

## Privacy Notice

This Privacy Notice describes how your personal data is collected and used through the Speak Up Service (“**Service**”).

For the purposes of this Privacy Notice “Data Protection Laws” means: all applicable laws from time to time relating to the control or processing of personal data and to data privacy, in the United Kingdom and Europe this includes without limitation the retained EU law version of the General Data Protection Regulation (EU) 2016/679 (as also applicable in the UK), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended) and (in the UK) the Data Protection Act 2018.

### 1. WHO ARE WE?

The Service is managed and administered by Navex Global (“**Navex**”). You can find out more about our relationship with Navex below. Aviva Central Services UK Limited is the data controller for the purposes of the Data Protection Laws and Navex Global are the data processor (together, “**we**”, “**us**” or “**our**”). Aviva Central Services UK Limited is a company incorporated in England & Wales with a registered number of 03259447 and whose registered office at 8 Surrey Street, Norwich, NR1 3NG.

### 2. WHAT INFORMATION IS COLLECTED ABOUT YOU?

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

This Service may capture the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by Aviva; (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e. description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

Note that the laws of some countries do not permit reports to be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

### HOW WE USE PERSONAL DATA AND FOR WHAT PURPOSES

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX in the European Union. NAVEX is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement. Aviva will also host the data where we extract any relevant information and share with investigating teams as appropriate

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of Aviva, including Human Resources, Finance, Internal Audit, Legal, Corporate Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities.

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet legal or financial requirements.

We may collect, use and share aggregated data, such as statistical data, for analysing the Service.

Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

### **3. OUR RELATIONSHIP WITH NAVEX**

Navex manages and administers the Services. This means that Navex will collect and process your information in the ways described in this privacy policy on our behalf, but we remain responsible for this. Navex may only collect and use your information in accordance with our instructions.

### **4. SHARING OF YOUR PERSONAL INFORMATION**

Aviva is part of the larger group of the [Aviva Group Companies](#). We may share your personal data with certain members of our Group as explained in the [Aviva Privacy Policy](#).

As above, we may also share your personal data with government agencies and regulatory bodies including the police and courts where necessary to do so.

### **5. HOW AND WHERE YOUR INFORMATION IS STORED, AND INTERNATIONAL TRANSFERS**

Sometimes we, or third parties acting on our behalf such as Navex, 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.

### **6. HOW LONG WE WILL KEEP YOUR INFORMATION?**

We generally only keep personal data for as long as is reasonably required for the reasons explained in this Privacy Notice. We do keep certain records for more extended periods if we need to do this to meet legal, regulatory, tax or accounting needs. For instance, we're required to retain an accurate record of your dealings with us, so we can respond to any complaints or challenges you or others might raise later. We'll also retain files if we reasonably believe there is a prospect of litigation. To support us in managing how long we hold your personal data and our record management, we maintain a data retention policy which includes clear guidelines on data deletion.

### **7. YOUR LEGAL RIGHTS**

You have various legal rights in relation to your personal data. In the UK and EU, these include the right to request access to your personal data, correct any mistakes on our records, erase or restrict records where they are no longer required, ask not to be subject to automated decision making if the decision produces legal or other significant effects on you, and data portability.

Your rights may differ depending on the jurisdiction and laws that apply. For more information on this and for full details in relation to your rights, including how to exercise them, please refer to the [Aviva Privacy Policy](#) (with respect of the UK) or contact us.

## **8. HOW TO CONTACT US**

If you have any questions about how we process your personal data or how to exercise your legal rights, please contact our Data Protection Officer as follows:

Email: [dataprt@aviva.com](mailto:dataprt@aviva.com)

Post: Data Protection Officer, Level 4, Pitheavlis, Perth PH2 9NH.

## **9. IF YOU'D LIKE TO SUBMIT A SUBJECT ACCESS REQUEST, PLEASE FILL OUT THIS FORM OR WRITE TO US AT THE ABOVE ADDRESS. YOUR RIGHT TO COMPLAIN**

If you are not happy with the way we are 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 Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).