

Aon New Zealand

Global Privacy Statement

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1. Introduction

This Global Privacy Statement (“**Statement**”) explains how Aon plc (NYSE: AON) and its affiliated companies and subsidiaries (“**Aon**”) collect, use and disclose your personal information, including the categories of personal information we process and the purposes for which we use it. Throughout this Statement, Aon may be referred to as “we”, “us”, “our” or “Aon”. A full list of the Aon group entities is available [here](#).

This Statement applies to any personal information you provide to Aon and any personal information we collect when you contact us, visit or use our websites or applications, visit an Aon location, attend Aon events or seminars, request a service from us or use other services that refer to or link to this Statement (each, a “**Service**”). The personal information we collect varies depending upon the nature of the Services we provide and how you interact with us. This Statement may be supplemented by additional privacy statements, terms or notices relevant to the applicable Services.

The Aon group company who is responsible for, or administers, the Service is also responsible for processing the personal information provided to us or collected by or for the Service.

This Statement does not apply to your use of any third-party sites linked to from our websites or Services.

2. Collecting your personal information

2.1. Types of information we collect

The personal information we collect varies depending upon the nature of our Services.

The information we collect about you may include the following:

a.	Contact details: such as your name, email, postal address, social media handle, and phone number
b.	Unique identifiers: such as Passport Number, National ID, IRD number, Drivers Licence details, National Insurance Number or pension scheme reference number
c.	Demographic details: such as your date of birth, age, gender, race, photo, marital status, lifestyle, and insurance requirements

d.	Employment information: such as job title, employee number, employment status, salary, employment benefits, and employment history, qualifications and affiliations
e.	Health information: such as medical records, health status and medical assessment outcomes
f.	Benefits information: such as benefit elections, pension entitlement information, date of retirement and any relevant matters impacting your benefits e.g. voluntary contributions, pension sharing orders, tax protections or other adjustments
g.	Financial information: such as credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details, invoicing and payment information.
h.	Policy and claims details: such as your policy number, risk profile, professional membership details, details of your income, assets, and any information about any claims concerning your or your employer's insurance policy, claims history
i.	Marketing and communications preferences: such as interests and preferred language
j.	Online information: such as computer, device and connection information (e.g. IP address, browser type, operating system, unique device identifier), usage data collected when visiting our websites, device location information
k.	Events information: such as information about your interest in and attendance at our events, including provision of feedback forms
l.	Background checking information: such as Anti Money Laundering identity checking, inclusion on a sanctions list or a public list of disqualified directors, the existence of previous or alleged criminal offences, or confirmation of clean criminal records, information in relation to politically exposed persons
m.	Comments, feedback or other information provided to us: such as social media interactions with our social media presence, comments provided on feedback forms or surveys and questions or information sent to our support services
n.	Account login credentials: such as username and password, password hints and security information related to a Service we provide
o.	Payment information: such as credit or debit card number and bank account details
p.	Driving history, certifications and insurance details: such as driving licence details, the period for which a licence has been held, existing and previous insurance policy details, previous accident and claims history and details of any motoring convictions
q.	Asset information: details of assets insured such as vehicle, house and contents details for the purpose of arranging insurance.

2.2. Sources of information

We collect personal information about you in the following ways:

a.	Information you provide directly to us: we collect personal information about you when you request a Service from us; visit an Aon site or attend an Aon event or seminar; apply for a position at Aon; through your use of our Services; provide comments, feedback or communicate directly with us
b.	Information from your organisation: we may obtain personal information about you from the organisation with which you are employed or affiliated, in order to provide Services to them and/or manage your access to and use of the organisation's Service
c.	Information we collect automatically: we may collect certain types of information about you automatically when you use our Services, visit our websites or communicate with us online or through the e-mails that we may exchange. We may collect this information through the use of "cookies" or similar

	technologies such as web beacons, gif or pixel tags or other unique identifiers to measure online activity, provide more relevant advertising or analyse the effectiveness of communications or our promotional campaigns. Further information about our use of cookies can be found in our Cookie Notice and relevant Cookie Preference Centre at the footer of our page (where applicable)
d.	Information from third parties: we may collect personal information about you from other third parties, such as insurers, underwriters, reinsurers, referrers, other insurance brokers, credit reference agencies, government agencies such as ACC, medical professionals, government bodies such as police and regulators, claimants, referees, premium funders, your employer (where the insurance is through or related to your employer), your relatives (where they may be taking out insurance that also covers you), your legal advisor or advocate, your agents, publicly available sources such as social media platforms, property and asset registers and claims and conviction records, credit agencies, vetting and data validation agencies and other professional advisory service providers. This information may be sourced prior to and during the course of providing the Services.

2.3. Impact of failing to provide information

You agree to provide any personal information we reasonably require (in a form acceptable to us) to meet our obligations in connection with the Services we provide to you, including any legal and regulatory obligations, **noting that we may need to disclose your personal information to agencies outside of New Zealand for the purposes of providing the Services, and that such agencies may not be subject to comparable data protection laws to those in New Zealand.** You also authorise us to contact third parties for the purposes of providing information to us so we can provide the services to you. You may refuse consent or subsequently withdraw your consent at any time once provided. Where you do not provide consent, withdraw your consent or fail to provide or delay in providing information, we reasonably require to fulfil our obligations, we may be unable to offer the Services to you and/or we may terminate the Services provided with immediate effect.

