

Rainforest Explorers Competition

Supplemental Privacy Notice

1. Introduction

This notice supplements the main **Aviva Privacy Policy** (available at aviva.co.uk/privacy). It provides additional information about how personal information is used in connection with the **Rainforest Explorers** wildlife photography competition.

This notice is written for competition entrants (children aged 4–11) and their parents or guardians. We have used simple, clear language so that children can understand it too.

If anything in this notice is different from the main Aviva Privacy Policy, this supplemental notice applies to the competition. For anything not covered here, please refer to the main Privacy Policy.

2. Who We Are (Controllers)

Aviva Central Services UK Limited is the primary data controller for the competition. This means we are mainly responsible for deciding how your personal information is used.

- Registered office: 8 Surrey Street, Norwich, NR1 3NG
- Company number: 03259447

MHP Group Limited helps us run the competition. For most competition activities (such as managing entries, helping with judging, telling winners, and organising the masterclass), MHP acts as our **processor**. This means they handle data on our behalf and follow our instructions.

- Registered office: 60 Great Portland Street, London, W1W 7RT
- Company number: 14106014

For one specific purpose — **safeguarding activities** connected with the winners' photography masterclass — Aviva and MHP act as **joint controllers** under Article 26 UK GDPR.

What does “joint controller” mean?

Sometimes two organisations work together and both help decide how personal information is used. When this happens, they are called “joint controllers.” For keeping children safe at the masterclass event, both Aviva and MHP share responsibility for making sure your data is looked after properly.

3. Joint Controller Arrangements (Article 26 UK GDPR)

For safeguarding at the masterclass, Aviva and MHP have agreed to jointly decide how personal information is used and to share responsibilities. Here is how they have divided those responsibilities:

MHP's responsibilities:

- Being the primary point of contact for questions or requests about safeguarding data
- Providing clear information to participants about how their data is used (transparency)
- Obtaining parental/guardian consent where consent is the legal basis for using data

- Maintaining records of consent given
- Responding to data subject requests (such as requests to see, correct, or delete data) and carrying out follow-up actions
- Making sure that DBS (Disclosure and Barring Service) checks are completed for all adults who interact with children at the masterclass
- Appointing a designated safeguarding lead for the masterclass event
- Conducting a written safeguarding risk assessment before any event involving children, covering both safeguarding and outdoor safety
- Making sure all event staff and suppliers receive a safeguarding briefing before the masterclass
- Providing parents/guardians with full details of the masterclass arrangements (including venue, attendees, duration, and safeguarding measures) at least 14 days before the event
- Obtaining a signed consent form from the parent/guardian before the child takes part, including consent for any photography or filming
- Telling Aviva straight away (within 24 hours) if there is any safeguarding concern involving a child, and cooperating on any steps that need to be taken
- Telling Aviva promptly (within 48 hours) if there is any data breach affecting safeguarding data
- Making sure all safeguarding data collected is accurate and kept up to date
- Keeping its own records of the safeguarding data processing it carries out

Aviva's responsibilities:

- Deciding the overall purposes and objectives of the safeguarding activities (i.e., determining why and broadly how personal information is used for safeguarding at the masterclass)
- Working with MHP to agree what personal information needs to be collected, making sure only the minimum necessary information is gathered
- Approving any other organisations that MHP wishes to involve in the safeguarding activities, and checking that MHP is handling personal information properly (through audit rights)
- Responding to any data protection requests that come directly to Aviva — Aviva may either deal with these itself or pass them to MHP to handle
- Keeping its own records of the safeguarding data processing it carries out
- Working with MHP if there is ever a data breach or a safeguarding concern, including making sure the right people are told quickly

Important: Regardless of how responsibilities are divided between Aviva and MHP, parents and guardians can exercise their data protection rights against *either* Aviva or MHP.

4. What Personal information We Collect

(a) Competition Entry Data

We collect the following when you enter the competition:

- Entrant's first name and age category
- School name
- Parent/guardian name, email address, and telephone number
- Photograph submitted as competition entry (which may be personal information if individuals are identifiable in the photo)

- Short caption describing the photograph

(b) Winner/Masterclass Data (collected from winners only)

If you win, we will also collect:

- Winner's name, age, school, and region
- Parent/guardian contact details
- Travel booking information (addresses, travel preferences)
- Dietary requirements and accessibility needs
- Emergency contact details
- Photographs and video recordings of winners at the masterclass event

(c) Safeguarding Data (Joint Controller Processing)

To keep children safe at the masterclass, we collect:

- Children's names, ages, dates of birth, and school details
- Parent/guardian names, contact details, and emergency contact information
- Medical information, health conditions, allergies, or disabilities (this is special category data)
- Consent forms and parental authorisations
- DBS certificate information and safeguarding training records for supervising adults
- Incident reports and welfare concern records
- Attendance records and supervision logs

5. How We Collect Your Data

We collect personal information:

- Directly from a parent or guardian via the online entry form on the Aviva website Competition Page
- From competition winners and their families for masterclass logistics
- From adults involved in the masterclass (DBS information, safeguarding records)

6. Purposes and Legal Bases

The table below explains why we use your data and the legal reason (called a "legal basis") that allows us to do so.

