

Updated: January 17, 2013

Aon Hewitt Privacy Statement

This Privacy Statement describes how Aon Hewitt collects, uses, and protects personal information it receives in the course of providing its services. At Aon Hewitt, your privacy is very important. We strive to protect the personal information under our control and to maintain the security and integrity of that information.

How Aon Hewitt Receives Personal Information

Generally, "personal information" is information that can be used to identify you. Most of the personal information we receive relates to your participation in the compensation and benefits programs offered by your employer. There are several ways that we could receive personal information:

- You might provide the information directly as a benefit plan participant by methods such as visiting our websites, telephoning our call center, or sending mail to our offices.
- Your employer might provide the information to us.
- Another service provider engaged by your employer (such as payroll processors, health plans, or mutual funds) that have a part in administering your employer's plans or programs might provide the information to us.

The types of personal information we receive may include:

- **Contact information**, such as name, address, phone number, and email address
- **Other personal information**, such as a government-assigned identifier (for example, Social Security Number, Social Insurance Number), date of birth, gender, and marital status
- **Employment information**, such as date of hire, employment status, pay history, tax withholding information, performance records, leave information, and date of termination
- **Benefit program participation and coverage information**, such as benefit elections, beneficiary information, claims information, benefit plan account numbers and balances, and date of retirement

Aon Hewitt's Commitment to Protecting Personal Information

We understand the responsibility that comes with being trusted with your personal information. We've implemented various security measures to protect the confidentiality of all the personal information we process, in both electronic and paper formats. We have policies, procedures, and controls to reduce the risk of unauthorized or accidental use, disclosure, or destruction of your personal information, and we train our employees on data security. Employees who have a job-related need to access your personal information are authorized to do so. In addition to these employees, Aon Hewitt limits access to your personal information to your employer and authorized service providers. We also require that our service providers enter into confidentiality agreements intended to protect your personal information.

Our commitment to protecting personally identifiable information also means that:

- We won't sell or lease your personal information to any third party.
- We won't use, transfer, or disclose your personal information to anyone outside of Aon Hewitt, unless authorized by you or your employer, except in connection with your employer's plans and programs, as required by law or legal process, in response to law enforcement requests, and as

necessary to protect the property, interests, and rights of Aon Hewitt or your employer.

- If we process your personal information, we will comply with the applicable requirements of a relevant data protection law [for example, "protected health information" will be processed consistent with the requirements of the Health Insurance Portability and Accountability Act (HIPAA), and the personal information of Canadian citizens will be processed consistent with the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA)].
- If your personal information is transmitted, used, stored, or otherwise processed outside of your country, Aon Hewitt will ensure that your personal information will be protected consistent with the data protection laws applicable to your personal information at the time of collection. Such protection shall include, as required, the signing of data transfer agreements.

Access and Corrections

Aon Hewitt is committed to respecting your rights to access your personal information. In many cases, you can access and update your personal information via our self-service websites or by telephoning our call center. Aon Hewitt is also committed to maintaining the accuracy of your personal information. In most cases, we rely on you and your employer to keep your personal information updated. If you need to update or correct your personal information, email dataprivacy@hewitt.com. In some circumstances, only your employer, and not Aon Hewitt, may have the authority to update or correct your personal information. If this information is the type that only your employer can update or correct, we'll forward your request to your employer.

Cookies and Other Technology

Cookies – Aon Hewitt collects information during your visit to an Aon Hewitt website through the use of cookie technology. By using this website, you agree that Aon Hewitt can place cookies on your device as described below and in our [Cookie Notice](#).

A cookie is a piece of programming information contained in a very small text file that's placed in your Internet browser or elsewhere on your hard drive. You can control acceptance of cookies by modifying your Internet browser preferences. You have the ability to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to block all cookies (including essential cookies), you may not be able to access all or part of our website and may be unable to use those services or engage in activities that require the placement of cookies.

Aon Hewitt uses cookies to distinguish you from other users of our website, provide you with a positive experience when you browse our websites, and to refine our content and personalize your experience. The use of this technology also helps Aon Hewitt compile aggregate statistics about usage of our websites. This information is **not** shared with any other party for any commercial purposes. For more detailed information about cookies, review our [Cookie Notice](#) or go to www.allaboutcookies.org (a third-party website).

Web Beacons – On some occasions, Aon Hewitt may use tracking technologies such as web beacons to collect information about your visits to Aon Hewitt websites. These are small electronic images embedded in web content or email messages and are ordinarily not visible to users. Web beacons enable Aon Hewitt to track pages and content accessed and viewed by users only on Aon Hewitt websites. The use of this technology helps Aon Hewitt provide you with a positive experience when you browse our websites, and it also helps refine our content and personalize your experience.

Website Logging – Aon Hewitt may also log information related to your website visit or mobile site visit.

This information can include:

- The address (or "URL") of the web pages you visit
- The browser you used to view our website
- Your Internet provider (IP) address
- The type of computer or device you used to view our website
- Any clicks on a "Like" button
- Statistics on page views

Chat – While browsing an Aon Hewitt website, you may be provided the opportunity to chat with a service center representative through chat-messaging technology. If you decide to chat with our service center representative, you have no obligation to share personal information. An alternative means to communicate with our service center will be provided to you upon request. In addition, your chat session may be stored.

Single Sign-On – While visiting an Aon Hewitt website, you may link to web pages and websites of Aon plc, Aon Hewitt, or its subsidiaries and affiliates in various jurisdictions that have their own specific privacy policies. The provisions of each specific privacy policy will prevail. Aon Hewitt may also provide a link to a website that is external to Aon Hewitt and therefore not operated or controlled by Aon Hewitt. Aon Hewitt is **not** responsible for the privacy practices or the content of such external websites, or the cookies that those websites deposit.

Notification of Updates

Aon Hewitt may update this Privacy Statement. If the changes are not material or do not affect previously provided information, we will simply post the revised Privacy Statement on our websites. If the changes are material in the way we treat your personal information, we will provide notice on this website before we make such a change. We encourage you to periodically review our Privacy Statement so that you'll always know how we protect your personal information.

Contact Information

If you have any questions or concerns about Aon Hewitt's use of your personal information or about this Privacy Statement, you can email dataprivacy@hewitt.com.