



Republic of the Philippines  
Department of Finance  
**INSURANCE COMMISSION**  
1071 United Nations Avenue  
Manila



Legal Opinion (LO) No.:	2018-17
Date:	19 November 2018

**MR. JAMES G. MATTI**

President

WILLIS TOWERS WATSON

INSURANCE BROKERS PHILIPPINES, INC.

23/F W City Center, 7<sup>th</sup> Avenue

corner 30<sup>th</sup> Street, Bonifacio Global City

Taguig City, 1634

**SUBJECT: Outsourcing of Third Party/ Payment Gateway  
Provider for Premium Collection on behalf  
of a Brokering Company**

**Dear Mr. Matti:**

This pertains to your letter informing this Commission regarding your newly developed web-based system called BenefitsMarketplace, a tool which your clients can use to manage employee benefits plans.

In line with this, you seek our guidance on the following areas which relate to the implementation of your system:

1. May the Willis Towers Watson Insurance Brokers Philippines, Inc. ("Willis Brokers") outsource the premium collection, through on-line payment, from the individual employees using a third party/payment gateway provider (a non-regulated entity) and thereafter, the latter shall remit the premiums collected to the insurer?
2. In an instance where Willis Brokers and the payment gateway provider collect premium payments from individuals, can deductions of certain percentage made as service fee from premiums collected, provided that:
  - a. The fee deducted is agreed with the insurer; and
  - b. The insurer bears the fees deducted?
3. Where Willis Brokers will be involved in the referral of employees of corporate clients to wellness and lifestyle program and/or vendors, may Willis Brokers collect the fees/payment on behalf of the product vendors and remit them to the latter?