

UK Binding Corporate Rules Summary (Controller)

Introduction

Marsh McLennan (“**MMC**”) has approved EU Binding Corporate Rules (“**EU BCR**”) which are a means of transferring personal data internationally within the Company group in compliance with applicable data protection legislation in the European Economic Area (“**EEA**”). MMC’s EU BCR consist of both Controller and Processor Standards. A copy of MMC’s EU BCR is available here - [BCR-C](#) and [BCR-P](#).

MMC has entered into the UK BCR Addendum to the approved EU BCR. The UK BCR Addendum is a formal legal mechanism which extends the scope of the EU BCR to include transfers of personal data from the UK. Together, the EU BCR and the UK BCR Addendum form MMC’s UK BCR (“**UK BCR**”).

The purpose of this UK BCR-C summary is to provide information to individuals whose personal data is transferred under the UK BCR-C so that they know how their information is processed, what rights they have under the UK BCR-C and how to enforce them.

References to “**MMC’s BCR**” is a reference to the EU BCR and UK BCR.

Contact details for queries about MMC’s UK BCR	All queries about MMC’s UK BCR, EU BCR or about MMC Privacy matters generally should be directed to privacy@mmc.com .
Description of data transfers covered by MMC’s UK BCR-C	A description of the data transfers covered by MMC’s BCR can be found in “ Section 1 – Background and Actions ” of the EU BCR-C. In summary: <ul style="list-style-type: none"> - MMC’s BCR apply to all MMC entities that have entered into an intra-group agreement and agreed to be bound by the BCR. These entities are referred to in the BCR as “Group Members”. - MMC’s BCR-C apply to all Group Members and their employees worldwide. A list of the current Group Members and the countries where personal data is transferred to under MMC’s BCR-C can be accessed here.

	<ul style="list-style-type: none">- The UK-based MMC Group Members are:<ul style="list-style-type: none">- MMC UK Group Limited- Hamilton Bond Limited- Jelf Insurance Brokers Limited- Marsh Corporate Services Ltd- Marsh Ltd- Marsh Services Limited- Mercer Consulting Limited- Mercer Ltd- Sedgwick Financial Services Limited- Sedgwick Noble Lowndes (UK) Limited- Sedgwick Ulster Pension Trustees Limited- Darwin Technologies Holding Limited- Darwin Technologies Limited- Nera UK Limited- Oliver Wyman Ltd- Guy Carpenter & Co. Ltd- JLT Management Services Limited - MMC's BCR-C establish obligations concerning the processing of UK personal data by Group Members for their own purposes, acting as a Controller. - as defined in Section 1 – Introduction of MMC's BCR-C, processing shall include any operation that the Company performs on personal data, whether manually or by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. - the BCR apply to all UK personal data that is processed by (a) Group Members acting as a Controller in the course of interacting with and servicing: (i) prospective and existing clients; (ii) vendors, supplier management business partners and other third parties with whom Group Members interact; (iii) company employees and employee family members/dependants/nominated emergency contacts; and (iv) plan participants or employees of, or third parties named in relation to clients and the administration and management of relations with the Individuals mentioned above; and (b) Group Members as a Processor on behalf of another Group Member as a Controller.
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	<ul style="list-style-type: none"> - the categories of UK personal data processed under the UK BCR-C includes: (i) in relation to prospective and existing clients or employees, plan participants or employees of clients: contact names; addresses; telephone numbers; email addresses; date of birth; national identifier; health information; details related to insurances or risks insured; payment information; information necessary for the provision of insurance or consulting products or services; information related to other services requested from or provided by the Group Members; (ii) in relation to third parties named in relation to clients (such as client employees, plan participants or customers of clients (for example, individuals named in insurance claims)): names; addresses; date of birth; national identifier; details of involvement in risks insured; information necessary for the provision of insurance products to clients; (iii) in relation to employees or Individuals insured (past, existing or prospective): names; addresses; gender; date of birth; details of next of kin; contact telephone numbers; email addresses; educational history and qualifications; previous job history; references; driving licence; passport information; photo; management metrics, appraisals and feedback; correspondence and internet use; bank account details; national identifier; health information (for sickness reporting purposes); salary and bonus details; benefit package; pension contribution details; travel details; expense details; information on membership of private health schemes; disciplinary information; criminal convictions data; trade union membership; racial or ethnic origin; religious or philosophical beliefs; (iv) in relation to employee family members/dependants/nominated emergency contacts: names; relationship to employee; contact information; and (v) in relation to contractors, suppliers, vendors, business partners and other third parties: company contact information relating to suppliers including company names; contact names; professional addresses and telephone numbers; details of goods and services provided; national identifier; bank account and payment details; email address. - Each UK-based Group Member may exchange personal data (as described above in the section “Description of data transfers covered by MMC’s UK BCR-C”) with any of the BCR Group Members listed in the BCR Group Members list as referenced above.
<p>List of countries where personal data is transferred to under the UK BCR-C</p>	<p>The BCR Group Members list, found here, includes details of the countries where personal data is transferred to under MMC’s BCR.</p>

