

Privacy Notice

EFFECTIVE DATE: October 2025

INTRODUCTION

We believe that it is important for you to understand how we process Personal Information and encourage you to take a moment to familiarize yourself with our privacy practices outlined below.

This Privacy Notice describes how Mercer (US) LLC and its affiliates (collectively, the “**Company**”, “**us**”, “**our**”), collect, use, share, retain, transfer and otherwise process information relating to identified or identifiable individuals (Personal Information), in the context of our Talent All Access Portal+ (the “**Platform**”) and its AI chatbot (“**Aida**”). It also sets out the rights you may have regarding your Personal Information.

IDENTITY OF CONTROLLER

The Company will always act as a Controller in respect of the Personal Information processed in the context of the Platform or Aida.

Please note that where required under law, we have appointed a Data Protection Officer to oversee the processing of Personal Information. The identify of your Data Protection Officer will depend on your geographical location and the specific services offered.

If you have any questions about the Company and its role as a Controller or to find the contact information for the Company, please contact your local Data Protection Officer at privacy@mmc.com.

WHAT PERSONAL INFORMATION DO WE COLLECT

We may collect the following categories of Personal Information where appropriate to fulfil our intended business purposes:

Category	Examples
Biographical identifiers	Name, job title, date of birth, employer details and geographical location.

Category	Examples
Business contact information	Business email address or telephone number.
Login credentials	Information provided by us or generated by you to create an account to access the Platform, Aida or any other applicable website or application. This may include a unique ID generated by us and which is context to your business email address, name or other identifying Personal Information.
Internet or other similar network activity	Browsing and search history, interaction with the Platform, Aida or any other applicable website, application, or advertisement, data from cookies or web beacons (including third party tracking tools), domain names, and interactions with our emails, including when you read and respond to emails, ISP (Internet Service Provider), browser details, geolocation, and other website activity or online identifiers (including IP address or device ID).
User Generated Content	Any Personal Information uploaded to Aida or the Platform by you, or any content you generate when interacting with a Platform functionality such as a chat room or forum.
Any other voluntarily-provided information	Information regarding your colleagues or employees, disclosure statements, restrictive covenants, marketing and communication preferences, information related to company-sponsored events that you have attended, and your feedback or survey responses where you choose to identify yourself

HOW WE COLLECT PERSONAL INFORMATION

We may collect Personal Information from the following sources (depending on the service we are seeking to or are providing and country you are in):

Information Provided by You, Your Representatives or Third Parties

- Directly from you or your family members, online, face to face, by telephone, or in written correspondence, including where information is submitted on your behalf (where the person submitting has your permission to do so). For example, we may collect information when you visit a website, enroll in benefits, request a quote, call a service center, or otherwise give us information;

- Your representatives, including your employer, association, or group or benefit program/plan sponsor;
- In the event of a claim, third parties including the other party to the claim (claimant/defendant), witnesses, experts (including medical experts), loss adjusters, lawyers and claims handlers;
- Other insurance market participants, such as insurers, reinsurers, appointed loss adjusters and other intermediaries;
- Credit reference agencies (to the extent the Company is taking any credit risk or participating in any underwriting activities);
- Anti-fraud databases and other third-party databases, including sanctions lists;
- Government agencies, such as vehicle registration authorities and tax authorities;
- Claim forms;
- Resources that provide publicly-available information;
- Business information and research tools;
- Selected third parties who provide us with details of potential customers;
- Third parties who introduce business to us; and
- Vetting and data validation agencies and other professional advisory service providers in connection with our marketing or business development activities.

If you supply us with Personal Information about other people (e.g., family members, beneficiaries, or dependents), you represent that you have the authority to provide this information and that you have shared this Privacy Notice where appropriate. We do not knowingly collect Personal Information directly from minors.

If a third party (e.g., your employer) collects your personal information, we encourage you to read the third party's privacy policy to learn more about how your information will be used and disclosed by them.

If you communicate with one of our investment advisors through any device or method, please note that we log and monitor all such communications in order to comply with our record-keeping obligations.

Collection by Automated Means

We use cookies and related tracking technologies ("Cookies") on our company-owned websites. If available based on your jurisdiction, website users can opt-out of our use of certain Cookies using the Manage Cookies link at the bottom of the website and find out more about how we use Cookies by selecting the Cookie Notice.

INTERACTIONS WITH THIRD PARTIES

External Links

Our websites may include links to websites that are operated by organizations other than the Company. If you access another organization's website using a hyperlink on our website, the other organization may collect information from you. The Company is not responsible for the content or privacy practices of linked websites or their use of your Personal Information. If you leave a Company website via such a link (you can tell where you are by checking the URL in the location bar on your browser), you should refer to that website's privacy policies, terms of use, and other notices to determine how the other organization will handle any Personal Information they collect from you.

