

# WILLIS TOWERS WATSON

## APPLICANT PRIVACY NOTICE

### Willis Towers Watson

**PURPOSE OF THIS NOTICE:** This Applicant Privacy Notice (the “**Applicant Notice**”) describes how Willis Towers Watson (“**Willis Towers Watson,**” “**we,**” “**our**” or “**us**”) collects and uses certain personal information relating to external job applicants and candidates (“**Applicants**”) for positions with us is intended to satisfy our applicable notice requirements under applicable data protection laws including the General Data Protection regulation and the California Consumer Privacy Act (“**CCPA**”).

**SCOPE OF THIS NOTICE:** This Applicant Notice applies to the personal information that we collect from and about Applicants, in the context of reviewing, assessing, considering, managing, storing or processing their applications or otherwise considering them for a position with us.

***What is personal information?*** In this Applicant Notice, “personal information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

***What isn’t covered by this notice.*** This Applicant Notice does not address or apply to our collection of personal information that is not subject to data protection laws, such as consumer credit reports and background checks, publicly available data lawfully made available from a state or federal government records, or other information that is exempt under data protection laws e.g. the CCPA.

This Applicant Notice also does not apply to the personal information we collect from employees (which is subject to a separate privacy notice), or the personal information that we collect from customers or end users of Company’s products and services, including Applicants, in the context of their personal use of Company products and services (which is subject to our Global Website Privacy Notice at <https://www.willistowerswatson.com/en-US/Notices/global-website-privacy-notice>).

***Are our practices the same for all Applicants?*** The categories of personal information we collect, and our use of personal information may vary depending upon the position(s) or location, as well as the associated qualifications and responsibilities. The information in this Applicant Notice is intended to provide an overall description of our collection and use of personal information about Applicants.

**CATEGORIES OF PERSONAL INFORMATION COLLECTED:** We will collect the following categories of personal information about Applicants directly from you and other sources:

<b>Name, Contact Info and other Identifiers:</b> identifiers including, but not limited to, a real name, alias, postal address, unique personal identifier, online identifier, email address, social security number, passport number, or other similar identifiers.
<b>Protected Classifications:</b> characteristics of protected classifications under California or federal law including, but not limited to, race, color, sex, age, religion, national origin, disability, and citizenship status.
<b>Audio, Video and other Electronic Data:</b> audio, electronic, visual, or similar information such as interview audio recordings.
<b>Employment History:</b> professional or employment-related information.
<b>Education Information:</b> information about education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
<b>Work Authorisation Status.</b>

<p><b>Personal Information relating to new hire creation after offer acceptance</b> information that we are required to collect to comply with and fulfil our legal obligations e.g. National Identifier, Date of Birth, Citizenship, Bank Account Information, and Tax Related Information, Work Authorization Details.</p>
<p><b>Username and Password for your Talent Network Account or the Careers Site</b> (depending on your location, different online portals are available for applying for roles) and all information you submit through that account.</p>
<p><b>Any other information you choose to provide:</b> e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships.</p>
<p><b>Information relating to references:</b> If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to ensure that the individual agrees to you doing so prior to providing their information to us.</p>
<p><b>Sensitive personal information:</b> In some countries we ask for information regarding the ethnic origin, gender, and disability of our applicants for equal opportunity monitoring purposes.</p>
<p><b>Other sources:</b>                  References and background checks which may include information about your performance, skills, attitude and personal attributes provided by your references;                  Criminal records (where relevant for certain roles), credit reports and immigration information from information available on public record or obtained through background check providers;                  and                  Information about your identity, experience and suitability for a particular role from your recruitment agency, temporary staffing agency or where applicable, your current employer.</p>

**PURPOSES FOR COLLECTING AND USING PERSONAL INFORMATION:** Generally, we will use the above categories of personal information for the following purposes:

