

## Privacy Notice

### 1. Introduction

This Privacy Notice (“**Notice**”) explains how Aon<sup>1</sup> (the “**Company**”) makes use of the personal information collected about you in connection with your application for employment.

Throughout this Notice, the Company may be referred to as “the Company”, “we”, “us”, or “our”. “Aon” refers to Aon plc, including its affiliated companies and subsidiaries (also referred to as “we,” “us,” or “our”). Personal information is collected by each member of the Aon group who is responsible for its processing in their capacity as a controller. A full list of our group entities is available [here](#). These entities may provide separate privacy notices when your personal information is first collected by that Aon entity, for example, when you or the business you work for engages us to provide a service.

Aon entities also provide services to our clients as a **processor**. Where this is the case we will process your personal information in line with our legal obligations and contractual commitments with our clients.

### 2. Collecting Your Information

#### 2.1 The information we collect about you may include the following<sup>2</sup>:

- a. contact details, such as your name, address, telephone number and email address and other contact information for your nominated referees;
- b. basic personal details, such as your date of birth, age, gender, place of birth, nationality, country of residence, immigration status, work permit status, race, religion, national insurance number, social security number, marital status, spoken languages, criminal convictions, alleged offences or prosecutions pending and any adverse Workplace Relations Commission/Labour Court findings
- c. identity verification details, such as your birth certificate, passport, pay related social insurance number, driving licence, utility bill, bank statement, identity card or other similar identification information;
- d. financial details, such as your salary, bonus, share schemes, credit status, bankruptcy status, pension scheme or other benefit details;
- e. employment, education and training details, such as your previous employment history, employment references and other similar references, educational and professional qualifications, professional licences and certifications, competency assessment and examination outcomes and training and development details;
- f. health details, such as sickness and fitness details and medical assessments reports; and
- g. equality and diversity monitoring details, such as racial and ethnic origin, gender, sexual orientation, age, marital or civil partnership status, religion or other similar beliefs and health details, including details of any physical or mental incapacity.

#### 2.2 You are required to provide any personal information that we reasonably require to assess your application for employment and meet our legal and regulatory obligations. Where you refuse to provide information that we reasonably require in order to fulfil these obligations we may be unable to consider your application.

#### 2.3 Where you provide personal information to the Company about third party individuals (e.g. information about your referees), where appropriate, you should provide these individuals with a copy of this Notice beforehand or ensure they are otherwise made aware of how their information will be used by the Company.

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<sup>1</sup> This means the Aon legal entity that has advertised the job role and any other Aon affiliates or subsidiary companies.

<sup>2</sup> The descriptions of the information comprised in each category are examples and are not exhaustive.

- 2.4 In addition to sourcing personal information from you directly, we may also collect personal information about you from other third parties, such as your nominated referees, previous employers, educational and professional establishments, credit reference agencies, vetting agencies, criminal record agencies, medical professionals and other professional advisory service providers.

### 3. Processing Your Information

We will use the information we collect about you in your application to:

- a. process applications for employment and inform recruitment decisions taken about appointments and new hires;
- b. monitor racial or ethnic origin, gender diversity and physical or mental incapacity;
- c. fulfil our legal and regulatory obligations;
- d. monitor compliance with our legal and regulatory obligations and internal policies, standards, and procedures;
- e. manage the physical and logical security of our office premises, IT systems, confidential information and intellectual property;
- f. facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;
- g. investigate, exercise or defend legal claims or other claims of a similar nature; and
- h. exercise or enforce our rights.

### 4. Legal Grounds for Processing

The Company relies on the following legal grounds to collect and use your information:

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|---|---|--|
| a. Prospective performance of the employment contract | : | We will collect and use your personal information where necessary to assess your application for employment and to determine whether we wish to offer you employment.  |
| b. Discharging legal and regulatory obligations       | : | The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations in connection with your prospective employment. For example, this may include obligations concerning equality and diversity monitoring, pay related social insurance and tax remittance, health and safety and immigration and work permit checks.  |
| c. Processing for occupational health purposes.       | : | The collection and use of some of your sensitive personal information, such as information about your physical and mental health is necessary for occupational health purposes. For example, this may include medical assessments and diagnosis to evaluate your potential work capacity and the provision of health or social care treatment.   |
| d. Processing to exercise and defend legal claims.    | : | The collection and use of some of your personal information, is necessary to enable us to establish, exercise or defend legal claims or other claims of a similar nature.  |
| e. Pursuing legitimate interests                      | : | The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, e.g. to operate our business, particularly the processing activities set out in sections 3(a), 3(d), 3(f), 3(g), 3(h) of this Notice. Where we rely on this legal basis to collect and use your personal information we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under applicable data privacy law. |

