



Privacy Notice for Aon Consulting South Africa (Pty) Ltd



Privacy Notice

1. Introduction

This Privacy Notice ("**Notice**") explains how Aon Consulting South Africa (Pty) Ltd hereinafter referred to as ACON makes use of the personal information collected about you in connection with the services. Throughout this Notice ACON may be referred to as "we", "us", "our" or "ACON".

2. Collecting Your Information

2.1 The information we collect from you as part of the "Scope of Work" (SOW) may include the following:

- a. basic personal details, such as your name, address contact details, company details;
- b. demographic details, such as information about your insurance requirements;
- c. certifications, and insurance details, such as existing and previous insurance policy details, previous claims history;
- d. financial information as it relates specifically to engagements with third-party vendors and suppliers and other financial data supplied to us to conduct our reviews and evaluations as it relates to your assets,

Photograph and/or images/footage captured/recorded on CCTV or other video systems when you visit our offices; and
- e. Photograph and/or images/footage captured/recorded on CCTV or other video systems when you visit our offices; and
- f. Data Analytics and risk profiling; claims details, such as information about any claims concerning your insurance policy;

2.2 You are required to provide any personal information we reasonably require (in a form acceptable to us) to meet our obligations in connection with the services we provide to you, including any legal and regulatory obligations. Where you fail to provide or delay in providing information, we reasonably require to meet these obligations, we may be unable to offer the services to you and/or we may terminate the services provided with immediate effect.

2.3 Where you provide personal information to Aon about third party suppliers and vendors that you outsource to, where appropriate, you should provide these suppliers and third-party vendors with a copy of this Notice beforehand or ensure they are otherwise made aware of how their information will be used by ACON.

2.4 In addition to collecting personal information from you directly, we may also collect personal information about you from other third parties, such as, insurers, underwriters, reinsurers,

previous brokers on record and data validation agencies and other professional advisory service providers. This information may be sourced prior to, and throughout the course of providing the services to you.

3. Processing Your Information

3.1 We will use the information we collect about you in connection with the services to:

- a. assess your application to receive the services;
- b. carry out due diligence, identity, sanctions where business is located outside of South Africa, data validation agency checks;
- c. evaluate risks relating to your Business. As it relates to prospective and existing insurance policies;
- d. offer, administer, and manage the services provided to you, including providing initial and renewal quotations and client care information;
- e. process your payment for the fees and any mid-term adjustments;
- f. investigate and settle claims or complaints in relation to Business Interruption and Claims
- g. trace debtors and recover any outstanding debt in connection with the services provided for credit control purposes;
- h. fulfil legal and regulatory obligations and monitor compliance with the same;
- i. perform analytics for risk modelling purposes and to analyse trends; and
- j. conduct market research and canvass your views about the services we offer to develop and improve our service offerings generally.

4. Legal Grounds for Processing

We rely on the following legal grounds to collect and use your personal information:

- a. **Performance of the service contract with you** : Where we offer the services or enter a contract with you to provide the services, we will collect and use your personal information where necessary to enable us to take steps to offer you the services, process your acceptance of the offer and fulfil our obligations in the contract with you , especially for the processing activities set out in sections 3(a), 3(b), 3(c), 3(d) and 3(e) of this Privacy Notice.
- b. **Legal and regulatory obligations** : The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations particularly for the processing activities set out in section 3(h) of this Privacy Notice.

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- c. **Insurance purposes Note**

: The collection and use of some aspects of your personal information, is necessary for consulting purposes. These purposes include advising on, arranging, underwriting or administer the insurance services, assessing and administering claims for exercising our rights or obligations in connection with the services.

 - d. **Legitimate interests,**

: The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, e.g., to operate our business, particularly where we offer other services that may be of interest to you or conduct market research to improve our services generally including for the processing activities set out in sections 3(b), 3(f), 3(g), 3(h), 3(i), 3(j) and 3(k) of this Notice. Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

 - e. **Consent**

: Where we rely on your consent to collect and use personal information specifically for the purpose of assessing risks, we may also share this information with other insurance market participants and third parties where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers, and vetting agencies.

