

Milliman's Personal Data Privacy Policy for Candidates using Milliman's UltiPro platform

- This Privacy Policy explains what Milliman, Inc. and its affiliates (in the following "Milliman" or "we") does with your Personal Data, whether we are in the process of offering you a job, or continuing our relationship with you once we have hired you.
- It describes how we collect, use and process your Personal Data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.
- This Privacy Policy applies to the Personal Data of candidates applying for a position at Milliman or one of its group companies ("Candidates").
- If you are a Milliman employee, you should refer to [Hyperlink to: [Milliman's Personal Data Privacy Policy for Employees using the Milliman's UltiPro platform](#)].
- For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your Personal Data is Milliman.
- It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.
- If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

What kind of Personal Data do we collect?

- **CANDIDATE DATA:** In order to provide employment opportunities at Milliman that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, address, telephone, email, previous work experience and skills.

Depending on the type of Personal Data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to continue with our relationship.

Country-specific legal requirement:

In Germany, we collect details of our candidates' religious affiliation to facilitate our payroll process, as this is a necessary legal requirement.

How do we collect your Personal Data?

- **CANDIDATE DATA:** There are two main ways in which we collect your Personal Data:
 1. Directly from you; and
 2. From third parties.
- To the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

How do we use your Personal Data?

- **CANDIDATE DATA:** The main reason for using your personal details is to help you find employment or other work roles at Milliman that might be suitable for you.

Who do we share your Personal Data with?

CANDIDATE DATA: We may share your Personal Data with recruiters that may be assisting us in our placement process and the employees of our affiliates who are involved in the recruiting..

- **How long do we keep your Personal Data for?**

- Milliman retains Personal Data only as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or not prohibited by law. If you have consented to the processing of your Personal Data (“opt-in”), Milliman will retain and process your Personal Data until you withdraw your consent (“opt-out”), unless the Personal Data must be kept for administrative, legal or regulatory purposes, as for the management of the right to object, in which case Milliman will keep the minimum amount of Personal Data necessary and only for the time necessary to comply with such purposes. If Milliman has not received your opt-in, Milliman will delete your Personal Data once the purpose of the collection and processing of such Personal Data has been fulfilled and the adequate duration for documentation and backup storage of such Personal Data has lapsed. If you want to opt-out from the processing of your Personal Data, please send us an e-mail at: data.protection@milliman.com. Any complaints about un-solicited communication can be sent by e-mail to Milliman at the same e-mail address.

How can you access, amend or take back the Personal Data that you have given to us?

- Even if we already hold your Personal Data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues, which you raise.
- **Data Subject Access Requests (DSAR):** you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your Personal Data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, please send an e-mail to
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority.

How do we store and transfer your data internationally?

- Milliman is a global organisation – this is what enables us to offer the level of services that we do. In order for us to continue operating in this way, we may have to transfer or store your data internationally. Any transfer outside the EEA will be done in compliance with Model Clauses (contractual guarantees put in place by the European Commission) or in accordance with the Privacy Shield (i.e. the EU-US and Swiss-US Privacy Shield frameworks that were designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring Personal Data from the European Union and Switzerland to the United States).

Who is responsible for processing your Personal Data on the UltiPro website?

- Milliman controls the processing of Personal Data on the UltiPro platform.
- Ultimate Software (as Milliman's processor) is responsible for the secure operation of the UltiPro platform including the hosting of your data.
- Should you have any further questions on the Privacy Policy of Milliman or Ultimate Software or want further details, please go to the Ultimate Software [website](#), or the Milliman Inc. [website](#).
- **WEBSITE USERS:** We collect a limited amount of data from our website users, which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular.

HOW DO WE COLLECT YOUR PERSONAL DATA?

- **CANDIDATE DATA:** We collect Candidate Personal Data in three primary ways:
 1. Personal data that you, the Candidate, give to us;
 2. Personal data that we receive from other sources; and
 3. Personal data that we collect automatically.

Personal data you give to us

- Milliman needs to know certain information about you in order to assess your qualifications and if appropriate to provide a tailored job offer. This will enable us to provide you with the best opportunities at Milliman.
- There are numerous ways you can share your information with us. It all depends on what suits you. These may include:
 - Entering your details on the Milliman website or via an application form, as part of the registration process;
 - Leaving a hard copy CV at a Milliman recruitment event, job fair or office;
 - Emailing your CV to a Milliman employee or being interviewed by them;
 - Applying for jobs through a job aggregator, which then redirects you to the Milliman website; or
 - Entering your personal details on UltiPro.

Personal data we receive from other sources

- We also receive Personal Data about Candidates from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include Personal Data your referees may disclose personal information about you.

Personal data we collect automatically

- To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

VIDEOS

If you provide us with photos or videos of yourself we will store them on the platform and share them as we do with other data that we received from you to the extent authorized by the applicable laws.

HOW DO WE USE YOUR PERSONAL DATA?

Having obtained data about you, we then use it in a number of ways.

- **CANDIDATE DATA:** We generally use Candidate data in four ways:
 - Recruitment Activities;
 - to help us to establish, exercise or defend legal claims,

Here are some more details about each:

Recruitment Activities

- We have listed below various ways in which we may use and process your Personal Data for recruitment purposes, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.
- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Sending your information to other Milliman group companies or recruiting agencies, in order to apply for jobs or to assess your eligibility for jobs;
- Allowing you to participate in the interactive features of our services, when you choose to do so;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Milliman and third parties in relation to your recruitment;

To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we may use your Personal Data to help us to establish, exercise or defend legal claims.

HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

- We are committed to taking all reasonable and appropriate steps to protect the Personal Data that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.
- If you suspect any misuse or loss of or unauthorised access to your Personal Data please let us know immediately.

HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

- One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

- To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- **Right to object:** this right enables you to object to us processing your Personal Data where we do so for our legitimate interest.
- If your objection relates to us processing your Personal Data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
 - we can show that we have compelling legitimate grounds for processing which overrides your interests; or
 - we need the Personal Data for the establishment, exercise or defense of legal claims.
- **Right to withdraw consent:** Where we have obtained your consent to process your Personal Data for certain activities you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.
- **Data Subject Access Requests (DSAR):** You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.
- **Right to erasure:** You have the right to request that we erase your Personal Data in certain circumstances. Normally, the information must meet one of the following criteria:
 - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
 - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
 - the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
 - it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
 - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.
- We would only be entitled to refuse to comply with your request for one of the following reasons:
 - to exercise the right of freedom of expression and information;
 - to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
 - for public health reasons in the public interest;
 - for archival, research or statistical purposes; or
 - to exercise or defend a legal claim.
 - When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

- **Right to restrict processing:** You have the right to request that we restrict our processing of your Personal Data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.
- The circumstances in which you are entitled to request that we restrict the processing of your Personal Data are:
 - where you dispute the accuracy of the Personal Data that we are processing about you. In this case, our processing of your Personal Data will be restricted for the period during which the accuracy of the data is verified;
 - where you object to our processing of your Personal Data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your Personal Data;
 - where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
 - where we have no further need to process your Personal Data but you require the data to establish, exercise, or defend legal claims.
- If we have shared your Personal Data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your Personal Data.
- **Right to rectification:** You also have the right to request that we rectify any inaccurate or incomplete Personal Data that we hold about you. If we have shared this Personal Data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete Personal Data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.
- **Right of data portability:** If you wish, you have the right to transfer your Personal Data between data controllers. In effect, this means that you are able to transfer your Milliman account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) Personal Data that we process automatically (i.e. without any human intervention); (ii) Personal Data provided by you; and (iii) Personal Data that we process based on your consent or in order to fulfil a contract.
- **Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority.
- If you would like to exercise any of these rights, or withdraw your consent to the processing of your Personal Data (where consent is our legal basis for processing your Personal Data), you may send an email to data.protection@milliman.com. Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- You may ask to unsubscribe from job alerts at any time.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

- So you want to know more about how we store and transfer your data internationally? In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data may be transferred:
 - between and within Milliman and its affiliated entities;
 - to third parties (such as advisers or other suppliers to Milliman and its affiliated entities);
 - to a cloud-based storage provider; and
 - to other third parties, as necessary for the purpose of the processing hereunder.
- We want to make sure that your data are stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area, EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) or Switzerland where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:
 - by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of Personal Data by data controllers in the EEA or Switzerland to data controllers and processors in jurisdictions without adequate data protection laws; or
 - by signing up to the EU-U.S. or Swiss-US Privacy Shield Framework for the transfer of Personal Data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
 - transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
 - where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract; or
 - where you have consented to the data transfer: in which case however, we still rely on appropriate guarantees to ensure that the transfer of Personal Data to a country outside the EEA is protected.
- To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your Personal Data with to ensure that your personal information is treated by those third parties in a way that is consistent with this Privacy Policy and which respects the law on data protection.

PRIVACY SHIELD

- For personal information received from candidates in the European Union or European Economic Area, Milliman, Inc. is committed to handling your personal information in accordance with this Policy and the EU-U.S. Privacy Shield, the Swiss-U.S. Privacy Shield, the EU General Data Protection Regulation (GDPR), and other data protection and privacy laws, as applicable. If there is any conflict between the terms of this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield, and to view Milliman, Inc.'s certification, candidates are invited to visit <https://www.privacyshield.gov/list>.
- Milliman, Inc.'s accountability for Personal Data that it receives under the Privacy Shield and subsequently transfers to Ultimate Software or another third party is described in the Privacy Shield Principles. In particular, Milliman, Inc. remains responsible and liable under the Privacy Shield Principles if third parties engaged by Milliman process the personal information in a manner inconsistent with the Principles, unless Milliman, Inc. proves that it is not responsible for the event giving rise to the damage.
- Milliman may disclose Personal Data and other related information in response to subpoenas, court orders, or other lawful requests by public authorities, including to meet national security or law enforcement requirements. Milliman may collect and share personal information in order to investigate or take action regarding illegal activities, suspected fraud, violations of Milliman's Terms of Use and employment policies,

to establish, exercise or defend legal claims, as permitted under the applicable laws, or as otherwise required by law or by government and regulatory entities.

INQUIRIES AND COMPLAINTS

- If you have inquiries or complaints regarding your Personal Data, you may send an email to data.protection@milliman.com. Complaints will be resolved internally in accordance with Milliman's complaints procedures. If efforts to resolve the matter internally are unsatisfactory, the matter may be referred to the American Arbitration Association (<http://www.adr.org/>), who serves as the selected independent recourse mechanism for resolving complaints. Milliman, Inc. has also chosen to cooperate with and comply with the advice of EU data protection authorities (DPAs) in relation to such unresolved complaints (as further described in the Privacy Shield Principles). Candidates may send an email to data.protection@milliman.com to be directed to the relevant DPA contacts. As further explained in the Privacy Shield Principles, a binding arbitration option will also be made available to candidates in order to address residual complaints not resolved by any other means. Milliman, Inc. is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).