



European Union (EU) Data Protection and Privacy of Personal Information Policy

It is the policy of FM Global to collect, use, and disclose personal information in a manner consistent with the laws of the countries in which it does business. This Policy sets out the privacy principles that the company follows with respect to personal information transferred from the EU to the United States.

The United States Department of Commerce and the European Commission have agreed upon certain data protection principles to enable U.S. companies to satisfy the requirement under EU law that adequate protection be given to personal information transferred from the EU to the United States. Consistent with its commitment to protect personal privacy, the company adheres to the Safe Harbor principles, as outlined below.

Personal Information

FM Global collects, processes, and stores personal information for the following purposes: determining, evaluating, and implementing employment-related actions and obligations; designing, evaluating, and administering compensation, benefits, and other human resources programs including employment-related education and training programs; evaluating employee performance; maintaining business records relating to past, present, and potential employees; supporting relationships with clients and vendors; and facilitating business communications and compliance with contractual and legal obligations.

Choice

If the company intends to use or disclose personal information based in a member country of the EU for reasons that are not consistent with the above, the affected person will be given the opportunity to opt-out of that use or disclosure. Sensitive information (e.g. medical, health, racial/ethnic origin) will not be collected, used, or transferred for any other purpose unless the affected person expressly agrees.

Data Integrity

The company uses personal information only in ways compatible with the purposes for which it was collected or subsequently authorized by the individual. The company will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

Transfers to Agents

The company may transfer personal information to a third party acting as its agent (e.g., consultants, tax advisors and preparers, accountants, auditors, lawyers, financial services and benefit vendors) if the third party confirms that it provides the same level of protection required by these principles. In such case, notice and choice are not provided to the affected person unless the company intends the agent to use personal information for a purpose incompatible with the purpose for which it was collected.

Access and Correction

Upon request, the company will grant reasonable access to relevant personal information and will take steps to permit corrections, amendments, or deletions of information that is demonstrated to be inaccurate or incomplete.

Security

The company will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

Enforcement

Any employee that the company determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment. The company self-certifies with the U.S. Department of Commerce as a data controller. The U.S. Federal Trade Commission is empowered to investigate complaints and seek redress for individuals in case of company noncompliance with Safe Harbor principles.

Dispute Resolution

The company will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in a prompt, effective, and equitable manner, in accordance with company practices and consistent with the principles underlying Safe Harbor requirements.

Verification

The company conducts an annual self-assessment to verify that this Policy is published and implemented, and that the company conforms to these principles.

This Policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles.