

Aon Privacy Statement

This Privacy Statement describes how Aon collects, uses, and protects personal information it receives in the course of providing its services. At Aon, your privacy is very important. We strive to protect the personal information under our control and to maintain the security and integrity of that information.

How Aon Receives Personal Information

Generally, "personal information" is information that can be used to identify you. Most of the personal information we receive relates to your participation in the compensation and benefits programs offered by your employer. There are several ways that we could receive personal information:

- You might provide the information directly as a benefit plan participant by methods such as visiting our Web sites, telephoning our call center, or sending mail to our offices.
- Your employer might provide the information to us.
- Another service provider engaged by your employer (such as payroll processors, health plans, or mutual funds) that have a part in administering your employer's plans or programs might provide the information to us.

The types of personal information we receive may include:

- **Contact information**, such as name, address, phone number, email address;
- **Other personal information**, such as a Social Security number or other government-assigned identifier, date of birth, gender, and marital status;
- **Employment information**, such as date of hire, employment status, pay history, tax withholding information, performance records, and date of termination; and
- **Benefit program participation and coverage information**, such as benefit elections, beneficiary information, claims information, benefit plan account numbers and balances, and date of retirement.

Aon's Commitment to Protecting Personal Information

We understand the responsibility that comes with being trusted with your personal information. We have implemented various security measures to protect the confidentiality of all the personal information we process, in both electronic and paper formats. We have policies, procedures, and controls to reduce the risk of unauthorized or accidental use, disclosure, or destruction of your personal information, and we train our employees on data security. Employees who have a job-related need to access your personal information are authorized to do so. In addition to these employees, Aon limits access to your personal information to your employer and authorized service providers. We also require that our service providers enter into confidentiality agreements intended to protect your personal information

Our commitment to protecting personally identifiable information also means that:

- We won't sell your personal information to any third party; and
- We won't use, transfer, or disclose your personal information to anyone outside of Aon, unless authorized by you or your employer, except in connection with your employer's plans and programs, as required by law or legal process, in response to law

enforcement requests, and as necessary to protect the property, interests, and rights of Aon and/or your employer.

- If we process your "protected health information" as a business associate to your employer's health plan, we will also comply with the requirements of the HIPAA Privacy and Security Rules.

Access and Corrections

Aon is committed to respecting your rights to access your personal information. In many cases, you can access and update your personal information via our self-service Web sites or by telephoning our call center. Aon is also committed to maintaining the accuracy of your personal information. In most cases, we rely on you and your employer to keep your personal information updated. If you need to update or correct your personal information, contact dataprivacy@hewitt.com. Please understand that, in some circumstances, only your employer, and not Aon, may have the authority to update or correct your personal information. If this information is the type that only your employer can update or correct, we'll forward your request to your employer.

Cookies

Aon tracks content usage and traffic on its Web sites by using "cookies" a feature of your browser. A cookie is a text file that is placed on your hard disk by a Web server. Aon uses cookies to help it compile aggregate statistics about usage of its Web sites, such as how many users visit the Web site, how long users spend viewing the Web site, what pages are viewed most often, and to secure your session. This information is used to improve our Web sites, for transaction auditing, and for other everyday business purposes; it is not shared with any other party for any commercial purposes. You can set your browser to notify you when you are sent a cookie. This gives you the chance to decide whether or not to accept it. If you disable cookies, however, you may not be able to take advantage of all the features of our Web sites.

Notification of Updates

Aon may update this Privacy Statement. If the changes are not material or do not affect previously-provided information, we will simply post the revised Privacy Statement on our Web sites. If the changes are material in the way we treat your personal information, we will provide notice on this Web site before we make such a change. We encourage you to periodically review our Privacy Statement so that you'll always know how we protect your personal information.

Contact Information

If you have any questions or concerns about Aon's use of your personal information or about this Privacy Statement, please send an email to : dataprivacy@hewitt.com.