<p>MMC's UK BCR – What is the Exporting Entity model?</p>	<p>MMC operates an Exporting Entity model, whereby each UK based BCR Group Member, is distinctly liable for the personal data (and any breaches thereof) that they export from the UK to non-UK BCR Group Members.</p> <p>"Exporting Entity" means a Group Member established in the UK that is Processing UK personal data as a controller and transferring such personal data to an Importing Entity under the BCR-C.</p> <p>"Importing Entity" means a Group Member established outside the UK receiving UK personal data from an Exporting Entity under the BCR-C.</p> <p>Data subjects seeking legal redress may ascertain which Exporting Entity is responsible for processing their personal data by reaching out to the MMC business with which they have a business relationship or by contacting privacy@mmc.com. Queries will be managed directly by a member of the Privacy Centre of Excellence, in consultation with the relevant entity as determined by the nature of the services provided to the individual and their relationship with MMC.</p> <p>Further information on making a complaint can be found below in the section <i>"How to complain to MMC Group Members and/or the Information Commissioner's Office about MMC's BCR-C"</i>.</p>
<p>The rights of individuals whose personal data is transferred under the UK BCR-C, including third party beneficiary rights, and the means to exercise those rights.</p>	<p>The rights of individuals whose personal data is transferred under the MMC's BCR are as described in the following sections of the EU BCR:</p> <ul style="list-style-type: none"> • Section C – Third Party Beneficiary Rights • Appendix 1 - Individuals' Rights Request Procedure <p>In summary, an individual making a valid request to the Company is entitled to:</p> <ul style="list-style-type: none"> • access a copy of UK personal data held about them and certain other details regarding the processing of their UK personal data; • request rectification, erasure, restriction or completion of their UK personal data, which is shown to be inaccurate or incomplete and in certain circumstances, raise an objection regarding the processing of their UK personal data; • exercise their right to data portability in relation to their UK personal data;

	<ul style="list-style-type: none"> • not be subject to a decision based solely on automated processing, including profiling, which produces legal or similar significant effects; • object to the use of such UK personal data for direct marketing purposes and we honour all such opt-out requests. <p>Requests should be emailed to mmcbcr@mmc.com with the subject line: "<i>BCR Rights Request</i>".</p>
<p>How to complain to MMC BCR Group Members and/or the UK Information Commissioner’s Office about MMC’s UK BCR-C?</p>	<p>Appendix 5A and Appendix 5B of the EU BCR-C provide details of MMC’s complaint handling protocol. Individuals, including colleagues, whose UK personal data is processed under the UK BCR-C may submit a complaint or query to mmcbcr@mmc.com. We are committed to promptly and appropriately investigating each privacy complaint submitted. An individual may:</p> <ul style="list-style-type: none"> • raise a complaint and/or bring proceedings where there is a breach of these Principles by Group Members; • bring proceedings against the Exporting Entity if there is a breach by the Importing Entity; or • make a complaint to the Information Commissioner’s Office (“ICO”) – for more information visit the Information Commissioner’s Office website here or contact the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113 Textphone: 01625 545860 Monday to Friday, 9am to 4:30pm <p>In alignment with the approach under our EU-BCR, MMC has appointed a UK back-stop entity (MMC Group UK Limited) that accepts liability to data subjects (and for Processor BCR, to Third Party Exporters) for all breaches of the UK BCR Addendum by any Non-UK BCR Group Member in the event that any Group Member cease to exist in law, has factually disappeared, or has become insolvent.</p>
<p>How to bring a claim in the UK courts against MMC for redress and, where appropriate, compensation for a breach of the UK BCR Addendum by MMC UK Group and any Non-UK BCR Group Member</p>	<p>The individual court systems provide guidance on how to bring a claim in England and Wales, Scotland and Northern Ireland. In addition, Citizens Advice provides information on taking legal action in England and Wales, Scotland and Northern Ireland. You can also find further information here - England and Wales, Scotland and Northern Ireland.</p>

UK Binding Corporate Rules Summary (Processor)

Introduction

Marsh McLennan (“**MMC**” or “**Company**”) has approved EU Binding Corporate Rules (“**EU BCR**”) which are a means of transferring personal data internationally within the Company in compliance with applicable data protection legislation in the European Economic Area (“**EEA**”). MMC’s EU BCR consist of both Controller and Processor Standards. A copy of MMC’s EU BCR is available here - [BCR-C](#) and [BCR-P](#).

