

# Information on how WTW Collects and Processes Personal Data

**This notice informs you which data WTW collects about you and what the data is used for. Furthermore, you are informed of the legal basis for the processing of your personal data and of your rights.**

This document contains information on:

1. WTW in its role as data controller vis-à-vis you
2. WTW in its role as data processor vis-à-vis you
3. Which data WTW collects in addition to purpose and legal basis
4. Whom WTW passes the information on to
5. Security
6. For how long WTW retains your data
7. Your rights pursuant to the General Data Protection Regulation
8. Where WTW processes your data
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10. Data Protection Regulation

The Processing of personal data is regulated by the EU General Data Protection Regulation (“the General Data Protection Regulation”) and the Act on supplementary provisions to the regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“the Data Protection Act”) (collectively “the Data Protection Regulation”). See specific references to the Data Protection Regulation in item 8.

## 1 WTW in its role as data controller vis-à-vis you

WTW (hereinafter “we” or “us”) will personally counsel and advise you; this includes consulting on and establishing and maintaining personal insurance and/or pension agreements and consulting in case of claims and pension-related events. This could be in connection with insurances and pensions that have been set up through your employer and in connection with insurances and pensions set up by you personally.

To provide counselling on your pension, we may need to process data about your spouse/cohabitant and/or your child to among other things provide general counselling, beneficiaries and to establish individual child annuity or to establish insurance covers. This processing will be conducted on the basis of

a consent from your spouse/cohabitant or your child (however, consent is given by the parents regarding children under the age of 18).

We are data controller in connection with the processing of your personal data. Item 7 contains comprehensive information on how to contact us.

## 2 WTW in its role as data processor vis-à-vis you

Note that we may also process information about you on behalf of your employer and upon request from your employer. Your employer is data controller for that processing, and you should have received information from your employer to this regard.

### Specifically regarding our delivery of WTW APV – Powered by WOBA

Your employer may have entered into an agreement with us regarding the use of WTW APV – Powered by WOBA, which is a digital solution making it possible to conduct work assessments and ongoing risk management. In relation to the delivery of this service we process information about you, on behalf of your employer and upon request from your employer, with the aim of performing a work assessment and action plan and to outline your potential sickness absence (information about the specific reason for the sickness absence will not be processed, e.g. information about the work-related injury or the condition).

We will process information about your name, your e-mail address and your unit in the organization (e.g. department, team or area), and we will either receive the information from you or your employer. We will pass on the information to our sub-data processor, WOBA ApS, who i.a. delivers the platform where the information is entered and registered.

The information will be stored in accordance with our regular procedure for storage as stipulated in item 6.

## 3 Which information WTW collects in addition to purpose and legal basis

We collect information about you in order to counsel and advise you.

Most of the information used is collected from you personally but we may receive information from other sources, including your employer and insurance or pension company, as well as – contingent upon your specific consent – from your union or unemployment fund, employment centre, physician and other health professionals.

The information we request you to provide may be of such nature that the absence of such information may mean that we cannot offer to counsel and advise you.

We solely collect and process your personal data to the extent that an adequate legal basis is inherent in the Data Protection Regulation.

Depending on the consultation services and assistance you receive from us, it may be necessary to collect and process:

### Personal identification number

We will request you to provide your personal identification number and in separate from consent to your personal identification number being processed. The aim of this is to make a unique identification of you vis-à-vis your pension and insurance companies. At the time of drawing up insurance and pension, your personal identification number will be passed on to the pension and insurance companies in question.

The legal basis for processing your consent is worded in the General Data Protection Regulation article 6, subsection 1, point b, and the Data Protection Act section 11, subsection 2, number 2.

## Data concerning health

As a point of departure, we will not use your health-related data. The insurance and pension companies will often require health-related data and will inform you thereof separately. We can help you communicating your health-related data to the pension and insurance companies.

Exceptionally, we may need insight into your health-related data, including any information on loss of earning capacity; this data shall be used when consulting on insurance and pension agreements, including those instances where a pension or insurance company has declined your insurance or pension application with reference to your personal health data, and in connection with claims for which we act as an advisor to you. In these cases, we will always process your health-related data pursuant to your specific consent, which will be obtained in a separate document.

The legal basis for processing your consent is to be found in the General Data Protection Regulation article 6, subsection 1, point b, and article 9, subsection 2, point a.

