

Group Archive Privacy Policy

1. Introduction

In this privacy policy you can find out more about:

- the personal information collected and used by the Aviva Group Archive
- legal rights you have 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 Central Services UK Limited ("Aviva", "we", "us" or "our") in respect of personal information processed within the Aviva Group Archive. We are the controller of such personal information. We are committed to collecting and using personal information in accordance with applicable data protection laws and will be transparent with users about how we collect or use personal information and that we always have a valid legal reason to do so.

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 check our website for the latest version.

Important Note: If you are an Aviva customer, you should refer to the separate privacy notices that have been issued to explain how the Aviva Group companies use personal information in relation to their products and services. These can be found on our customer website [<https://www.aviva.co.uk>].

2. Personal information

The Aviva Group Archive will collect, process, and share personal information if you:

- make an enquiry to access, or visit, the Aviva Group Archive
- donate material to the Aviva Group Archive
- are mentioned in any of the records held within the Aviva Group Archive.

You can find out more about how we collect and use personal information for each of these activities in the relevant sections below.

2.1 If you make an enquiry to access, or visit, the Aviva Group Archive

If you make an enquiry to access or visit the Aviva Group Archive, we will ask you to provide more information about the nature and scope of your enquiry and details about how we can contact you (e.g. to confirm your name, address, email and/or telephone number).

Our archivists will use this information to help locate material within the Aviva Group Archive that meet the scope of your research request and stay in touch with you as they research the Archive for relevant material. They may need to communicate with you to help clarify the items you are searching for and share the results of any searches conducted.

We only collect and use personal information as necessary for the legitimate interests of responding to research requests for access to material within the Aviva Group Archive.

We use trusted third-party service providers to help us operate the Aviva Group Archive who may on occasion have access to personal information when providing support to our systems.

2.2 If you donate material to the Aviva Group Archive

If you donate material to the Aviva Group Archive, we will ask you to provide more information about the background to the donation you are making and details about how we can contact you (i.e. to confirm your name, address, email and telephone number).

Our archivists will use this information to maintain a record of the material you are donating to the Aviva Group Archive and ensure there is a clear understanding between us about the basis on which the donation is made. We may ask you to sign our Accession Form confirming transfer of ownership of the material.

We only collect and use this personal information as necessary for the legitimate interests of maintaining an accurate record of donations made to the Aviva Group Archive, including confirming the basis of legal title.

We use trusted third-party service providers to help us operate the Aviva Group Archive who may on occasion have access to personal information when providing support to our systems.

2.3 If you are mentioned in any of the records held within the Aviva Group Archive

The records held by the Aviva Group Archive include historical information about our business activities over a 300-year period, including statutory records, minute books, annual reports, returns to the board of trade, registers of directors, shareholders' and financial records, as well as policy records, promotional material, photographs, and staff records.

These records may include personal information about our customers, employees, board members and shareholders. However, these records are closed and access is restricted unless they are over 100 years old, except in very special circumstances.

This policy is strictly applied and limits the way in which personal information is used within the Aviva Group Archive. Information about living individuals is only processed for the restricted purpose of helping to maintain the integrity of the Aviva Group Archive. These limited activities are necessary for the legitimate interests of maintaining the Aviva Group Archive as a coherent historical record, but do not cause any risk of adverse impact to individuals whose personal information is held.

2.4 Retaining personal information

Information within the Aviva Group Archive collection itself is held permanently, subject to our Collection Policy. Information relating to donations to the Aviva Group Archive is held permanently for historical and administrative purposes. Information relating to enquiries to the Aviva Group Archive is retained for seven years.

2.5 Protecting personal information outside of the United Kingdom

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 Aviva 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-US Privacy Shield for the protection of personal information transferred from within the European Union to the United States of America
- we will only transfer personal information to countries that 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
- 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 refer to the "Your Rights" section below.

3. Your Rights

You have legal rights under data protection laws in relation to the way we hold personal information, as set out below.

Important note: many of these rights only apply to the personal information we hold when you contact us with a research request or to make a donation and will not apply to personal information held within the Aviva Group Archive itself.

Additionally:

- 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.

3.1 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.

3.2 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 services to you. If this is the case, we will tell you at the time you ask to withdraw your consent.

3.3 To correct / erase personal information

You can ask that we rectify any information about you that 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.

3.4 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
- 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.

3.5 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.

3.6 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.

3.7 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.

3.8 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 (EEA). We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.

3.9 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.

4. Contact us

If you have any questions about this privacy policy or how to exercise your rights, please contact our Data Protection Officer.

Write to: The Data Protection Team, Aviva, Pitheavlis, Perth, PH2 0NH

Email us: DATAPRT@aviva.com

Your right to complain: If you're not happy with the way we're handling your information, you have a right to make a complaint with your local data protection supervisory authority at any time. In the UK this is the Information Commissioners Office (ICO) [<https://ico.org.uk>].

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