Purpose	Legal Basis
Administering the competition (receiving entries, checking eligibility, facilitating judging, selecting winners, announcing results)	Performance of a contract (the competition Terms and Conditions)
Arranging and delivering the winners' masterclass (travel, accommodation, food, event management)	Performance of a contract (the competition Terms and Conditions)

Publishing winning and highly commended entries (online gallery, media)	Legitimate interests (promoting the competition and recognising achievements), subject to prior parental consent for publicity
Photography and videography at the masterclass for social media and media use	Consent (parental consent obtained via signed consent form)
Safeguarding (risk assessments, DBS checks, incident management, welfare monitoring, reporting to authorities) – Joint Controller Activity	Explicit consent (Article 9 UK GDPR) for special category data; Legal obligation where reporting to authorities is required

7. Who We Share Data With

We may share personal information with the following:

- **MHP Group Limited** — as processor for competition administration and logistics; and as joint controller for safeguarding
- **The Wildlife Trusts** — judging panel participation
- **Jamie Smart** — guest photographer at the masterclass
- **Media outlets** — winners' first names, age categories, school names, and photographs (only with prior parental consent)
- **Travel and accommodation providers** — for masterclass logistics
- **Relevant authorities** — local authority designated officers, police, emergency services (only in connection with safeguarding concerns)
- **Rainforest Subcontractors** — appointed by MHP (subject to Aviva's prior written approval and appropriate data protection contracts)

Note: Personal information will not be transferred outside the UK unless appropriate safeguards are in place.

8. How Long We Keep Your Data

We only keep personal information for as long as we need it. Here is how long we keep different types of data:

Type of Data	How Long We Keep It
Competition entry data (non-winners)	6 months following the end of the competition, then securely deleted
Winner/masterclass data	Term of the service order plus 12 months for post-campaign evaluation and media follow-up, then deleted
Photographs of winning/highly commended entries	Retained for the licence period of two years from the Closing Date
Safeguarding data (joint controller)	From collection until 12 months after the masterclass, to allow for post-event safeguarding enquiries or regulatory investigations
Masterclass expense/logistics data	Service order term plus 6 months for reconciliation

9. Children's Data and the Children's Code

Because this competition is for children, we follow the ICO's Age Appropriate Design Code (also known as the Children's Code). This means:

- We only collect the minimum amount of data we need to run the competition
- Children's data will NOT be used for marketing, profiling, or any purpose other than administering the competition and the masterclass prize
- No automated decision-making or profiling is applied to children's data
- We design our processes with the best interests of the child in mind

10. Your Rights

Under data protection law, you (or your parent/guardian on your behalf) have legal rights in relation to your personal information. Read below to learn more about each right you may have.

We may ask you for proof of identity when you make a request to exercise any of these rights. We do this to ensure we only disclose information to the right individual.

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

Your Right	What This Means (in simple terms)
Right of access	You can ask us to show you what information we have about you
Right to rectification	You can ask us to fix any information about you that is wrong
Right to erasure	You can ask us to delete your information
Right to restrict processing	You can ask us to stop using your information in certain ways
Right to data portability	You can ask us to give you a copy of your information in a format you can take elsewhere
Right to object	You can tell us you do not want us to use your information for a particular purpose
Right to withdraw consent	If we asked for your permission, you can change your mind and take it back at any time
Right to complain	You can complain about how we are handling your information

We may not always be able to do what you have asked. This is because your rights will not always apply, e.g. if it would impact the duty of confidentiality we owe to others, or if the law allows us to deal with the request in a different way. We will always explain to you how we are dealing with your request.

In some circumstances (such as the right to erasure or withdrawal of consent), exercising a right might mean that you can no longer participate in the competition or the masterclass (if selected as a winner).

How to exercise your rights:

For more information on your rights please see the [Aviva Other Parties Privacy Policy](#).

You can find the full contact details for Aviva, MHP, and general competition queries in Section 11 (How to Contact Us) below.

If you think we have done something wrong with your information, you have the right to complain directly to us (Aviva). You (or your parent/guardian) can complain using the contact details in Section 11 below, and we will let you know we have received your complaint and will respond to it.

If you are unhappy with how we have handled your data, you have the right to complain to the **Information Commissioner's Office (ICO)** at ico.org.uk.

11. How to Contact Us

Contact	Details
Aviva Data Protection Officer	The Data Protection Team, Aviva, PO Box 7684, Pitheavlis, Perth PH2 1JR Email: rainforestexplorers@aviva.com
MHP Data Protection Officer	Amanda Head of Data Protection & AI Governance, dpo-hub@next15.com
Competition queries	Rainforestexplorers@mhpgroup.com

12. Changes to This Notice

We may update this notice from time to time. If we make any changes, the updated notice will be published on the Competition Page on the Aviva website. We encourage you to check back regularly.

Last updated: 25/08/2026