## Data on union or unemployment fund affiliation

In case of claims we may need to collect data on your union or unemployment affiliation with the aim of advising you on how you stand regarding the specific union or unemployment fund and regarding the early retirement pay scheme. We will always process your data on union or unemployment fund affiliation pursuant to your specific consent, which will be obtained in a separate document.

The legal basis for processing your consent is to be found in the General Data Protection Regulation article 6, subsection 1, point b, and article 9, subsection 2, point a.

## Information from your employment centre

In case of claims we may need to collect information from your employment centre regarding measures for placing disabled persons in employment or early retirement. In these cases, we will always process your data from your employment centre pursuant to your specific consent, which will be obtained in a separate document.

The legal basis for processing your consent is to be found in the General Data Protection Regulation article 6, subsection 1, point b, and article 9, subsection 2, point a.

## Additional data

In addition to the data mentioned above, we will usually need to process, among other, the data categories listed below:

- Contact information, including name, address, phone number and e-mail.
- Data regarding your terms of employment, including job title, date of employment and seniority, salary and pension contribution, collective agreement affiliation, workplace and any secondments and data on severance, leave of absence etc.
- Data on your insurance and pension agreements, including coverages, payments, investment choices, beneficiaries, depot overview etc. This is both regarding insurances and pensions that have been set up by your employer, and insurances and pensions set up by yourself.
- Data on other income, assets and tax conditions as well as data on your civil status and household.

This data is required so that we can communicate with you and administer and deliver your consultation services. The legal basis for processing is to be found in the General Data Protection Regulation article 6, subsection 1, point b.

We may also need to process data on you and on agreements that you have entered into with us, so that we may fulfil our obligations pursuant to the Accountancy Act and the Money Laundering Act. The legal basis for this is to be found in the General Data Protection Regulation article 6, subsection 1, point c.

Finally, it may be necessary to process your data in order to establish, raise or defend legal claims, including if you or others take legal action against WTW. The legal basis for this is to be found in the General Data Protection Regulation article 6, subsection 1, point f, and article 9, subsection 2, point f.

If you have given your express consent to us sending you newsletters and information regarding other services, your contact details will be processed so that we may communicate with you. To ensure that newsletters and other marketing initiatives are relevant to you, we may individualise communication with you based on the other data we have on you and on your pensions and insurances. The legal basis for this is to be found in the General Data Protection Regulation article 6, subsection 1, point a, b and f. You may at any time opt out of receiving additional newsletters and marketing communications. Item 7 contains comprehensive information on how to contact WTW.

If we later wish to process your personal data for other purposes than those for which the personal data was collected, you will be informed of the other purpose prior to the processing, including the legal basis for the processing.

## 4 Whom WTW passes data on to

We pass on your personal data to the selected insurance and pension companies when establishing, amending, administering and discontinuing the insurance and pension relationship and when assisting in claims and other pension and insurance-related events. In cases of claims we will, contingent upon your consent, pass on your data to your union or unemployment fund as well as to your employment centre.

WTW is part of a group and may within a relevant framework and pursuant to legal basis in the Data Protection Regulation, pass on your data to other companies in the group for group-related and management-related purposes.

Furthermore, your personal data may be transferred to suppliers, collaboration partners or other third parties, who process data on behalf of WTW. When using such data processors, we make sure that a contractual agreement is entered into according to which the data processor may solely process personal data in accordance with our instructions and must establish sufficient organisational and security measures.

We only transfer personal data to data processors outside the EU and EEA if it has been suitably warranted that the protection level is sufficient, including EU Commission model contractual clauses, and only if such transfer is required in accordance with the instructions we have been given, or if such transfer is pursuant to your specific consent.

## 5 Security

We have established suitable technical and organisational measures to ensure that your personal data is not accidentally or illegally destroyed, lost, changed or devalued and to ensure that it does not fall into the hands of unauthorised persons, are infringed upon or in other manner processed in breach of the Data Protection Regulation.

## 6 For how long WTW retains your data

Personal data is deleted when storage no longer has a factual purpose.

Your personal data will be stored for up to 10 years after your resignation in the company, with who we have a collaboration, or up to 10 years after the termination of our collaboration with the company if storage is so deemed necessary for us to document delivery of our services or to establish, raise or defend legal claims against WTW. We act as data controller regarding this continued storage.

## 7 Your rights

When we process data about you, you have several rights pursuant to the Data Protection Regulation. This section informs you of your rights and how to avail of them.

### 7.1 Right of access

You have the right to ask us for information on, among other things, which categories of personal data we have on you and to which purposes they are processed, the recipients or categories of recipients, to whom the data has been or will be passed on to, information on the provenance of the data etc. You have the right to receive a copy of the personal data that we process on you. You can read more about your right of access in the General Data Protection Regulation article 15.