2.4. Information you provide relating to third parties

Where you provide personal information to Aon about third-party individuals (e.g. information about your spouse, civil partner, child(ren), dependents, employees or emergency contacts), where appropriate, you should provide these individuals with a copy of this Statement beforehand or ensure they are otherwise made aware of how their information will be used by Aon and that they agree to their personal information being provided to Aon and processed in accordance with this Statement, **having advised them that in order for Aon to provide the Services, their personal information may be disclosed to an agency outside of New Zealand that does not have comparable data protection laws to those under New Zealand law.**

2.5. Information relating to children

Our Services are not directed to children, and we do not knowingly collect personal information from children. Certain Aon solution lines may process data related to children, such as their date of birth, address, and other identifiable information. This information is not collected directly from children, but from other parties such as from our client, the carrier, or directly from you as the parent or guardian of the child (e.g., so that the child may be named a beneficiary to an insurance policy or pension plan).

3. Purpose of collection of your personal information

We collect, store, use and disclose your personal information so that we may provide insurance broking, claims management and risk management services to you and to provide services ancillary to those services or for third parties to assist us with providing these services to you, alongside other related purposes which may include to:

a.	offer, administer and manage the Services provided to you, including providing initial and renewal quotations and client care information, assessing and managing insurance applications and policies, claims services (including dealing with medical and other agencies where applicable), appointing loss adjustors, placement of insurance, placing reinsurance and dealing with claims with reinsurers, and referring you to or obtaining quotes from premium funding service providers;
b.	carry out due diligence, identity, credit reference, bankruptcy, sanctions, data validation, anti-money laundering, "Know Your Customer" and other business acceptance, vetting and risk management agency checks;
c.	evaluate risks relating to your or your organisation's prospective or existing insurance policy;
d.	Manage and process payments, including your payments for the insurance premium and any mid-term adjustments, credit control purposes;
e.	administer, investigate and settle claims or complaints in relation to insurance policies and/or the Services provided;
f.	facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;
g.	enforce our agreements, trace debtors and recover any outstanding debt in connection with the Services provided;
h.	fulfil legal and regulatory obligations including statutory or regulatory reporting, resolve disputes and monitor compliance with the same;
i.	transfer books of business to successors of the business in the event of a sale or reorganisation, including the planning and due diligence purposes both prior to closing and after a transaction has closed
j.	perform analytics for risk modelling purposes and to analyse trends;
k.	conduct market and customer research and canvass your views about the Services and to develop and improve our products and Service offerings generally;
l.	Communicate about and offer other products and Services that may be of interest to our clients, prospective clients and individual representatives of our corporate clients, including sending newsletters, know-how, promotional material and other communications;
m.	communicate with you and to respond to your requests, inquiries, comments and concerns;
n.	research, internal and external audit, internal training, reporting and other business operations purposes, including determining the effectiveness of our promotional campaigns and evaluating business performance;
o.	perform benchmarking, modelling, market research and data analysis associated with the development of new and existing processes, products and Services;
p.	invite you to events or seminars, including arranging and administering those events;
q.	provide third party administration services to ACC accredited employers and to claimants in relation to ACC claims;
r.	provide professional services across our global solution lines;

s.	operate our business and manage and develop relationships with clients, supplier and with you;
t.	understand how you and our clients use our services and websites; and
u.	any other purpose we notify to you at the time personal information is collected.
<p>If applicable law allows, we may collect and use your information for a substantial public interest. For example, to prevent or detect unlawful acts or in public health.</p>	
<p>Where you choose to receive the Services from us you agree to the collection and use of your personal information in the way we describe in this section of the Statement. You also agree that such information may be collected and used for the above purpose by the insurance underwriter named in your insurance policy documentation. You should refer to the insurer's privacy notice on their website for further information about their privacy practices.</p>	

4. Accuracy of your personal information

We rely on the availability of accurate personal information in order to provide the Services to you and operate our business. You should therefore notify us of any changes to your personal information, particularly changes concerning your contact details, bank account details, insurance policy details or any other information that may affect the proper management and administration of your insurance policy and/or the services provided to you.

5. Recipients of your personal information

We generally share your personal information with the following categories of recipients where necessary to offer, administer and manage the services provided to you:

a.	within Aon: we may share your personal information with other Aon entities, brands, divisions, and subsidiaries for the processing purposes outlined in this Statement;
b.	insurance market participants: where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers, other intermediaries, premium funders, insurance reference bureaus and industry bodies and loss adjusters. The insurance underwriter is the insurer that is underwriting your insurance Statement and is named in your policy documentation. You should refer to the insurer's privacy notice on their website for further information about their privacy practices;
c.	vetting and risk management agencies: such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the services;
d.	Professional advisors: such as underwriters, actuaries, surveyors, auditors, financial institutions, legal advisers, loss adjusters, and claims investigators where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature;
e.	medical professionals and vocational service providers: e.g. where you provide health information in connection with a claim against your insurance policy or a claim under ACC;
f.	law enforcement bodies: where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders;

