

Information on how WTW handles the General Data Protection Regulation

Pursuant to the General Data Protection Regulation (GDPR), WTW is required to enter into a Data Processing Agreement with you, which will regulate how we process the personal data that we receive from you and process on your behalf.

Is WTW data controller or data processor?

WTW takes on various roles regarding data processing dependent on whether we advise you as a company or your employees.

1 Company consultancy

When we put a pension agreement out to tender and implement the scheme, we receive your personal data, which we will pass on to the relevant pension and insurance companies. During this process we act as your **data processor** as we process the data according to your instructions and interests.

When receiving personal data from you, we assume that you have the legal authority to pass on the personal data to us.

2 Employee consultancy

When we advise your employees, we act as your **data controller**, since we collect personal data directly from the employee as part of the consultancy to deliver our own service: employee consultancy. In this connection, we will ask the employee to give his/her consent to us processing the employee's personal data, including us passing on the personal data to the pension and insurance companies where it is relevant.

We will ask your employees to sign a declaration of consent, when we are in contact with them. If we are to assist an employee in a specific case or dispute against the pension or insurance company and in that connection need to receive specific personal data from the employee (e.g. health data), the employee will be presented with an extended declaration of consent stating how we may use the data in our work of counselling and assisting the employee.

Our website contains further information on how we process their personal data.

The role of the pension and insurance companies

The pension and insurance companies do not act as data processors on behalf of you as a client. The pension and insurance companies process the received data in order to deliver an independent service to you and will therefore be deemed data controllers with regard to the personal data they receive from you.

You and the pension/insurance company are two independent parties, who have entered into an agreement on pension or insurance. Therefore, in order to establish and fulfil the agreement, you send personal data to the pension/insurance company. The data is used for a new and 'own' purpose: The conclusion of an insurance agreement pursuant to the terms laid out by the pension/insurance company.

Therefore, it is not necessary for you to enter into a data processing agreement with the specific pension/insurance company.

Establishment of data processing agreement

WTW acts as data processor in relation to you and therefore we must enter into a data processing agreement, which has been enclosed for your signature.

If you have any questions regarding the data processing agreement, please feel free to contact:

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Please note that you are required to ensure that you have the legal authority to pass on personal data to us. We will not verify whether this authority is in place.

The rights of data subjects

The General Data Protection Regulation provides the data subject (the individual) with a number of specific rights. We have produced an information letter for the data subjects, explaining how we process their personal data and their rights in relation hereto, including how to send a request for access, rectification and erasure, which has been enclosed.

You are welcome to hand out the information letter to the employees, whose personal data we will receive from you. WTW will make sure to send the information letter to those of your employees with whom we have direct contact.

Secure communication

It is important that communication is secure and in compliance with industry standards, when we exchange personal data with you and your employees.

Currently, we have two different options for exchanging information with you via secure connections: Encrypted e-mail and e-Boks.

1 Use of encrypted e-mail

a. TLS encryption

Transport Layer Security (TLS) is a protocol providing security and data integrity between two communication applications. TLS is the most widely used security protocol today. WTW uses TLS 1.2.

WTW sends all e-mails via TLS as standard procedure. All e-mails will be sent securely via TLS if the recipient's e-mail system supports this. If the recipient's e-mail system does not support TLS, e-mails will be sent without TLS encryption via standard e-mail.

The same is applicable if you send a TLS encrypted e-mail to WTW. We will receive it securely as WTW's e-mail system supports TLS encryption by default.

To ensure that TLS encryption is always being used, it is possible to establish a permanent TLS tunnel between WTW and you. A permanent solution is easy to set up and only requires a minimal amount of information and configuration at both your end and ours. If you are interested in this solution, you are welcome to contact your daily contact at WTW, who will forward your request to our IT support.

b. Encryption in Outlook

WTW also uses the possibility of encrypting e-mails in Outlook.

2 Communication via e-Boks

e-Boks is a secure communication solution that can be used by companies as well as private individuals. However, it requires that you, as a company, has signed up to the e-Boks solution and configured a permission to receive mail from WTW.

As a general rule, we always recommend setting up a permanent TLS tunnel solution between WTW and you, as this is the most user-friendly solution in practice and as it ensures the desired protection.

Secure communication between WTW and the insurance and pension companies

We use secure communication solutions when exchanging personal data with the insurance and pension companies by either using a private portal solution or encrypted e-mails.

Data protection policy

You can our data protection policy on our website www.wtwco.com. You are always welcome to contact us, if you have any questions concerning our processing of personal data.

Best regards,



Anne Patricia Rehlsdorph

Assistant General Counsel and Data Protection Officer (DPO)