about you in connection with the Service is processed under the direction of our Client and governed by our agreement with our Client. We have no direct ownership over your personal information. Instead, our collection, use, sharing, and retention of your personal information collected through the Service is limited to providing the services for which our Client has engaged us.

Accordingly, if you are using the Service in connection with your duties of employment or by virtue of some other relationship with our Client, we encourage you to review our Client’s own privacy notice to understand the full scope of how your personal information will be handled. This includes any processing performed by our Client if we make your personal information available to our Client, as described in this Privacy Notice.

Further, in any case where we are acting as a service provider to our Client, if you wish to exercise any rights that may be available to you under certain data privacy laws (for example, the right to access or deletion under the California Consumer Privacy Act if you are a resident of California), you should direct your request to our Client, who is the party responsible for receiving, assessing, and responding to your requests, as we do not have any obligation, and, notwithstanding anything in this Privacy Notice to the contrary, may elect not, to respond to your requests.

What Data Do We Collect?

"**Personal information**" is information that identifies you as an individual or relates to an identifiable individual.

In the course of registering for and using the Service, we collect from you or your employer the following personal information: first and last name, email address, user ID, password, employer, and phone number.

We also use temporary session cookies that remain in the cookie file on your browser until you close the browser. These cookies do not track your Internet usage after leaving the Site and do not store your personal information. You can refuse to accept and delete cookies by adjusting your browser settings, but please note that refusing or deleting cookies may impact your browsing experience on the Site, or prevent you from using the Service.

We may also use programs that monitor network traffic, identify unauthorized access or access to nonpublic information, detect computer viruses and other software that might damage our computers or the network, and monitor and fine-tune our network's performance. Any such information is used only for the purpose of maintaining the security and performance of Oliver Wyman's networks and computer systems.

How Do We Use the Personal Information We Collect?

We will use the information provided by you in order to:

- **respond** to your inquiries regarding the Service
- **administer** the Site
- **maintain network security** and performance and protect against cyber-attacks
- **comply** with and enforce applicable laws, industry standards, and our own policies
- **verify your identity**
- **register** and service your online account
- **contact you** when necessary

Who Do We Share Your Data With?

We share or may share your personal information as follows:

- with **affiliates**
 - to enable them to provide services to you.
- as part of a **business transfer**
 - As we continue to develop our business, we might sell or buy assets. In such transactions, user information generally is one of the transferred business assets. Also, if either Oliver Wyman itself or any of Oliver Wyman's assets were acquired (including through bankruptcy proceedings), your personal information may be one of the transferred assets.

- to address **legal concerns**
 - Oliver Wyman may preserve, and has the right to disclose any information about you or your use of the Service, without your prior permission if Oliver Wyman has a good faith belief that such action is necessary to: (a) protect and defend the rights, property, or safety of Oliver Wyman or its affiliates, other users of the Service, or the public; (b) enforce the terms and conditions that apply to use of the Service; (c) respond to claims that any content violates the rights of third parties; (d) respond to claims of suspected or actual illegal activity; (e) respond to an audit or investigate a complaint or security threat; or (f) comply with applicable law, regulation, legal process, or governmental requests.
- with **your employer** (i.e., our Client) in relation to general relationship management and account administration needs

We will not disclose, share, sell, or otherwise use your personal information without your consent, except to the extent required by law, in accordance with your instructions, or as identified in this Privacy Notice. We may also share information that is not reasonably likely to identify you personally for any commercially legitimate business purpose.

What Steps Do We Take to Protect Your Information?

All information we collect in relation to the Service may be stored, and processed in the United States within Oliver Wyman-controlled databases. We restrict access to your personal information to employees of ours and our affiliates and to service providers who need to use it to provide the Service and our products or services. We have implemented physical, administrative, and technical safeguards to protect your personal information from unauthorized access. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our systems, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet.

How Long Do We Keep Your Information?

We will retain your personal information for as long as is necessary for the processing purpose(s) for which it was collected and other permitted purpose(s), including retention of personal information required by contract, law or regulation. Our retention periods are based on business, legal and regulatory needs.

Cross-Border Transfer of Personal Information

This Privacy Notice is provided in accordance with and subject to the law of the United States. If you access this Site from a location outside the United States, you agree that your use of this Site and the Service is subject to the terms of this Privacy Notice and the Terms of Use.

Transfers of data out of the European Economic Area (EEA). Residents of the EEA should note that, in order to provide our Site and the Service to you, we may send and store your personal information (also commonly referred to as “personal data”) outside of the EEA, including to the United States. Your personal information will be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the country in which you are located, whose data protection laws may be of a lower

standard than those in your country. We will, in all circumstances, safeguard personal information as set out in this Privacy Notice.

Where we transfer personal information from inside the EEA to outside the EEA, we are required to take specific measures to safeguard the relevant personal information. Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which are not subject to this approval (see the full list here http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), we will establish legal grounds justifying such transfer, such as MMC Binding Corporate Rules (**BCRs**), model contractual clauses, or other legal grounds permitted by applicable legal requirements. Our BCRs are a means of transferring personal information internationally within our group companies in compliance with applicable data protection legislation in the EEA. Our BCRs consist of both the Controller and Processor Standards.

For further information regarding how our BCR Standards operate, click [here](#). If you have specific questions or concerns you may contact our EU Data Privacy Officer, Mary Pothos, at GDPRLegal@mmc.com.

Rights of California Residents

Under California's "Shine the Light" law, Site visitors who are California residents may request and obtain a notice once a year about the personal information Oliver Wyman shared with other businesses for their own direct marketing purposes. Such a notice will include a list of the categories of personal information that was shared (if any) and the names and addresses of all third parties with which the personal information was shared (if any). The notice will cover the preceding calendar year. To obtain such a notice, please contact us as described below. In addition, under this law you are entitled to be advised how our Site handles "do not track" browser signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not honor Do Not Track requests at this time.

Accessing and Correcting Your Information

Keeping your information accurate and up-to-date is very important. Inaccurate or incomplete information could impact our ability to deliver the Service to you. Please let us know about any changes that may be required to your personal information using the contact information below.

Questions, Requests or Complaints

To submit questions or requests regarding this Privacy Notice or Oliver Wyman's privacy practices, please email us at OWGLegalandCompliance@oliverwyman.com.

This Privacy Notice was last updated on 1 January 2020.