### 7.2 Right of rectification

You have the right to have incorrect personal data about you rectified. If you notice that the data, we have registered on you is erroneous, we request you to contact us in writing to have the data corrected. You can read more about your right of rectification in the General Data Protection Regulation article 16.

### 7.3 Right of deletion

In some cases, you have the right to have all or part of your personal data deleted by us, e.g. if you revoke your consent and no other legal basis exists to continue the processing. To the extent that your data needs to be processed further, e.g. for us to fulfil our legal obligations or to establish, raise or defend legal claims, we are not obliged to delete your personal data. You can read more about your right of deletion in the General Data Protection Regulation article 17.

### 7.4 Right to limit processing to storage

In certain cases, you have the right to limit the processing of your personal data to consist solely of storage, e.g. if you believe the data, we process about you, is erroneous. You can read more about your right to limit processing to storage in the General Data Protection Regulation article 18.

### 7.5 Right of data portability

In certain cases, you have the right to have handed over personal data, which you have given us, in a structured, commonly used and machine-readable format and if technically possible, you have the right to have this data transferred to another data controller. You can read more about your right of data portability in the General Data Protection Regulation article 20.

### 7.6 Right of objection

At all times, you have the right to object to how we process your personal data, which we collect and process. If you object to the processing, and given that the objection is justified, we are no longer allowed to process your personal data unless we can demonstrate legal grounds for continued processing. You

have an unconditional right to object to the processing of your data for the use for direct marketing. You can read more about your right of objection in the General Data Protection Regulation article 21.

### 7.7 Right to revoke consent

At all times, you have the right to revoke your consent. If you revoke your consent, you should be aware that we, under certain conditions, no longer will be able to provide you with the required consultation services. In such cases you will be informed thereof.

In some cases, we will be able to continue processing your personal data, regardless of whether you revoke your consent or not. This will be the case if there is another basis for processing your data other than your consent.

If you wish to revoke your consent, you must contact our Data Protection Officer, Anne Patricia Rehlsdorph ([annepatricia.rehlsdorph@wtwco.com](mailto:annepatricia.rehlsdorph@wtwco.com)).

### 7.8 Right of complaints

At all times, you have the right to submit a complaint to the Danish Data Protection Agency (Borgergade 28, 5., 1300 Copenhagen K) regarding the processing of your personal data. A complaint may also be submitted by e-mail [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk) or telephone +45 33 19 32 00.

### 7.9 How to avail of your rights

If you wish to avail of one or more of your rights, you must contact our Data Protection Officer, Anne Patricia Rehlsdorph ([annepatricia.rehlsdorph@wtwco.com](mailto:annepatricia.rehlsdorph@wtwco.com)).

## 8 Where WTW processes your data

### Location 1 (primary location)

Tangen 17, 1. 4.  
DK-8200 Aarhus N  
Denmark

### Location 2

Rundforbivej 303  
DK-2850 Nærum  
Denmark

### Location 3

Østre Havnepromenade 24, 2.  
DK-9000 Aalborg  
Denmark

### Location 4

Nupark 51  
DK-7500 Holstebro  
Denmark

**Backups are stored at the following locations**

Noris Network AG, DataCentre.DE, 200M Div. PIP D-85609 Aschheim, Klausnerstr. 30  
Munich  
Germany

and

Noris Network AG, Datacentre.DE 200M Div. PIP Thomas-Mann-Straße 16 – 20  
90471 Nuremberg  
Germany

**9 How to contact WTW**

If you have any questions regarding how we process your personal data or if you wish to avail of one or more of your rights, as described in item 6, you may contact us at:

Willis Towers Watson I/S

Company registration number: 13180695

Address: Rundforbivej 303, DK-2850 Nærum, Denmark

E-mail (Data Protection Officer, Anne Patricia Rehlsdorph): [annepatricia.rehlsdorph@wtwco.com](mailto:annepatricia.rehlsdorph@wtwco.com)

Telephone: +45 88 13 96 00

**10 Data Protection Regulation**

The processing of personal data is regulated by:

- THE EUROPEAN PARLIAMENT AND COUNCIL REGULATION (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 65/46/EC (General Data Protection Regulation) ("the General Data Protection Regulation"),
- Act on supplementary provisions to the regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("the Data Protection Act"), and
- Any other legislation, which implements or complements these rules.