

Thinking Ahead Institute

Thinking Ahead Institute privacy policy

The Thinking Ahead Institute (the "**Institute**") is a global not-for-profit group whose aim is to influence change in the investment world for the better by improving the provision of savings. On behalf of the Institute, Towers Watson Limited and other members of the Willis Towers Watson group ("**Willis Towers Watson**", "**we**" or "**us**") collect information relating to the authorised representatives of Institute members (each and together known as "**Members**") for the purposes of enrolling Members with the Institute and providing them with access to the Institute's programmes and services.

This privacy notice describes how we handle Personal Information collected through <https://www.thinkingaheadinstitute.org/en> (the "**Site**") and through the subscription documents used to enrol Members with the Institute (the "**Subscription Documents**"). The Personal Information collected through the Site and through the Subscription Documents may relate to authorised representatives or other key contacts of Members that use the Site or have been authorised as a representative to subscribe to the Institute ("**you**" or "**your**").

1. SCOPE OF THIS PRIVACY NOTICE

This privacy notice applies to the Site and to the Subscription Documents. A separate privacy notice applies to willistowerswatson.com and other websites of the Willis Towers Watson group.

Willis Towers Watson operates worldwide through subsidiary and affiliate companies. The Institute is operated by Towers Watson Limited and other Willis Towers Watson entities may be involved in the processing of personal data related to Members (for example, to provide support and maintenance services in relation to the Site) from time to time.

Where links from the Site are provided to non-Willis Towers Watson websites, Willis Towers Watson is not responsible for those websites. The inclusion of a link to a third-party website does not imply endorsement of the linked site or service by us. These third-party websites will be governed by different terms of use (including privacy notices) and you are solely responsible for viewing and using each such website in accordance with the applicable terms of use. We are not responsible for how your Personal Information is handled by such third-party websites.

2. PERSONAL INFORMATION WE COLLECT FROM MEMBERS AND OTHER SOURCES

"**Personal Information**" is information that identifies you as an individual or relates to an identifiable individual.

In order to register as a Member, to use the Site and to participate in the Institute's activities, we will collect the name and email address of Members' authorised representatives, and we may also ask for further details such as job role, address, email address and phone number. We will then generate a username and password for each authorised representative in order to facilitate access to the Site.

The Personal Information we collect from Members through the Site or Subscription Documents relates to the authorised representative(s) of the Member. Such Personal Information may include:

- Names
- Role
- Country of location
- Email address
- Postal address
- Phone number

We ask that Members do not provide any special categories of personal data (being Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) through the Site or Subscription Documents, nor any information relating to any named individuals' criminal records.

We also collect certain information – which may include Personal Information – through the use of cookies on the Site. For more details, please read our [Cookie Notice](#) (the “**Cookie Notice**”). Note that this privacy notice supersedes the Willis Towers Watson Global Website Privacy Notice referred to in the Cookie Notice.

3. LEGAL BASES FOR PROCESSING PERSONAL INFORMATION

We must have a legal basis to process Personal Information. In most cases the legal basis will be one of the following:

- for our legitimate interests, for example to assist us in providing services to our clients by enabling us to carry out research assessments and provide advice and analysis in connection with their current and potential future investments. When we process personal information to meet our legitimate interests, we balance these interests against the interests and fundamental freedoms of individuals and put in place robust safeguards to ensure that the privacy of individuals is adequately protected;
- to fulfil our contractual obligations to you, for example to provide access to the Institute's programmes and services, to ensure invoices are paid correctly and to ensure you are able to access the Site and to participate in the Institute's activities. Failure to provide this information may prevent or delay the fulfilment of these contractual obligations; or
- to comply with our legal obligations such as due diligence and reporting obligations.

4. HOW WE MAY USE PERSONAL INFORMATION

We use Personal Information for the following purposes:

- to register Members and facilitate access to the programmes and services offered by the Institute and to the Site;
- to comply with legal and regulatory requirements, where applicable, and to cooperate with our regulators;
- to contact Members where appropriate to obtain further information;
- for risk assessment and fraud prevention and detection purposes; and
- for direct communication purposes, subject to the requirements of applicable laws (for example, we may send research updates or event invitations to you).

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your Personal Information to any Willis Towers Watson group company in connection with the operation of the Institute and the Site for the uses and purposes set out above, but your Personal Information will not be used by other Willis Towers Watson group companies for marketing or other purposes. The other Willis Towers Watson group companies will process your Personal Information in accordance with this privacy notice.

We may also disclose your Personal Information to third parties under the following circumstances:

- we permit access to some Personal Information to service providers such as entities providing customer service, email delivery, auditing, hosting our website and other services;
- we may make disclosures to any court, regulator, law enforcement agency, government body or professional body if we are obliged to do so under applicable law or regulation, which may include applicable laws or regulations outside your country of residence;
- we may disclose Personal 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).

6. CROSS-BORDER TRANSFER

The Site is hosted in the United States of America. Because of the global nature of our business your Personal Information may be processed in other jurisdictions where we have facilities or in which we engage service providers, and by using the Site you acknowledge that we may transfer information to countries outside the United Kingdom and the European Economic Area (EEA) which may have data protection rules that offer a lower standard of protection than those jurisdictions. We have established safeguards to protect Personal Information that is transferred to such other countries, including appropriate contractual protections. For more information on the appropriate safeguards in place, please contact us using the contact details below.

7. SECURITY

Willis Towers Watson maintains appropriate technical and organizational security measures to protect the security of your data against loss, misuse, unauthorized access, disclosure or alteration. These measures are aimed at ensuring the ongoing integrity and confidentiality of Personal Information. We evaluate these measures on a regular basis to ensure the security of the processing. Despite this, the security of the transmission of information via the Internet cannot always be guaranteed and you acknowledge this in your access and use of the Site. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your username or password has been compromised), please immediately notify us in accordance with the "Contact & Comments" section below.

8. RETENTION PERIOD

We will keep Personal Information for as long as the relevant Member is a member of the Institute. After that point, we will retain Personal Information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under applicable law or regulation
- Comply with any legal or other regulatory obligations
- Defend or bring any existing or potential legal claims
- Deal with any complaints regarding our activities
- Send marketing such as research updates and event invitations to individuals (unless and until we are requested to cease such marketing).

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.

9. CHOICES AND ACCESS

If you receive direct marketing from us (such as research updates and event invitations), you have the right to ask us to stop sending you direct marketing. To exercise this right, please contact us using the details provided in the "Contact & Comments" section below.

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- Access your personal information
- Rectify the personal information we hold about you
- Erase your personal information
- Object to our use of your personal information
- Receive your personal information in a useable electronic format and transmit it to a third party (right to data portability).

If you would like to discuss or exercise such rights, you may contact us by sending us an email at dataaccessrequest@willistowerswatson.com or sending your request by postal mail to the address provided in the “Contact & Comments” section below.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information removed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information.

You have the right to make a complaint to the Information Commissioner's Office (at www.ico.org.uk/concerns/) or your local supervisory authority.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

11. CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend this privacy notice or the Cookie Notice. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will take reasonable steps to ensure you are notified of these changes so that you have the opportunity to exercise your rights (e.g. to object to the processing).

You may request a copy of this privacy notice from us using the contact details set out below.

12. CONTACT & COMMENTS

If you have any questions or comments regarding this privacy notice, please contact Paul Deane-Williams at the Thinking Ahead Institute (paul.deane-williams@willistowerswatson.com) and / or the Willis Towers Watson Global Privacy Office, at 51 Lime Street, London, EC3M 7DQ or email them at privacy@willistowerswatson.com.