Where we rely on your consent to collect and use your personal information, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided. However, where you refuse to provide information that we reasonably require providing the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.

Where you choose to receive the services from us you agree to the collection and use of your personal information in the way we describe in this section of the Notice.

 - f. **Publicly available**

: Where you have deliberately made the personal information public we can process such personal information, specifically for the purpose of assessing risks relating to your Business.
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5. Accuracy of Your Information

We rely on the availability of accurate personal information to provide the services to you and operate our business. You should therefore notify us of any changes to your personal information, particularly changes concerning your contact details, bank account details (where necessary), insurance policy details or any other information that may affect the proper management and administration of the services we provided to you.

6. Recipients of Your Information

We generally share your personal information with the following categories of recipients where necessary to offer, administer and manage the services provided to you:

- a. insurance market participants where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers, intermediaries, and loss adjusters. The insurance underwriter is the insurer that is underwriting your insurance policy and is named in your policy documentation. You should refer to the insurer's privacy notice on their website for further information about their privacy practices;
- b. data validation and other professional advisory agencies, where necessary
- c. public authorities, regulators, and government bodies, where necessary for us to comply with our legal and regulatory obligations;
- d. third party suppliers, where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions; and
- e. successors of the business, where Aon or the services are sold to, acquired by, or merged with another organisation, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Notice.

7. Overseas Transfers of Your Information

- 7.1 We operate on a global and worldwide basis, and we therefore reserve the right to transfer personal information about you to other countries including without limitation the United States, Netherlands, Israel, and Germany to be processed for the purposes outlined in the Notice. We may make such transfers to offer, administer and manage the services provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.
- 7.2 Where we collect personal information about you in the Republic of South Africa, we may transfer the information to countries outside the Republic of South Africa for the processing purposes outlined in this Privacy Notice. This may include transfers to countries that are considered to provide inadequate data privacy safeguards in line with the standard as expected by the Information Regulator of South Africa. In these instances, Aon has an intra-group data transfer agreement which regulates cross-border transfers of your personal information within the Aon Group, and which incorporates standard contractual clauses

approved by the Regulator. Where we transfer personal information to third parties located in countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as the aforementioned standard contractual clauses, where necessary, approved by the Regulator, as appropriate. Where necessary, we may implement additional technical, organizational, or contractual measures to ensure an adequate level of protection for your personal information. Where required, further information concerning these safeguards can be obtained by contacting us. In addition, if such personal information contains special personal information or personal information relating to children, we will obtain prior authorisation from the Information Regulator of South Africa prior to transfer of information if necessary.

8. Retention of Your Information

We retain appropriate records of your personal information to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you. In most cases we shall retain your personal information for no longer than is required under the applicable laws. We will keep your personal information for the period necessary to fulfil the purposes described in this Privacy Notice unless: (i) a longer retention period is permitted or required by law; (ii) ACON reasonably requires it for lawful purposes related to its functions or activities; (iii) it is required by a contract between us; or (iv) with your consent. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

9. Information Security

The security of your personal information is important to us, and we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws.

10. Your Information Rights

10.1 You have the following rights under applicable data privacy laws in respect of any personal information we collect and use about you:

- a. The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you, for a reasonable fee. We may and where applicable, must, refuse access to information in terms of the grounds for refusal of access to records set out in the applicable laws including the Promotion of Access to Information Act 2000.
- b. The right to request the correction of your personal information where it is inaccurate irrelevant, excessive, incomplete, misleading, or out of date or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
- c. The right to request the erasure, deletion, or destruction of your personal information, particularly where the continued use of the information is no longer necessary, and we have no other legal ground for processing the data.