## 5. Recipients of Your Information

We generally share personal information about our prospective employees with the following recipients:

- a. recruitment agencies, where necessary to administer and manage the recruitment process;
- b. employees, where necessary to operate our business;
- c. third party suppliers, 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;
- d. successors of the business, where the Company is sold to, acquired by or merged with another organisation, in whole or in part.
- e. medical professionals and occupational health advisers, where we require you to undergo a medical assessment or require professional advice about your physical or mental health. These advisers may in turn also share personal information with us about medical assessment outcomes and your health status;
- f. public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations;
- g. legal advisers, insurers and claims investigators, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature; and
- h. law enforcement bodies, where necessary to facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders.

## 6. Overseas Transfers of Your Information

6.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries to be processed for the purposes outlined in this Notice. In particular, we may make such transfers to assess and manage your application for employment, operate our business, improve the efficiency of our business operations and comply with our legal and regulatory obligations. 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 Where we collect personal information about you in Ireland or the European Economic Area (the “EEA”) we may transfer the information to countries outside Ireland or EEA for the processing purposes outlined in this Notice. This may include transfers to countries that the European Commission (the “EC”) and the Irish 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 data transfer agreements approved by the EC or Irish data protection regulator, as appropriate. Where required, further information concerning these safeguards can be obtained from Human Resources.

## 7. Retention of Your Information

7.1 The Company retains appropriate records of your personal information to operate its business and comply with its legal and regulatory obligations. Where your application for employment is unsuccessful we will retain appropriate records of your application for a period of 15 months unless legal or regulatory obligations imposed on us require specific information to be retained for longer or where the information is being retained for the purposes described below in section 7.2. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

- 7.2 In addition to the general retention period set out above in section 7.1, we may also retain your personal information for a reasonable period to enable us to match your details with other suitable job opportunities that may arise within Aon from time to time. If you do not wish your information to be retained for this purpose you should inform Human Resources.

## **8. Accuracy of Your Information**

We rely on the availability of accurate personal information to assess your application for employment and to match you with future job opportunities that may arise. You should therefore ensure the information you submit to support your application is accurate and, where appropriate, kept up to date. You should promptly notify us of any changes to your personal information.

## **9. Information Security**

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 law.

## **10. Your Information Rights**

- 10.1 You have the following rights under applicable data privacy law in respect of any personal information we collect and use about you:

- a. The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you.
- b. The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
- c. The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
- d. The 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.
- e. The right to request the restriction of your personal information from further processing, 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. The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
- g. The right to complain to the relevant data protection regulator about our processing of your personal information.

- 10.2 It is important to note, however, that some of the rights described above in section 10.1 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 law we will write to you to explain the reason for refusal. Where required, further information concerning these rights and their application can be obtained from the Global Data Privacy Office.

## **11. Complaints**

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting Human Resources in the first instance. However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the data protection regulator:

Data Protection Commissioner  
Office of the Data Protection Commissioner  
21 Fitzwilliam Square South,  
Dublin 2,

D02 RD28,

Ireland

or online at <https://www.dataprotection.ie/en/contact/how-contact-us>

## **12. Changes to this Notice**

This Notice is not contractual and we reserve the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use your personal information. Any updates or changes to this Notice will be published on the career website, this privacy notice was updated in **March 2022**. You should periodically review this Notice to ensure you understand how we collect and use your personal information.

## **13. Contact Information**

If you have any questions about the content of this Notice or the rights conferred to you under applicable data privacy law you should contact the Global Data Privacy Office at the following address:

Data Protection Officer,  
Metropolitan Building  
James Joyce Street  
Dublin 1  
Ireland  
Email: [privacy@aon.ie](mailto:privacy@aon.ie)

## **14. Employee Privacy Notice**

Where you are offered employment with the Company a separate employee privacy notice will be issued to you to explain how we make use of the personal information collected about you in connection with your employment.