

# **WILLIS TOWERS WATSON**

## **APPLICANT PRIVACY NOTICE**

**Last Updated: March 2019**

Willis Towers Watson PLC (“Willis Towers Watson,” “We,” or “the Company”) values your trust and is committed to the responsible management, use and protection of personal information. This Applicant Privacy Notice (“Notice”) describes our practices in connection with all the information that we collect through the Careers section (“Careers Site(s)”) of our websites, our onboarding process for new hires and offline in connection with your consideration or application for a job or internship with Willis Towers Watson or one of our affiliates. Personal information submitted elsewhere on Willis Towers Watson’s and its affiliates’ web sites will be used in accordance with our general online Privacy Statement located at <https://www.willistowerswatson.com/en/privacy-and-cookies>.

### **INFORMATION WE COLLECT**

#### **Information You Provide**

We may collect the following information from you in connection with your application or Talent Network account

- Name, address, telephone number, e-mail address, and other contact information;
- Username and password;
- Work authorization status;
- CV, résumé, cover letter, previous work experience and education information;
- Skills;
- Professional and other work-related licenses, permits and certifications held;
- Information relating to references;
- Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships);
- Identity documents, such as your passport; and
- Personal information required for background checks and new hire creation after offer acceptance (e.g. National Identifier, Date of Birth, Citizenship, Bank Account Information, and Tax Related Information, Work Authorization Details)

In some countries we ask for information regarding the ethnic origin, gender, and disability of our applicants for equal opportunity monitoring purposes. These types of information are

considered special categories of personal information under data protection laws (sometimes referred to as "sensitive personal information"), and are subject to additional protection.

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.

Any information you submit to us in connection with your application or through your Talent Network account must be true, complete and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process, offer rescission, or inability to receive or be eligible for future professional opportunities at Willis Towers Watson through Talent Network, or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

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.

### **Information from Other Sources**

Willis Towers Watson may obtain information about you from your references or from a background check report in connection with your application, as permitted by applicable law. This information may include:

- information about your performance, skills, attitude and personal attributes provided by your references; and
- criminal records (where relevant for certain roles), credit reports and immigration information from information available on public record or obtained through background check providers.

We may also collect information about your identity, experience and suitability for a particular role from your recruitment agency, temporary staffing agency or where applicable, your current employer.

### **USE OF INFORMATION**

The information that you submit to us will be used for Willis Towers Watson's global personnel recruitment, management and planning purposes, as permitted by local law, including:

- To process your application;
- To assess your capabilities and qualifications for a job;
- To inform you of future professional opportunities at Willis Towers Watson via Talent Network;
- To conduct reference checks;

- To respond to your inquiries and communicate with you about your application, and to send you information regarding the Careers Site and/or changes to our terms and policies;
- To comply with or monitor compliance with any applicable law or regulation;
- To conduct background checks if we offer you a position (the nature of which will depend upon the role);
- To run analytics on job descriptions and the effectiveness of job postings; and
- To create your Employee Profile with Willis Towers Watson after offer acceptance.

The information about you will be added to Willis Towers Watson's international candidate database and may be used to consider you for opportunities at Willis Towers Watson and its affiliates other than the one(s) for which you apply. If you do not wish us to do this, please contact [dataaccessrequest@willistowerswatson.com](mailto:dataaccessrequest@willistowerswatson.com). 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.

Willis Towers Watson may also use the information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; and (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

Providing personal information to us is voluntary. However, if you fail to provide sufficient information, Willis Towers Watson may be unable to consider your employment application or, if you are hired, to process important employment matters, your subsequent promotion, transfer or relocation.

## 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:

- a) to fulfil our contractual obligations to you in connection with your employment contract with us;
- b) to comply with our legal obligations, for example obtaining proof of your right to work status to enable us to meet relevant obligations;
- c) to comply with our legal obligations to you, for example health and safety obligations that we must comply with as your employer or to a third party (e.g. the taxation authorities); and
- d) 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.

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.

## **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](https://www.willistowerswatson.com/en/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. 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.

## CONTACT US

If you have questions or requests, please feel free to contact us at [privacy@willistowerswatson.com](mailto:privacy@willistowerswatson.com) or Willis Towers Watson, 800 N. Glebe Rd, Arlington, VA 22203, Attn: Privacy.