

American International Group, Inc.
Employee and Non-Employee Worker Personal Information Notice

DIFC Supplement

Please review this Supplement in connection with the Global Employee and Non-Employee Worker Personal Information Notice (the “Notice”). Each term defined in the Notice and used in this Supplement without definition shall have the meaning assigned to it in the Notice.

Who Is Responsible For Your Personal Information

Each AIG affiliated entities that processes your Personal Information is responsible for looking after it in accordance with this Notice, our internal standards and procedures, and the requirements of data protection law.

If you are an Employee or Non-Employee Worker, the AIG affiliated entities that employs or engages you will be the main company responsible for your Personal Information. A list of the key AIG affiliated entities that are data controllers is available here www.aig.com/datacontrollers.

If you are a member of an AIG pension plan, the Trustees will be responsible for the Personal Information held and processed by the Trustees in connection with that plan.

How and Why We Process Your Personal Information

We will process your Personal Information for a variety of different purposes during the course of your employment or engagement, and after you have ceased to be employed or engaged by us. The purposes for which we process Personal Information, along with type of Personal Information and why, are set out in the table below:

Description of Purpose	Examples	Types Of Personal Information	Why We Process Personal Information
A. Managing and Administering the Workforce	Managing work activities and personnel generally, including recruitment, appraisals, performance management, promotions and succession planning, rehiring, administering salary, payment administration and reviews, wages and other awards such as stock options, stock grants and bonuses, healthcare where permitted by applicable governing law, pensions and savings plans, training, leave, managing sickness leave, transfers, secondments,	<ul style="list-style-type: none">✓ Personal Details✓ Immigration Related Details✓ Compensation, payroll and Expenses✓ Position✓ Talent management information✓ Management records	<ul style="list-style-type: none">✓ It is in our legitimate interests or those of a relevant third party✓ Needed to perform a contract with you or prepare to enter into a contract with you

	<p>honoring other contractual benefits, providing employment references, loans, performing workforce analysis and planning, performing Employee and Non-Employee worker surveys, performing background checks (including using your Personal Information where permitted by applicable governing law, to undertake: ID checks, address verification, education and/or professional qualification verification, employment history verification, criminal or conduct checks, credit/bankruptcy/financial integrity checks, adverse media search, directorship search, regulatory checks (e.g. bribery and anti-corruption compliance), sanctions screening against sanction lists to identify criminal or fraudulent activity, terrorist watch-list search), investigating and managing disciplinary matters (including non-compliance with the AIG Code of Conduct in the case of employees) and fraud, grievances and terminations, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of training requirements and career development activities and skills, administering apprenticeship schemes, creating and maintaining one or more internal Employee and Non-Employee Worker directories, and promoting diversity and preventing discrimination.</p>	<ul style="list-style-type: none"> ✓ Pension records ✓ Data related to System, Device and Application Usage ✓ Sensitive Personal Information 	<ul style="list-style-type: none"> ✓ Needed to comply with legal requirements ✓ As may be permitted under applicable law, and to the extent an alternative valid justification does not apply, with your consent
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B. Maintaining Business Continuity	<p>Ensuring business continuity (including contacting you using your personal contact details (e.g. personal email addresses or mobile phone numbers)), facilitating communication with you at AIG office, when travelling, during working from home absent an emergency, protecting the health and safety of employees and others, safeguarding IT infrastructure, office equipment and other property, and facilitating communication with you and your nominated contacts in an emergency via any means we deem necessary to reduce any risk to you or others (for example by contacting you using your personal contact details by calling or sending SMS text messages).</p>	<ul style="list-style-type: none"> ✓ Personal Details ✗ Immigration Related Details ✗ Compensation, payroll and Expenses ✗ Position ✗ Talent management information ✗ Management records ✗ Pension records ✗ Data related to System, Device and Application Usage ✗ Sensitive Personal Information 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✓ Needed to comply with legal requirements
C. Managing and Improving Our Business and Operations	<p>Operating and managing IT and communications systems, managing product and service development, improving products and services, managing and securing company premises and other assets, allocating company assets and human resources, strategic planning, project management, business continuity, compilation of audit trails and other reporting tools, maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, re-organizations or disposals and integration with purchasers.</p>	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✓ Position ✓ Talent management information ✗ Management records ✓ Pension records ✓ Data related to System, Device and Application Usage 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✗ Needed to comply with legal requirements

		<ul style="list-style-type: none"> ✗ Sensitive Personal Information 	
D. Complying with Legal, Regulatory Requirements and Internal Policies and Procedures	Complying with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations, performing background checks (as detailed above in section A (Managing and Administering the Workforce) above), conducting audits, compliance with government inspections and other requests from government or other public authorities, complying with guidance issued by our regulators, and responding to legal process such as subpoenas.	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✓ Position ✗ Talent management information ✓ Management records ✓ Pension records ✓ Data related to System, Device and Application Usage ✓ Sensitive Personal Information 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✓ Needed to comply with legal requirements
E. Defending Legal Rights	Pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, conducting investigations, and enforcing with internal policies and procedures.	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✓ Position ✓ Talent management information ✓ Management records ✓ Pension records ✓ Data related to System, Device and Application Usage 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✓ Needed to comply with legal requirements