Collection by Third Parties

If you conduct a transaction through us, a third party (e.g., a service provider or insurer) may collect and process credit card or other Personal Information about you, including through Cookies, in connection with such a transaction. In those instances, and for any other arrangement where we receive information from your employer, association or other third party, we encourage you to read the third party's privacy policy to learn more about how your information will be used and disclosed by them.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

We may use Personal Information we collect:

Purpose	Description of Use	Legal Basis
To conduct our business	We use Personal Information as necessary to conduct our business, including to verify your identity, respond to your queries, communicate with you, process transactions, establish an online account, or carry out our contractual obligations.	Contract performance and, where applicable, legitimate interests (to enable us to perform our obligations and provide our services to you).
To provide you with marketing material where permissible under	We may use your contact details to send you information about products, services, and insights we think might be of interest to you. These communications may be sent by email, text, post, or phone in accordance with your marketing preferences and applicable global laws, including those relating to data protection and electronic communication. As a	Consent (which you can refuse or withdraw) and, where applicable, legitimate interest (to keep you updated with news in relation to our products and services).

Purpose	Description of Use	Legal Basis
<p>applicable law</p>	<p>result, the basis on which we contact you will vary depending on who you are, our relationship with you, and where you are located.</p> <p>Regardless of the basis on which we share our marketing communications with you, we will comply with local law and provide an option for you to unsubscribe at any time in which case we will stop sending you our marketing communications. You can also change your marketing preferences by contacting us at privacy@mmc.com.</p> <p>Please note that, even if you opt-out of receiving marketing communications, we may still send you communications in connection with the services we provide to you.</p>	
<p>For research, data analytics and development purposes</p>	<p>We may analyse Personal Information together with information from other clients to create insights, reports, and other analytics to better understand and improve the quality of our offering; market our advice, products, and services; and evaluate the effectiveness of our marketing activities, websites, and overall service. This may include analysing your Personal Information alongside other data uploaded or added to the Platform or Aida.</p> <p>Please note that we may de-identify Personal Information such that it is not associated with any particular client or individual.</p>	<p>Where applicable, legitimate interests (to allow us to improve our services).</p>
<p>To log and monitor certain activities and maintain network security and performance,</p>	<p>We log and monitor communications and transactions to ensure service quality, compliance with procedures and legal requirements, and to combat fraud. We also use Personal Information as necessary to maintain network security, monitor website</p>	<p>Legal obligation, and, where applicable, legitimate interests (to ensure the quality and legality of our services).</p>

Purpose	Description of Use	Legal Basis
and protect against cyber attacks	performance, and protect our systems against cyber-attacks.	
To maintain our websites and ensure website content is relevant	We use Personal Information as necessary to maintain our websites and ensure that content from our websites is presented in the most effective manner for you and for your device.	Contract performance and, where applicable, legitimate interests (to allow us to provide you with content and services on the websites).
To reorganise or make changes to our business	As necessary if we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation.	Legal obligation or legitimate interests (to allow us to change our business).
In connection with legal or regulatory obligations	We use Personal Information to comply with our regulatory disclosure requirements or as part of dialogue with our regulators as applicable.	Legal obligation, and where appropriate, legitimate interests (to cooperate with law enforcement and regulatory authorities).
For Fraud, Anti-Money Laundering and Sanctions Screenings	When establishing or maintaining client relationships for the provision of certain services we use Personal Information for the purposes of carrying out fraud, anti-money laundering or sanctions checks.	Legal obligations and, where appropriate, legitimate interests (to cooperate with law enforcement and regulatory authorities).

We may also use the Personal Information we collect and receive as otherwise described to you at the point of collection.

PROFILING AND AUTOMATED DECISION MAKING

The Company does not currently carry out processing of Personal Data that would result in automated-decisions that may affect you when you interact with the Platform or Aida. To the extent we engage in the automated processing of your Personal Information in the future, we will provide you in advance with any notices, including regarding your rights, that are required under law.

MARKETING

We may use your Personal Information to send you information about products, services and insights we think might be of interest to you. These communications may be sent by email, text, post, or phone in accordance with your marketing preferences and applicable global laws, including those relating to data protection and electronic communication. As a result, the basis on which we contact you will vary depending on who you are, our relationship with you, and where you are located. For example, if you have an existing or recent business relationship with us or if you have completed a form on one of our websites, including in connection with downloading a report or registering for event or webinar, we will use your preferred work contact details to provide you with information that we think might be of interest. Where necessary, we rely on consent for marketing communications. If we are relying on your consent, you will have the option to refuse or withdraw it.