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- d. The right to object to the use of your personal information, at any time, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information where the justification for that processing is that it is necessary for pursuing our legitimate interests or for the protection of your legitimate interests or where the processing is in the context of the processing of personal information for the purposes of direct marketing. If you raise an objection, such objection should be based on reasonable grounds relating to your situation, unless legislation provides for such processing.
 - e. The right to object to the use of your personal information for direct marketing purposes. See **section eleven (11)** below for further information.
 - f. The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed and you request that the information not be used until its accuracy is confirmed, the processing is unlawful, but you do not want it erased, deleted or destroyed; or it is no longer needed for the purposes for which it was collected for purposes of proof; or you request the transmission of the personal data into another automated processing system.
 - g. The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
 - h. The right to object to decisions involving the use of your personal information, which have been taken solely by automated means. See **section twelve (12)** below for further information.
 - i. The right to complain to the relevant data protection regulator about our processing of your personal information. In respect of the South African Information Regulator, you may contact the office by completing [POPIA form 5](#) and email it to POPIAComplaints@inforegulator.org.za.

10.2 It is important to note, however, that some of the rights described above in **Section 10.1** can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy laws, we will write to you to explain the reason for refusal (e.g., for compliance with a legal obligation, for the establishment, exercise or defence of legal claims or legal exemption). Where required, further information concerning these rights and their application can be obtained by contacting us.

11. Direct Marketing

We will use your personal information to send you direct marketing about other services that we feel may be of interest to you. Your personal information will only be used for direct marketing in accordance with applicable laws and regulations. We will always give you the opportunity to consent to the receipt of direct marketing at the point that you apply or register to receive the services and, should you already be considered an existing customer of Aon who receives direct marketing from us in relation to the same or similar services, we will give you the opportunity to refuse direct marketing on each occasion thereafter that you receive direct marketing communications from us (usually in the form of an “unsubscribed link”). You can also change your marketing preferences at any stage by contacting us. Please note that, even if you “Opt-Out” of receiving direct marketing communications, we may still send you service-related communications where necessary.

12. Automated Decisions

Where you apply or register to receive the service, we may carry out a real-time automated assessment to determine whether you are eligible to receive the service. An automated assessment is an assessment carried out automatically using technological means (e.g. computer systems) without human involvement. This assessment will analyse your personal information and will comprise a number of checks including validation of your previous claims' history. Where a decision is taken solely by automated means involving the use of your personal information, you have the right to challenge the decision and ask us to reconsider the matter, with human intervention. If you wish to exercise this right, you should contact us.

13. Complaints

If you wish to make a complaint about the way, we use your personal information you should raise this with us by contacting us in the first instance:

Information Officer:

Aon South Africa

1, The Place, Sandton Drive, Sandhurst,

Sandton 2196

email: comments1@aon.com

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the Information Regulator.

The Information Regulator (South Africa):

JD House

27 Stiemens Street

Braamfontein

Johannesburg

2001

Johannesburg email: infoereg@justice.gov.za

14. Changes to this Notice

This Notice is not contractual, and Aon reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that Aon collects and uses personal information about you. Any updates or changes to this Notice will be made available to you. You should periodically review this Notice to ensure you understand how we collect and use your personal information.



15. Contact Information

If you have any questions about the content of this Notice or the rights conferred to you under the applicable data privacy laws, you should contact us at the following address:

Information Officer
Aon South Africa
The Place 1 Sandton Drive, Sandhurst, Sandton
2196

email: comments1@aon.com

Policy Sponsor	Title
Exco Member	Chief Law and Compliance Counsel
Legal & Compliance	Compliance Manager

Version	Changes made	Date
0.1	Development of Privacy Notice.	June 2022
0.2	Review. Align with proposed changes and guidance from EMEA GPO.	September 2023
0.3	Review. General review align to changes proposed by Business. Delete license details noted at end of document.	June 2024

About Aon

Aon plc (NYSE: AON) exists to shape decisions for the better — to protect and enrich the lives of people around the world. Our colleagues provide our clients in over 120 countries with advice and solutions that give them the clarity and confidence to make better decisions to protect and grow their business.

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The information contained herein, and the statements expressed are of a general nature and are not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information and use sources, we consider reliable, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

www.aon.com

Aon Consulting South Africa (Pty) Ltd t/a ACON