

**AVIVA PLC REGISTERED SHAREHOLDER'S PRIVACY POLICY**

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## WELCOME

### to the Aviva Plc Privacy Policy

In this privacy policy you can find out more about:

- what personal information we use in relation to registered shareholders
- how we collect, use and share personal information within Aviva and with our business partners
- your rights in relation to any personal information we hold about you
- how you can contact us with any questions you may have about privacy

This privacy policy is issued on behalf of Aviva plc operating within the United Kingdom, who is the relevant controller of your personal information. When we mention "Aviva plc", "we", "us" or "our" we are referring to the relevant company in the Aviva Group that processes your personal information.

This privacy policy extends to the share registry services which are carried out by Computershare Investor Services PLC ("**Computershare**"). We have appointed Computershare under the rules of the Companies Act to manage our register of shareholders. Computershare's role as registrar includes keeping an up-to-date record of shares held by shareholders, administration of dividends, managing share transfers, issuing share certificates and supporting other regulatory functions. In carrying out registry services, Computershare processes personal information about you as a shareholder on our behalf.

The information in this privacy policy is important, so we have tried to make it very easy to navigate. Use the links to find out more about how we collect, use and share personal information. You can also [*click here*] to download a full copy of this privacy policy.

If you are also an Aviva plc customer, you should refer to the separate privacy notices which govern the personal information which we collect from you in relation to the Aviva products or services you take as a customer. Read those privacy notices with care, because they will tell you which Aviva company is responsible for managing your personal information and provide more specific information about how we will use your personal information in relation to that product.

If you use any of the apps and engagement tools we make available to our shareholders (for example the Computershare Investor Centre, Share Dealing Site, Proxy Voting Site and Employee Share Plans site) ("**Online Services**"), you should be aware of the additional privacy notices which we make available for the relevant Online Service. This privacy policy supplements, but does not override, those notices.

This privacy policy is separate from and not intended to override the terms of any contract we have with you or your rights under data protection laws.

We will amend this privacy policy from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check these pages for the latest version.

## **WHAT PERSONAL INFORMATION WE COLLECT WHEN YOU BECOME A REGISTERED SHAREHOLDER**

Aviva plc will collect and use personal information such as your name, contact details, the votes you cast and the Reference Number attributed to you by us as an Aviva shareholder. We collect this personal information when you provide details to us directly or through your agent, stock broker or share plan administrator, for example, on shareholder application forms or stock transfer forms. We also collect personal information when you register for or use any of our Online Services or our websites.

We use your personal information (with the support of our registrar, Computershare):

- to manage your shareholding interest in Aviva
- to allow you to exercise your rights as a shareholder
- to keep our shareholder register up-to-date (for example where you move address or change your name)
- to contact you with shareholder related information, including our shareholder newsletter and important information about dividend distributions, shareholder resolutions, reports and meetings, including details of our Annual General Meeting
- to address any queries you raise with us
- to provide you with information about benefits that you are entitled to receive as a shareholder, including special offers and discounts that allow you to engage better with Aviva - many of these benefits are available through MyAviva which is a separate site operated by [Aviva UK Limited]. We will share your information with Aviva UK to give you the option of registering with MyAviva, so that you can access these shareholder offers and discounts. If you register with MyAviva, you should read the separate privacy notice issued by Aviva UK which governs use of personal information on the MyAviva site.

We encourage you to use the Investor Centre to manage the information we provide to you as it provides a secure online platform to help you manage your shareholdings and communication preferences.

If you use our Online Services or websites we use cookies and other online tools to collect information about how you use and navigate our sites, including your IP address. We use this

information to improve the quality and design of our Online Services and websites and create new features and services. We explain more about these tools in our [Cookies Policy](#).

