

MERCER

Annual Notice of Mercer's Privacy Practices and Policies As Required by the Gramm-Leach-Bliley Act

Background

Title V of the Gramm-Leach-Bliley Act, which was enacted in 2000, and related state laws and regulations establish limitations on the use and distribution of information collected by financial institutions from their customers and consumers. Our insurance-related work qualifies Mercer as a financial institution under this Act. This letter is sent as part of Mercer's compliance with the Gramm-Leach-Bliley Act, to notify clients of our privacy practices and policies.

Information we collect

In the course of providing certain insurance-related services to our health care and group benefits clients, Mercer may collect non-public personal information concerning our clients' employees and their family members. This information derives from several sources:

- Data we receive from our clients such as employee records.
- Data we receive from clients' employees such as election forms.
- Data we receive from third parties, such as insurance companies, health care providers and third party administrators.
- Data we generate by processing and verifying information received from other sources.

While we do not need or use this individual data for much of our insurance-related consulting work, Mercer may have access to it in the course of client assignments.

Disclosure of information

It is Mercer's policy not to disclose to third parties any non-public personal information, except as required to process, complete or administer the service or coverage for which the data was obtained, or as otherwise authorized by the client, a plan participant or applicable law. Within Mercer, access to such information is restricted to those employees who have a need to know. Any contractual requirements established by our clients which are more restrictive than our policy are overriding.

Our practices regarding information confidentiality and security

We have established physical, electronic and procedural safeguards to protect the non-public personal information against inappropriate use or disclosure..

Your right to access, correct, amend or delete certain information

You may submit a written request to us to find out what non-public information we maintain about you and the names of any financial institutions we have disclosed the information in the two (2) years prior to your request. You can also request that we correct, amend or delete any information that is not accurate or current. We do not have to agree to your request, and may ask you for additional information to support your request. We may also charge a reasonable fee to cover our costs for responding to your request.

Conclusion

Please contact your lead Mercer consultant if you have questions about this notification or send an email to PrivacyNotice@mercer.com.