

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.

We have appointed Computershare Investor Services PLC ("**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 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 download a full copy of this privacy policy.

If you are also an Aviva 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 have as a customer available [here](#). 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 or Computershare make available for the relevant Online Service. This privacy policy supplements, but does not override, those notices.

If you use Computershare's Online Services or websites they may use cookies and other online tools to collect information about how you use and navigate the sites, including your IP address. Computershare use this information to improve the quality and design of their Online Services and websites and create new features and services. Computershare explain more about these tools in their [Cookies Policy](#).

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.

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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

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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, details of shareholdings, the votes you cast and the bank account details linked to your shareholdings. 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.

HOW WE USE YOUR PERSONAL INFORMATION

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 main reasons for which we use personal information are:

- to manage your shareholder rights and our obligations to you as a shareholder, in accordance with our Articles of Association and applicable laws;
- to communicate with you about your shareholdings;
- to process payments including dividend payments;
- to provide you with information about our products and services (this may include marketing relating to products offered by other brands or companies within the Aviva group);
- to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities;
- to establish, enforce and defend our legal rights.

We use your personal information

Purpose of Processing	Legal Basis
<ul style="list-style-type: none">• 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)	<p>Processing is necessary to comply with our legal obligations including under section 113 of the Companies Act where the Company is required to maintain and keep up-to-date its register of members.</p> <p>Processing is necessary for our legitimate interests</p>

<ul style="list-style-type: none"> to contact you with shareholder related information, including 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 	
<ul style="list-style-type: none"> to comply with legal or regulatory obligations 	Compliance with a legal obligation
<ul style="list-style-type: none"> To establish, enforce or defend legal rights 	Compliance with a legal obligation Legitimate interests
<ul style="list-style-type: none"> to provide you with information about our products and services, including special offers and discounts that allow you to engage better with Aviva 	We process this data for our legitimate interests. To learn more about your rights in relation to this, please click on your rights section.

Where we rely on legitimate interests as our lawful basis, we are required to carry out a balancing test to ensure that our interests, or those of a third party, do not override the rights and freedoms that you have as an individual. The outcome of this balancing test will determine whether we can use your personal information for the purposes described in this Privacy Policy. Where we rely on the lawful basis of legitimate interests, the interests being relied upon will usually be:

- To further our business and commercial activities and objectives
- To provide you with information relating to your shareholdings
- To comply with our legal and regulatory obligations, guidelines, standards and codes of conduct
- To retain your shareholder record for a period of time in order to ensure we have appropriate records in place in respect of any future queries

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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;
- 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;
- 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; and
- as required under sections 114 and 116 of the Companies Act

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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 information please, [contact us](#).

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Retaining personal information in our systems

We keep Personal Information for as long as is reasonably required for the purposes explained in this Privacy Policy. We also keep records – which may include Personal Information – to meet legal, regulatory, tax or accounting needs.

If you would like more information about our data retention policy, please [contact us](#).

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Protecting personal information outside the UK

Sometimes we, or third parties acting on our behalf, may need to transfer Personal Information outside of the UK. We'll always take steps to ensure that any transfer of Personal Information outside the UK is carefully managed to protect your privacy rights and ensure that adequate safeguards are in place. This might include transfers to countries that the UK considers will provide adequate levels of data protection for your Personal Information (such as countries in the European Economic Area) or putting contractual obligations in place with the party we are sending information to. 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 group company to ensure that your Personal Information receives an adequate and consistent level of protection wherever it is transferred within the group.

For more information about data transfers and the safeguards we have put in place, please contact us.

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YOUR RIGHTS

Managing your preferences

You have control over our use of your Personal Information in relation to marketing communications. You can 'opt out' of receiving direct marketing. Our marketing communications include information to help you manage your marketing preferences and you can change your marketing preferences at any time. Write to us using the details in [contact us](#) or contact Computershare by email at AvivaSHARES@computershare.co.uk or by post at Computershare Investor Services PLC, The Pavilions, Bridgwater Road, Bristol BS99 6ZZ.

Please note that opting out of one type of marketing, e.g. by email or telephone, doesn't mean you will be opted out of all marketing. Bear this in mind when you manage your preferences.

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 decisions based on automated decision making](#)
- [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 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. 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 allow us to deal with the request in a different way. We will always explain to you how we are dealing with your request.

For further information about or to exercise any of your rights, please [contact us](#).

To access personal information

You may ask us for a copy of your Personal Information together with specified details about how we use your information. This is commonly known as a 'subject access request'.

If you wish to make a subject access request, please write to us using the details in [contact us](#).

YOUR RIGHTS

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.

YOUR RIGHTS

To erase personal information

You may ask us to erase your Personal Information, but this right only applies in certain circumstances, e.g. where:

- it is no longer necessary for us to use your Personal Information for the original purpose;
- our lawful basis for using your Personal Information is consent and you withdraw your consent; or
- our lawful basis is legitimate interests and there is no overriding legitimate interest to continue using your Personal Information if you object.

This isn't an absolute right and we have to balance your request against other factors such as legal or regulatory requirements, which may mean we cannot erase your Personal Information.

YOUR RIGHTS

To correct personal information

We do our best to ensure that your Personal Information is accurate and kept up to date. If you believe your information is inaccurate or incomplete, then please [contact us](#) to request that we amend or update it.

YOUR RIGHTS

To restrict our use of personal information

You may ask us to stop using your Personal Information in certain circumstances such as:

- where you have contacted us about the accuracy of your Personal Information and we are checking the accuracy;
- if you have objected to your Personal Information being used based on legitimate interests.

This isn't an absolute right and we may not be able to comply with your request.

[YOUR RIGHTS](#)

To object to use of personal information

You can object if you no longer wish to receive direct marketing from us.

You may also object where you have grounds relating to your particular situation and the lawful basis we rely on for using your Personal Information is our (or a third party's) legitimate interests. However, we may continue to use your Personal Information where there are compelling legitimate grounds to do so.

[YOUR RIGHTS](#)

To ask us to transfer personal information to another organisation

In some cases, you can ask us to transfer Personal Information that you have provided to us to another third party of your choice. This right only applies where:

- we have justified our use of your Personal Information based on your consent or the performance of a contract with you; and
- our use of your Personal Information is by electronic means.

[YOUR RIGHTS](#)

To object to 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.

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You can [contact us](#) for more information

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CONTACT US

Please 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, PO Box 7684, Pitheavlis, Perth PH2 1JR

Email us: DATAPRT@aviva.com

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 \(Information Commissioner's Office\)](#).

We ask that you please attempt to resolve any issues with us before contacting the [ICO](#).

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