<p><b>Recruiting, Hiring and Managing, Evaluating and Communicating with Applicants.</b> To review, assess, recruit, consider or otherwise manage applicants, candidates and job applications, including:</p> <ul style="list-style-type: none"> <li>• To process your application including scheduling and conducting interviews</li> <li>• Identifying candidates, including by working with external recruiters</li> <li>• Reviewing, assessing and verifying information provided, to conduct criminal and background checks, and to otherwise screen or evaluate Applicants’ qualifications, suitability and relevant characteristics</li> <li>• Extending offers, negotiating the terms of offers, and assessing salary and compensation matters</li> <li>• Satisfying legal and regulatory obligations</li> <li>• Communicating with Applicants regarding their applications and about other similar position(s) for which they may be interested including future professional opportunities at Willis Towers Watson via Talent Network;</li> <li>• Maintaining Applicant personal information for future consideration</li> <li>• In support of our equal opportunity employment policy and practices</li> <li>• Providing insights into working at Willis Towers Watson and thought leadership content from our business</li> <li>• To create your Employee Profile with Willis Towers Watson after offer acceptance</li> </ul>
<p><b>Security and Monitoring.</b> In order to monitor and secure our resources, network, premises and assets, including:</p> <ul style="list-style-type: none"> <li>• Monitoring for, preventing and investigating suspected or alleged misconduct or violations of work rules</li> <li>• Monitoring for, preventing investigating, and responding to security and privacy incidents</li> <li>• Providing and managing access to physical and technical access controls</li> <li>• Monitoring activities, access and use to ensure the security and functioning of our systems and assets</li> <li>• Securing our offices, premises and physical assets, including through the use of electronic access systems and video monitoring</li> </ul>
<p><b>Auditing, Accounting and Corporate Governance.</b> Relating to financial, tax and accounting audits, and audits and assessments of our business operations, security controls, financial controls,</p>

<p>or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.</p>
<p><b>Special arrangements:</b> If you supply sensitive personal information to us, we will process this information in accordance with the law, and only for the purposes for which you have disclosed it (for example, to make special arrangements to accommodate a disability or religious beliefs or to promote diversity in the workplace). If you would like to request a reasonable adjustment or accommodation to assist you in the application process, please do so in the relevant field during the application process.</p>
<p><b>Defending and Protecting Rights.</b> In order to protect and defend our rights and interests and those of third parties, including to manage and respond to employee and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.</p>
<p><b>Compliance with Applicable Legal Obligations.</b> Relating to compliance with applicable legal obligations (such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, Social security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance.</p>
<p><b>Human resources management:</b> If we hire you, personal information we collect in connection with your application and Talent Network account may be incorporated into our human resources system and may be used to manage the new-hire process; any such information may become part of your employee file and may be used for other employment-related purposes.</p>
<p><b>Analytics:</b> To run analytics on job descriptions and the effectiveness of job postings.</p>

**LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION:** We must have a legal basis to process your personal information. In most cases, we will process your personal information on one of the following legal bases:

<p><b>Legal Obligations:</b> to fulfil our contractual obligations to you in connection with your employment contract with us; and to comply with our legal obligations for example obtaining proof of your right to work status to enable us to meet relevant obligations, health and safety obligations that we must comply with as your employer or to a third party (e.g. the taxation authorities);</p>
<p><b>Legitimate interest:</b> to meet our legitimate interests, for example to conduct the recruitment process efficiently and fairly, to manage our employees effectively. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.</p>
<p><b>Consent:</b> On occasion, we may obtain your explicit consent to collect and use certain types of personal information, for example when we are required to do so by law or if candidates ask us to pass their details to a third party for recruitment purposes. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.</p>
<p><b>Processing is Necessary:</b> Processing is necessary for the purposes of WTW carrying out obligations in the field of recruitment and employment which is authorised by country specific legislation. For example, in certain countries where we collect ethnicity personal information to ensure we comply with our obligations not to discriminate on the basis of race.</p>

**DISCLOSURE OF PERSONAL INFORMATION**

Willis Towers Watson may share personal information with affiliates that are involved in

evaluating candidates for a given position, and in particular with the employing entity that is considering your application (the name of this entity will be provided to you as part of the job description or other information provided to you about the role). These affiliates will process your personal information in accordance with this privacy notice. We will make the information available to personnel with a business need to know the information, including personnel in the recruiting, human resources and information technology departments, and in the department responsible for the position for which you are applying.

Willis Towers Watson may share personal information with our third-party service providers who provide services such as hosting and operating the Careers Site, recruiting assistance, background check processing, and similar services.

