

Privacy and Confidentiality Policy

It is the policy of FM Global to restrict the collection, use and disclosure of confidential and private information in a manner consistent with statutory, regulatory and contractual requirements. As such, FM Global has established a safe harbor for confidential and private information operated by FM Global or those subject to an agreement between an outside party and FM Global, regardless of geographic location.

Safe Harbor

FM Global may have access to personally identifiable or confidential information belonging to, or relating to, its policyholders, partners, vendors, consultants, subcontractors, temporaries or employees. FM Global will collect, use and disclose such information in a manner consistent with the laws of the countries in which FM Global does business. This Policy reflects the “Safe Harbor” principles that FM Global follows with respect to personal information transferred between the countries of the European Union, United States, and Switzerland, and consistent with what has been agreed to by the U.S. Department of Commerce and the European Commission.

Data Collection

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.

FM Global collects, processes and stores only the essential company information of its policyholders and partners specifically needed to fulfill the business relationship. Contracts may further clarify the relationship and obligations regarding collection.

Choice

If FM Global intends to use or disclose the data it collects for reasons that are not consistent with the above, the affected party 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 party expressly agrees.



Transfers to Agents

FM Global may transfer collected information to a third party acting as its agent if the third party confirms that it provides the same level of protection required by these principles. In such cases, notice and choice are not provided to the affected party unless FM Global intends for the agent to use the information for a purpose incompatible with the purpose for which it was collected.

Data Integrity, Access and Correction

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

At the request of the party and as required by law, FM Global will grant reasonable access to relevant information and will take steps to permit corrections, amendments or deletions of information that is demonstrated to be inaccurate or incomplete.

Security and Verification

FM Global will take reasonable precautions to protect the information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

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

Enforcement and Dispute Resolution

Any employee that FM Global determines is in violation of this policy will be subject to disciplinary action up to and including termination of employment. FM Global 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.

FM Global 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.