		<ul style="list-style-type: none"> ✓ Sensitive Personal Information 	
F. Monitoring Workers and Systems	<p>Monitoring – which includes the systematic and repetitive surveillance, tracking, analyzing, observing and/or reviewing an individual – designed to ensure compliance with internal policies and for fraud and crime prevention including monitoring of (i) electronic and verbal communications, including telephone, email, instant messaging, and other electronic messages, (ii) use of and access to information systems and technology made accessible by AIG, including internet usage and activity, IT hardware and software content, and other company resources, and (iii) AIG premises, including via CCTV and building access logs.</p> <p>For more information about how and why AIG monitors individuals, please review AIG’s Global Monitoring Notice.</p>	<ul style="list-style-type: none"> ✓ Personal Details ✗ Immigration Related Details ✗ Compensation, payroll and Expenses ✓ Position ✗ Talent management information ✗ Management records ✗ Pension records ✓ Data related to System, Device and Application Usage ✗ Sensitive Personal Information 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✗ Needed to perform a contract with you or prepare to enter into a contract with you ✓ Needed to comply with legal requirements
G. Administering Pension & Retirements (where applicable)	<p>Trustees of the AIG Pension Plan or Trustees of the AIG Retirement Savings Plan (together the Trustees), of which you are a member (if applicable) will process your Personal Information for management and administration of the plans (where applicable), to make decisions about the pension plans (e.g. to process transfer requests or to make decisions about the payment of benefits) and to carry out the duties of the Trustees.</p>	<ul style="list-style-type: none"> ✓ Personal Details ✓ Immigration Related Details ✓ Compensation, payroll and Expenses ✗ Position ✗ Talent management information ✗ Management records 	<ul style="list-style-type: none"> ✓ It is in our legitimate interests or those of a relevant third party ✓ Needed to perform a contract with you or prepare to enter into a contract with you

		✓ Pension records ✗ Data related to System, Device and Application Usage ✗ Sensitive Personal Information	✗ Needed to comply with legal requirements
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Data protection law seeks to ensure that the way Personal Information is processed is fair and this includes telling you the legal justification we rely on for using your Personal Information. While the law provides several legal justifications, the table above describes the main legal justifications that apply to our purposes for using Personal Information.

We are required to obtain Personal Information from you to comply with applicable legal requirements, and certain Personal Information is needed to enable us to fulfil the terms of our contract with you (or someone else), or in preparation of entering into a contract with you (or someone else), or for pursuing a right and/or legitimate interest of ours or of third parties. Where necessary we will inform you of this at the time that we are obtaining the Personal Information from you. In these circumstances, if you do not provide the relevant Personal Information to us, this may impact our ability to perform our obligations to you as your employer or the company that engages you. If you would like further information please contact us using the details in Section 12 of the Notice ('How You Can Contact Us').

Where we rely on our (or a third party's) legitimate business interests to justify the purposes for which we process your Personal Information, those legitimate business interests will typically be one or more of the following:

- pursuit of our commercial activities and objectives, or those of a third party;
- compliance with applicable legal and regulatory obligations and any codes of conduct (for example, by carrying out background checks or otherwise preventing, detecting or investigating fraud or money laundering);
- improvement and development of our business operations and service offering, or those of a third party;
- protection of our assets, information, business, shareholders, employees and customers, or those of a third party (for example, ensuring IT network and information security and enforcing claims, including debt collection, health and safety);
- in respect of Pension Scheme Administration (where applicable) our legitimate interest is to ensure the pension plan is operated effectively and appropriately; or
- to keep our IT network/systems secure, prevent/detect crime and ascertain compliance with internal roles for using the system.

We collect, use and disclose Personal Information in connection with matters of important public interest, for instance when complying with our obligations under anti-money laundering and terrorist financing laws and regulations, and other laws and regulations aimed at preventing financial crime. In these cases, the legal justification for our processing of Personal Information is that the processing is necessary for matters of public interest. Additional justifications also apply depending on the circumstances (for example the requirements of governing laws applicable to you or us).

Special Categories of Personal Information

Only as permitted by governing law applicable to your or us these more sensitive special categories of Personal Information include Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning an individual's sex life or sexual orientation.

For processing of more sensitive special categories of Personal Information we will, to the extent permitted by applicable local law, rely on either:

- one or more of the other legal justifications set out in the table above and typically one of the following five additional justifications (however other legal justifications may be available), to the extent permitted by governing law applicable to you or us:
 - the processing is necessary for the carrying out of obligations and exercising our or your specific rights under employment laws;
 - the processing is necessary for the establishment, exercise or defense of legal claims, or whenever courts are acting in their judicial capacity (for example, when a court issues a court order requiring the processing of Personal Information);
 - the processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis or the provision of health or social care or treatment;
 - the use is proportional and necessary to protect Data Subjects from potential bias or inaccurate decision-making; or
 - the use is necessary to protect members of the public against dishonesty, malpractice, incompetence or other improper conduct of persons providing banking, insurance, investment, management consultancy, information technology services, accounting, or other services or commercial activities.
- your consent (but only in exceptional circumstances).

Additional legal justifications may also be available in the country in which you are based and we may also rely on these justifications from time to time.

Processing of Personal Information relating to criminal convictions and offences is subject to the requirements of governing law applicable to you or us.

Your Personal Information Rights

In addition to the data protection rights listed in Section 10 of the Notice ('Your Personal Information Rights'), the following rights may be exercised in relation to your Personal Information:

Right	Description
Right to data portability	This right allows you to obtain your Personal Information in a format which enables you to transfer that Personal Information to another organization, if this is technically feasible. However, this right only applies in certain circumstances.
Right to withdraw consent to processing of Personal Information	Where we have relied upon your consent to process your Personal Information, the right to withdraw that consent.

If you wish to exercise any of the above rights, please contact us using the details which may be found in the Notice under Section 12, 'How You Can Contact Us'.

This Supplement was last updated on June 25, 2021.