Regardless of the basis on which we share our marketing communications with you, we will provide an option for you to unsubscribe at any time in which case we will stop sending you our marketing communications. You can also change your marketing preferences by contacting us using the contact details in this notice.

Please note that, even if you opt out of receiving marketing communications, we may still send you communications in connection with the services we provide to you.

Right to Opt in or out of Sale or Sharing for Cross-Context Advertising

If you visit one of our websites, we may disclose your internet or other electronic network activity information, biographical identifiers, geolocation data, and professional information (to the extent it can be derived from your activity on our website) to website analytic and advertising providers for cross-context behavioral or targeted advertising purposes utilizing advertising cookies. Under some laws, this activity may be considered a sale or sharing of information, and you may have the right to opt in or out of these types of disclosures. To opt-in or out of our selling or sharing your Personal Information on our websites or to view the names of specific third parties with whom we have sold or shared your information, please click on the “Manage Cookies” link at the bottom of our webpage.

You may also implement a browser setting or extension to communicate your selling and sharing preferences automatically to the websites you visit. Our websites process such “opt-out preference signals” in a frictionless manner by recognizing the Global Privacy Control (GPC). If you want to use

GPC, you can download and enable it via a participating browser or browser extension. More information about downloading GPC is available [here](#).

Direct Marketing and Do Not Track Signals

You may have a right to request and obtain a notice once a year about the Personal Information we disclosed to other businesses for their own direct marketing purposes, where permitted by law. If applicable, such a notice will include a list of the categories of Personal Information that were disclosed (if any) and the names and addresses of all third parties to whom the Personal Information was disclosed (if any). The notice will cover the preceding calendar year. You may contact us as provided below if you would like to learn if this right applies to you and, if so, exercise that right.

Please note that some of these rights may be limited where we have an overriding legitimate interest or legal, regulatory, or contractual obligation to continue to process the Personal Information, or where the Personal Information may be exempt from disclosure or erasure under to applicable law. Some of these rights can be exercised only in certain circumstances or may otherwise be limited by data protection legislation in your jurisdiction.

WHO WE DISCLOSE PERSONAL INFORMATION TO

We may disclose Personal Information to the following categories of third parties:

Categories of third parties	Purpose for Disclosure
Your employer, association or group of companies	Assist in the administration of a group licenses to access the Platform and Aida and as otherwise necessary to provide our contracted services.
Affiliates	Assist in providing the services and enable them to provide services to you or contact you regarding additional products and services.
Agents or third-party service providers	Perform functions or services for us or on our behalf. Such third parties are contractually restricted from using Personal Information for purposes other than providing services for us or on our behalf. This includes third parties who support us with analysing interactions with the Platform and Aida.

Categories of third parties	Purpose for Disclosure
Marketing partners, including affiliates and third parties engaged by us or our clients in connection with the services.	As permitted by law to provide you with information about our products, services, events, or insights.
Potential partners or successor entities	In the context of mergers, acquisitions, bankruptcies, asset sales or other transactions where a third party assumes control of all or part of our assets.
Website analytics and advertising companies	To improve our services, for general operations and business needs, and to help us to improve user experiences on our websites and personalize content, measure the performance and use of content on our websites, and derive insights about the audiences who visit our websites and review content.
Anti-fraud databases, supervisory or regulatory authorities, law enforcement and other third parties	As necessary to prevent fraud, communicate with supervisory or regulatory authorities, protect, enforce and defend the legal rights, safety, and security of our Company, our affiliates and business partners, and users of any website; respond to claims of suspected or actual illegal activity; respond to an audit or inquiry, or investigate a complaint or security threat; or comply with applicable law, regulation, legal process, or governmental request.

We may also disclose de-identified information that is not reasonably likely to identify you for commercially legitimate and lawful business purposes. Where we have de-identified information, we will maintain and use it without attempting to re-identify the data other than as permitted under law.

STEPS WE TAKE TO PROTECT PERSONAL INFORMATION

Our company strives to comply with all applicable cybersecurity and data protection laws. With these goals in mind, Marsh McLennan has a dedicated Chief Information Security Officer (CISO) and a Global Chief Privacy Officer (GCPO). The CISO is responsible for managing a Global Information Security team and a comprehensive cybersecurity program. As part of our cybersecurity program, we have implemented commercially reasonable physical, administrative, and technical safeguards to protect your Personal Information from unauthorized access, use, alteration, and deletion.

The GCPO leads and oversees a Privacy Center of Excellence and a Data Protection Officer Network responsible for implementing our comprehensive global privacy program. The Data Protection Officer Network connects our Data Protection Officers across the world and seeks to implement our privacy program consistently and thoroughly wherever we process data. You can find the name and contact information for the Data Protection Officer in your jurisdiction by emailing us at privacy@mmc.com.