MMC has entered into the UK BCR Addendum to the approved EU BCR-P. The UK BCR Addendum is a formal legal mechanism which extends the scope of the EU BCR-P to include transfers of personal data from the UK. Together, the EU BCR-P and the UK BCR Addendum form MMC’s UK BCR (“**UK BCR-P**”).

The purpose of this UK BCR summary is to provide information to individuals whose personal data is transferred under the UK BCR-P so that they know how their information is processed, what rights they have under the UK BCR-P and how to enforce them.

References to “**MMC’s BCR**” is a reference to the EU BCR and UK BCR.

Contact details for queries about MMC’s UK BCR	All queries about MMC’s UK BCR, EU BCR or about MMC Privacy matters generally should be directed to privacy@mmc.com .
Description of data transfers covered by MMC’s UK BCR-P	A description of the data transfers covered by MMC’s BCR can be found in “ Section 1 – Background and Actions ” of the EU BCR-P. In summary: <ul style="list-style-type: none"> - MMC’s UK BCR-P apply to all MMC entities that have entered into an intra-group agreement and agreed to be bound by the BCR. These entities are referred to in the BCR as “Group Members”. - MMC’s UK BCR-P apply to all Group Members and their employees worldwide. A list of the current Group Members and the countries where personal data is transferred to under MMC’s BCR can be accessed here.

	<ul style="list-style-type: none">- The UK-based MMC Group Members are:<ul style="list-style-type: none">- MMC UK Group Limited- Hamilton Bond Limited- Jelf Insurance Brokers Limited- Marsh Corporate Services Ltd- Marsh Ltd- Marsh Services Limited- Mercer Consulting Limited- Mercer Ltd- Sedgwick Financial Services Limited- Sedgwick Noble Lowndes (UK) Limited- Sedgwick Ulster Pension Trustees Limited- Darwin Technologies Holding Limited- Darwin Technologies Limited- Nera UK Limited- Oliver Wyman Ltd- Guy Carpenter & Co. Ltd- JLT Management Services Limited - MMC's BCR-P establish our obligations concerning the processing of UK personal data collected by a Client or by another Group Member (also referred to as a Controller). - MMC's UK BCR-P shall cover all processing including any operation that the Company performs on personal data, whether manually or by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. - MMC's UK BCR-P apply to all UK personal data that is processed by Group Members when acting as a Processor for and on behalf of a Controller in the course of (i) interacting with and servicing prospective and existing clients and (ii) providing clients risk and insurance services, including risk management services (risk advice, risk transfer, and risk control and mitigation solutions), and insurance and reinsurance broking and services; and consulting services, including health, retirement, pension administration, talent and investments services and products, and specialised management and economic consulting services.
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	<ul style="list-style-type: none"> - The categories of UK personal data processed under the UK BCR-P includes: (i) in relation to prospective and existing clients or employees of clients: family names, given names, titles, employer and job title, e-mail address, phone number contact names; (ii) in relation to customers of clients and other third parties named in relation to clients (to the extent that access to such personal data is required to provide services): family names, given names, titles, employer and job title, information relating to the service provided (for example, retirement dates, benefits provision). - Each UK-based Group Member may exchange personal data (as described above in the section “Description of data transfers covered by MMC’s UK BCR-P”) with any of the BCR Group Members listed in the BCR Group Members list as referenced above.
<p>List of countries where personal data is transferred to under the UK BCR-P</p>	<p>The BCR Group Members list, found here, includes details of the countries where personal data is transferred to under MMC’s BCR.</p>
<p>MMC’s UK BCR – What is the Exporting Entity model?</p>	<p>MMC operates an Exporting Entity model, whereby each UK based BCR Group Member, is distinctly liable for the personal data (and any breaches thereof) that they export from the UK to non-UK BCR Group Members.</p> <p>Data subjects seeking legal redress may ascertain which Exporting Entity is responsible for processing their personal data by reaching out to the MMC business with which you have a business relationship or by contacting privacy@mmc.com. Queries will be managed directly by a member of the Privacy Centre of Excellence, in consultation with the relevant entity as determined by the nature of the services provided to the individual and their relationship with MMC.</p> <p>Further information on making a complaint can be found below in the section <i>“How to complain to MMC Group Members and/or the Information Commissioner’s Office about MMC’s BCR-P”</i>.</p>
<p>The rights of individuals whose personal data is transferred under the UK BCR-P, including third party beneficiary rights, and the means to exercise those rights.</p>	<p>The rights of individuals whose personal data is transferred under the MMC’s UK BCR-P are as described in the following sections of the EU BCR-P:</p> <ul style="list-style-type: none"> • Section C – Third Party Beneficiary Rights • Appendix 1 - Individuals’ Rights Request Procedure <p>In summary, individuals may enforce their rights under the UK BCR-P by:</p>