g.	public authorities, regulators and government bodies: where necessary for us to comply with our legal and regulatory obligations;
h.	third party suppliers: service providers engaged in relation to your insurance such as loss adjustors, repairers and third parties who help manage our business and provide our services, including our third party service providers, such as payment system operators, IT suppliers, lawyers, accountants, other advisers and financial institutions. Where we outsource our processing operations to suppliers that process personal information on our behalf, these processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions;
i.	successors of the business: where Aon or the services are sold to, acquired by or merged with another organisation, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Statement; and
j.	Internal and external auditors: where necessary for the conduct of company audits or to investigate a complaint or security threat.
k.	Your employer: as part of our provision of services to you or your employer.
l.	Other insured parties: others named on a policy as co-insureds, joint insureds or interested parties (whether financially interested or equitably).
m.	Asset purchasers: such as those who may purchase or to whom we may transfer our assets or business.
n.	Other third parties: that we notify you at the time of collection.

6. Overseas transfers of your personal information

6.1. We operate on a global and worldwide basis, and we therefore need to transfer personal information about you to other countries to be processed for the purposes outlined in the Statement. In particular, we may make such transfers to offer, administer and manage the services provided to you and improve the efficiency of our business operations. We also store back up information in cloud storage and in servers located outside New Zealand. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.

6.2. From time to time, we may disclose your personal information to our staff, insurers, reinsurers, premium funders, your employers' head office and third party service providers located overseas, to store and process personal information either on our behalf or otherwise, for one or more of the purposes set out in Section 3 above. **Some of these third parties may not be subject to data protection laws that are comparable to those in New Zealand.** We use reasonable endeavours to agree suitable data protections with our third party suppliers but in some cases we are not in a position to negotiate terms either due to the type of service provider or due to it being an emergency situation such as you suffering a medical event whilst travelling outside New Zealand.

6.3. Where we collect personal information about you in the UK or the European Economic Area (the "EEA") we may transfer the information to countries outside the UK or EEA for the processing purposes outlined in this Statement. This may include transfers to countries that the European Commission (the "EC") and UK data protection regulator consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Where we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as standard contractual clauses approved by the EC or UK data protection regulator, as appropriate. Where necessary, we may implement additional technical, organizational or contractual measures to ensure an adequate level of protection for your personal information. Where required, further information concerning these safeguards can be obtained by contacting us.

7. Retention of your personal information

The personal information that you or your agents provide will be held by Aon New Zealand in accordance with the Privacy Act 2020, at Level 21, the Aon Centre, 29 Customs St West, Auckland or one of our other branches, within New Zealand and/or in offshore facilities of companies which are part of the global group of companies held by Aon plc (NYSE: AON).

We retain appropriate records of your personal information to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you. In most cases we shall retain your personal information for no longer than is required under the applicable laws.

8. Information Security

The security of your personal information is important to us, and we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws.

9. Your Information Rights

9.1. You have the following rights under applicable data privacy laws in respect of any personal information we collect and use about you:

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| a. | Right to access: a right to access and inspect your personal information. |
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b.	Right to correction: a right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information and to give notice that you dispute its accuracy.
c.	Right to object to processing: a right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
d.	Right to object to direct marketing: a right to object to the use of your personal information for direct marketing purposes. See Section 10 below for further information.
e.	Right to restrict processing: a right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed, and you request that the information not be used until its accuracy is confirmed.
f.	Right to lodge a complaint with a regulator: a right to complain to the relevant data protection regulator about our processing of your personal information. See Section 11 below for further information.

9.2. It is important to note, however, that some of the rights described above in Section 9.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy laws, we will write to you to explain the reason for refusal. Where required, further information concerning these rights and their application can be obtained by contacting us.

10. Direct Marketing

We will use your personal information to send you direct marketing about other products and services that we feel may be of interest to you. We will give you the opportunity to refuse direct marketing at the point that you apply or register to receive the services and, on each occasion, thereafter that you receive direct marketing communications from us. You can also change your marketing preferences at any stage by contacting us. Please note that, even if you opt out of receiving direct marketing communications, we may still send you service-related communications where necessary.

11. Privacy Complaints

11.1. If you wish to make a privacy complaint about the way we use your personal information you should raise this with us by contacting us using the details set out in Section 12 below.

11.2. However, if you are not satisfied with the way we have handled your privacy complaint or you would prefer to make a complaint directly to the regulator you have the right to raise the matter with the relevant data protection regulator in your country. In New Zealand this is the Office of the Privacy Commissioner.

12. Contact us

If you have any questions about the content of this Statement or the rights conferred to you under the applicable data privacy laws, you should contact Aon's Global Privacy Office at privacy@aon.com

13. Changes to this Statement

Aon reserves the right to reasonably amend this Statement from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you and to comply with applicable laws. Any updates or changes to this Statement will be made available on our website. You should periodically review this Statement to ensure you understand how we collect and use your personal information.

This Statement was last updated on 27 June **2025**.