**HOW WE COLLECT, USE AND SHARE PERSONAL INFORMATION**

*These links can be applied to expand on specific privacy practices*

**RESPECTING PRIVACY RIGHTS**

**SHAREHOLDER DISCOUNTS, OFFERS AND MANAGING YOUR PREFERENCES**

**HOW WE SHARE YOUR PERSONAL INFORMATION**

**WORKING WITH REGULATORS AND FRAUD PREVENTION AND DETECTION AGENCIES**

**RETAINING PERSONAL INFORMATION IN OUR SYSTEMS**

**PROTECTING PERSONAL INFORMATION OUTSIDE THE UK**

## **Respecting privacy rights**

We are committed to collecting and using personal information in accordance with applicable data protection laws.

Wherever we collect or use personal information, we will make sure we do this for a valid legal reason. This will be for at least one of the following purposes:

- to manage your shareholder rights and our obligations to you as a shareholder, in accordance with our Articles of Association and applicable laws;
- to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities;
- to operate and improve our business and keep our shareholders informed about our products and services;
- for any other purposes we identify as relevant to further our business interests but never at the expense of your privacy rights

## **Shareholder discounts, offers and managing your preferences**

To protect privacy rights and give shareholders choice and control over the use of their personal information:

- We will always give the opportunity to 'opt out' of receiving direct marketing and you can contact [Computershare](#) at any time to change your marketing preferences.
- We include unsubscribe links in any email, or other direct marketing communication we send to you electronically.
- If you register with MyAviva, you can also change your marketing preferences within MyAviva.
- Please be aware that where you opt out of a particular type of marketing e.g. by mail or email, you are not automatically opted out of other forms of marketing. For example, after opting out of receiving emails, you may still be informed by post about discounts and offers that are relevant to you, unless you opt out of these as well.
- We take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

## **How we share your personal information**

We share personal information with a number of trusted third parties who work with us to help deliver our services, in order to fulfil our legal obligations or at your request. Such third parties include:

- Computershare, as our Registrar, who manages our share register and Georgeson, a subsidiary of Computershare, who provide a service to help trace our shareholders where records need to be updated;
- Aviva UK, to allow you the opportunity to access shareholder discounts and other shareholder offers through MyAviva;
- other members of Aviva Group, as necessary to operate our business;
- payment providers who help us manage dividend and other payments to our shareholders,;
- solicitors and professional service firms who provide us with legal support in relation to our services or any litigation;
- service providers who help operate our IT and back office systems;
- regulators who regulate how we operate, these include the Financial Conduct Authority, the London Stock Exchange, HMRC, the Takeover Panel and the Information Commissioner's Office;

In addition to the above, we will share your personal information

- if the law requires or permits disclosure, or there is a duty to the public to share or disclose your personal information e.g. for the purpose of verifying shareholdings or contacting shareholders about matters relating to the company, their shareholding or a related exercise of rights;
- with any third party at your request or with your consent;
- with any individual or company to whom we propose to transfer our obligations and rights in relation to the administration of our share register; and
- with any other person that requires access to or receipt of your personal information in connection with or as a result of any agreement we may have with or concerning you, or our arrangements with you.

#### **Working with regulators and fraud prevention and detection agencies**

We may use your personal information to help us to detect and prevent fraud, fight financial crime and meet our regulatory responsibilities. This may involve checking public registers (e.g. the electoral roll or registers of county court judgments, bankruptcy orders or repossessions), conducting online searches from websites and other information sharing platforms and using databases managed by credit reference agencies and other reputable organisations. This will help us verify your identity and carry out tracing exercises. We may also share your information and undertake searches with third party organisations such as public bodies, credit reference agencies, fraud prevention agencies and our regulators (which include the **FCA**, and **ICO**).

If you give us false or inaccurate information and we suspect fraud, we will record this to prevent further fraud and money laundering.



We can supply on request further details of the agencies and databases we access or contribute to and how this information may be used. If you require further details contact Computershare Investor Services PLC The Pavilions, Bridgwater Road Bristol, BS99 6ZZ, United Kingdom.

### **Retaining personal information in our systems**

We generally only keep personal information for as long as is reasonably required for the reasons explained in this privacy policy. We do keep certain records - which may include personal information - for more extended periods e.g. after you have sold your shareholding, if we need to do this to meet legal, regulatory, tax or accounting needs. For instance, we are required to retain an accurate record of dealings with us, so we can respond to any complaints or challenges from you or others which might be raised later. We will also retain files if we reasonably believe there is a prospect of litigation.