	<ul style="list-style-type: none"> • making a complaint to the Information Commissioner’s Office (“ICO”); • bringing proceedings against the UK Group Member in the UK courts; • seeking appropriate redress from the UK Group Member including the remedy of any breach of the Rules listed in Section C, and where appropriate, compensation from the UK Group Member for any damage, whether material or non-material, suffered as a result of a breach of those Rules by: (i) any non-UK Group Member; or (ii) by any Third Party Sub-Processor which is established outside the UK and which is acting on behalf of a Group Member, in accordance with the determination of the court or other competent authority. <p>In alignment with the approach under our EU-BCR, MMC has appointed a UK back-stop entity (MMC Group UK Limited) that accepts liability to data subjects who may enforce the provisions under Section C for all breaches of the UK BCR Addendum by any Non-UK BCR Group Member in the event that any Group Member cease to exist in law, has factually disappeared, or has become insolvent.</p>
<p>Responsibility towards a third-party controller.</p>	<p>A third party controller that has entered into a contract with a Group Member that incorporates MMC’s UK BCR-P may enforce the UK BCR-P through the courts, where permitted by law and subject to the terms of the contract with the Client, against: (i) any Group Member processing personal data on behalf of that Client in respect of a breach of the UK BCR-P caused by that Group Member or any Sub-Processor established outside of the UK; and (ii) the Group Member that exported such Personal Information to the Group Member in (i).</p>
<p>How to complain to MMC BCR Members and/or the UK Information Commissioner’s Office about MMC’s UK BCR-P?</p>	<p>Appendix 5A and Appendix 5B of the EU BCR-P provide details of MMC’s complaint handling protocol under the UK BCR-P. Individuals, including colleagues, whose UK personal data is processed under the UK BCR may submit a complaint or query to mmcbcr@mmc.com. We are committed to promptly and appropriately investigating each privacy complaint submitted.</p> <p>An individual may send a complaint to any of the following:</p> <ul style="list-style-type: none"> • the Company manager responsible for the relationship with the supplier, client or third party pursuant to which the UK personal data was processed; • by email to: to mmcbcr@mmc.com with the subject line: "BCR Complaint";

	<ul style="list-style-type: none"> • in writing to: Marsh & McLennan Ireland Limited, (FAO: Chief Privacy Officer and DPO (UK & Europe), Marsh House, 25-28 Adelaide Road, Dublin 2; • to the Company's Ethics & Compliance Line, a free, secure and confidential resource, accessible online or by telephone 24 hours a day, 7 days a week, worldwide. Detailed instructions for access can be found here: www.EthicsComplianceLine.com; • if the matter relates to UK personal data that has been exported outside the UK, to the Group Member responsible for exporting such UK personal data. • the ICO – for more information visit the Information Commissioner’s Office website here or contact the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Telephone: 0303 123 1113 Textphone: 01625 545860 Monday to Friday, 9am to 4:30pm
<p>How to bring a claim in the UK courts against MMC for redress and, where appropriate, compensation for a breach of the UK BCR Addendum by MMC UK Group and any Non-UK BCR Member</p>	<p>The individual court systems provide guidance on how to bring a claim in England and Wales, Scotland and Northern Ireland. In addition, Citizens Advice provides information on taking legal action in England and Wales, Scotland and Northern Ireland. You can also find further information here - England and Wales, Scotland and Northern Ireland.</p>