Willis Towers Watson also may share personal information as we believe to be necessary or appropriate to any court, regulator, law enforcement agency, government body or professional body where required under applicable law, including laws outside your country of residence, where necessary to comply with legal process or to protect or enforce the rights, privacy, safety or property of Willis Towers Watson, our clients, affiliates or third parties.

Willis Towers Watson may transfer information to a potential buyer, investor or business partner in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

**DATA RETENTION**

We will retain your personal information until the position you are applying for has been filled. If your application is successful, your personal information will form part of your employment file and will be stored in accordance with our Employee Privacy Notice. If your application is unsuccessful, we will retain your personal information in accordance with our retention policy for a period of time that enables us to:

Check our records should you apply for another role with us.
Contact you should another role arise that you may be interested in (unless you ask us not to do this).
Comply with record retention requirements under the law.
Defend or bring any existing or potential legal claims.
Deal with any queries or complaints you may have.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

**PASSIVE INFORMATION COLLECTION: COOKIES AND SIMILAR**

**TECHNOLOGY.** We and our service providers may use “cookies” and similar technologies on the Careers Site. Please see our [Cookie Notice](#) found at <https://www.willistowerswatson.com/en/cookie-notice> for more information.

**YOUR RIGHTS**

If you register on one of our Careers Sites, you may access, review, and change your personal information stored therein on each site by logging into that Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change personal information that you have already submitted for

consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your personal information if it changes or is inaccurate.

If you register on our Talent Network, you may access, review and change your personal information stored therein by logging into the network and updating your account information.

Apart from having control over the information contained in your profile, you have the right to:

access your personal information;
rectify the information we hold about you;
erase your personal information;
restrict our use of your personal information;
object to our use of your personal information;
receive your personal information in a usable electronic format and transmit it to a third party (right to data portability);
withdraw your consent to any processing based on consent at any time; and
lodge a complaint with your local data protection authority if you believe that we have not been able to assist with your complaint or concern.

Please contact us at [dataaccessrequest@willistowerswatson.com](mailto:dataaccessrequest@willistowerswatson.com) or Willis Towers Watson, 800 N Glebe Road, Arlington, VA 22203, Attn: Privacy with any such requests. In your request, please make clear what personal information you would like to access or have changed, whether you would like to have personal information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal information. For your protection, we may only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.

**SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the “*Contact Us*” section below.

**LINKS TO THIRD-PARTY WEBSITES**

The Careers Site may contain links to other websites. This Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Careers Site links. The inclusion of a link on the Careers Site does not imply endorsement of the linked site or service by Willis Towers Watson or our affiliates. We encourage you to read the legal notices posted on those sites, including any privacy policies or notices.

**APPLICABLE LAW AND DATA TRANSFER**

The Careers Site allows you to apply for jobs world-wide, as a benefit of Willis Towers Watson’s centralized global recruitment function. This Careers Site is operated from the United States. Accordingly, any personal information you submit to the Careers Site will be collected in the United States and will be subject to U.S. laws including CCPA. However, if we share your

personal information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your personal information in accordance with this Notice. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers including countries outside of your country of residence which may have data protection rules that are different from those of your country. We have established safeguards to protect Personal Information that is transferred to other countries, including appropriate contractual protections.

**ABOUT CHILDREN.** The Careers Site is not intended for individuals under the age of 16.

**CHANGES TO THIS NOTICE** We reserve the right to amend this Notice at any time in order to address future developments of Willis Towers Watson, the Careers Site or changes in industry or legal trends. We will post the revised Notice on the Careers Site or announce the change on the home page of the Careers Site. You can determine when the Notice was revised by referring to the “Last Updated” legend on the top of this Notice. Any changes will become effective upon the posting of the revised Notice on the Careers Site, unless stated otherwise.

On occasion, we may obtain your explicit consent to collect and use certain types of personal information, for example when we are required to do so by law or if candidates ask us to pass their details to a third party for recruitment purposes. If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.

**CONTACTING US ABOUT THIS NOTICE:**

If you have any questions or concerns regarding our use of personal information as described in this Applicant Notice, please contact [privacy@willistowerswatson.com](mailto:privacy@willistowerswatson.com).

Last Updated: October 2020.