YOUR DATA PROTECTION RIGHTS

As the Controller of your Personal Information, we are primarily responsible for deciding how your Personal Information is processed. In such case, you may have some or all the rights listed below, depending on the jurisdiction and our reason for processing your Personal Information.

Please note that we may need to use your Personal Information to verify your identity prior to fulfilling any of the below rights:

- **Right of access (Right to know)**

You may ask us to provide you with further details on how we make use of your Personal Information, the sources, the categories or specific pieces of Personal Information we have collected, the categories of third parties to whom we have disclosed the information, and to request a copy of the Personal Information that we hold about you.

- **Right to correct**

You may ask us to update any inaccuracies in the Personal Information we hold. If we disclose your Personal Information to others, we will tell them about the correction where possible.

- **Right to delete**

You may ask us to erase your Personal Information where we no longer have lawful grounds to process it.

- **Right to object to or restrict processing**

You may have a right to restrict the processing of your Personal Information in certain circumstances, such as where you contest its accuracy.

- **Right to data portability**

You may have the right, where it is technically feasible, to ask that we transfer to a third party of your choice a copy of Personal Information we have obtained from you, in a structured, commonly used, and machine-readable format.

- **Right to withdraw consent**

If we rely on your consent as our legal basis for processing your Personal Information, you have the right to withdraw that consent.

- **Right to lodge a complaint**

You may have the right to lodge a complaint with the relevant supervisory or regulatory authority in your jurisdiction if you have a concern about any aspect of our privacy practices.

If you wish to exercise any of the above rights or request review of a decision or denial, please contact us using the applicable contact information:

- If you are located in the European Economic Area, Switzerland or the United Kingdom, complete this [Form](#)
- If you are located in any other jurisdiction, complete this [Form](#)
- Alternatively, you can exercise your rights by contacting us using the information set out below.

CROSS-BORDER TRANSFERS

As a global company operating across more than 80 countries, there are circumstances in which we will have to transfer Personal Information out of the country, province, or territory in which it was collected for the purposes outlined in this Privacy Notice. Specifically, we may transfer data to offer, administer, and manage the Services provided to you, and to enhance the efficiency of our business operations. We will make every effort to ensure that these transfers adhere to all relevant data protection legislation, and that the rights and freedoms of individuals under such laws are appropriately safeguarded.

Where the need for such a transfer arises, we will take steps to ensure that there are appropriate safeguards in place to protect Personal Information such as an impact assessment, adequacy decision by the appropriate supervisory authority, the use of approved binding corporate rules or standard contractual clauses, or your consent.

For information regarding how Marsh & McLennan Companies' EU (European Union) Binding Corporate Rules (EU BCRs) operate, click [here](#). For a list of entities that have agreed to be bound by the EU BCRs, click [here](#).

For information regarding how Marsh & McLennan Companies' UK Binding Corporate Rules (UK BCRs) operate, click [here](#). For a list of entities that have agreed to be bound by the UK BCRs, click [here](#).

RETENTION OF YOUR INFORMATION

Our products, services, and regulatory obligations are complex, and thus our retention periods for Personal Information vary. We consider the following obligations when setting retention periods for Personal Information and the records we maintain:

- The need to retain information to accomplish the business purposes or contractual obligations for which it was collected;
Our duties to effectuate our clients' instructions with respect to Personal Information we process on their behalf;
- Our duties to comply with mandatory legal and regulatory record-keeping requirements;
- Our backup and disaster recovery procedures; and
- Other legal impacts such as the applicable statute of limitations periods.

Based on the factors above, we may retain Personal Information beyond the period for which we provide services to you. When we no longer need to retain Personal Information, our company policies require that we either de-identify or aggregate the information (in which case we may further retain and use the de-identified).

QUESTIONS OR CONCERNS

To submit questions or requests regarding this Privacy Notice or our privacy practices, please email us at privacy@mmc.com.

If you would prefer to contact us by post, please write to your local Mercer office and mark the correspondence as for the attention of the Data Protection Officer, courtesy of the Privacy Center of Excellence. If you prefer to contact us by phone, please call your local Mercer office and they will provide you with further details of your local Data Protection Office. You can find the contact information for your local Mercer office on our website, here: [Mercer office locations](#)

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice is subject to change at any time. If we make changes to this Privacy Notice, we will update the date on which it was last changed. Where we have an engagement with you, we will notify



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you of any material changes we make to this Privacy Notice in accordance with the notice provisions in the terms of our engagement. In other circumstances, we will publish the revised Privacy Notice on the Platform.

Download our [Privacy Notice](#) here.