We maintain a data retention policy which we apply to the records we hold.

### **Protecting personal information outside the UK**

Some of the organisations we share information with may be located outside of the European Economic Area ("EEA"). We will always take steps to ensure that any transfer of information outside the EEA is carefully managed to protect your privacy rights:

- transfers within the [Aviva Group](#) will be covered by an agreement entered into by members of the Aviva Group (an intra-group agreement) which contractually obliges each member to ensure that your personal information receives an adequate and consistent level of protection wherever it is transferred within the Group;]
- where we transfer your data to non-[Aviva Group](#) members or other companies providing us with a service, we will obtain contractual commitments and assurances from them to protect your personal information. Some of these assurances are well recognised certification schemes such as standard contractual clauses and the EU - U.S. Privacy Shield for the protection of personal information transferred from within the EU to the United States of America;
- we will only transfer personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights; and
- any requests for information we receive from law enforcement or regulators will be carefully validated before personal information is disclosed.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please click on [your rights](#) section.

## **YOUR RIGHTS**

You have legal rights under data protection laws in relation to your personal information. Click on the links below to learn more about each right you may have.

- [To access personal information](#)
- [To withdraw consent](#)
- [To correct / erase personal information](#)
- [To restrict how we use personal information](#)
- [To object to how we use personal information](#)
- [To ask us to transfer personal information to another organisation](#)
- [To object to automated decisions](#)
- [To understand how we protect personal information transferred outside Europe](#)
- [To find out more about how we use personal information](#)

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to do what you have asked, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

### **To access personal information**

You can ask us to confirm whether or not we have and are using your personal information.

You can ask to get a copy of your personal information.

### **To withdraw consent**

In circumstances where we have asked for your consent to use your information, you will always have the right to withdraw such consent. Please [contact us](#) if you want to do this. If you withdraw your consent, we may not be able to provide certain products and services to you. If this is the case, we will tell you at the time you ask to withdraw your consent.

### **To correct / erase personal information**

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but will need to verify the accuracy of the information first.

You can ask that we erase your personal information if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal information if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, where we have used it unlawfully or where we are subject to a legal obligation to erase your personal information.

We may not always be able to comply with your request, for example where we need to keep using your personal information in order to comply with our legal obligation or where we need to use your personal information to establish, exercise or defend legal claims.

### **To restrict our use of personal information**

You can ask that we restrict our use of your personal information in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal information is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but you need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal information but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal information following a request for restriction where we have your consent to use it, or you need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

### **To object to use of personal information**

You can object to any use of your personal information which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal information if we can demonstrate that we have a compelling legitimate interest to use the information.

### **To request a transfer of personal information**

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we asked for your consent to use your personal information. This right does not apply to any personal information which we hold or process based on our legitimate interest or which is not held in digital form.

#### **To contest decisions based on automated decision making**

We do not currently make any decisions based on automatic decision making, using your personal information. If in the future we need to make decisions based on automatic decision making, we will inform you about this.

#### **To obtain a copy of our safety measures**

You can ask for a copy of, or reference to, the safeguards we have put in place when your personal information is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.

#### **You can contact us for more information**

If you are not satisfied with the level of information provided in this privacy policy, you can ask us about what personal information we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal information.

## **CONTACT US**

### **Please contact us**

The primary point of contact for all queries arising from this privacy policy or how your **personal information** is handled, including requests to exercise your rights set out in this policy, is Computershare's Data Protection Officer. The Data Protection Officer can be contacted in the following ways:

Email: [dataprotection@computershare.co.uk](mailto:dataprotection@computershare.co.uk)

Write to: The Pavilions, Bridgwater Road, Bristol, BS99 6ZZ

### **Our supervisory authority**

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with your local data protection supervisory authority at any time. In the UK this is **the ICO (Information Commissioner's Office)**. ([www.ico.org.uk](http://www.ico.org.uk))

We ask that you please attempt to resolve any issues with us before contacting the **ICO**.