

Aviva People

Privacy Notice

1. Introduction

This Privacy Notice explains how we collect and use **Personal Data** for:

- **Applicants and candidates**
- All **current colleagues**, including employees, contractors, temporary and contingent workers, consultants and supplier colleagues, directors and third parties whose information is provided to us in connection with one of these relationships (e.g. next-of-kin, emergency contact information and dependants)

This Privacy Notice is issued on behalf of the **Aviva Group companies** that operate within the United Kingdom (including but not limited to Aviva Employment Services Limited, Aviva Central Services Limited, Aviva Insurance Limited, Aviva Life Services UK Limited and Aviva Healthcare UK Limited or any other Aviva entity listed here <https://www.aviva.co.uk/services/about-our-business/about-us/aviva-company-details/>). When we mention “Aviva”, “we”, “us” or “our” we are referring to the relevant company in the Aviva Group that processes your Personal Data and those third parties who do so on our behalf. The Aviva Group companies will be the data Controller of your Personal Data.

It is important to read this Privacy Notice together with any separate privacy or fair processing notices that we may provide when collecting Personal Data from you. They will explain the Aviva Group company (or third party) which is legally responsible for managing your Personal Data and give more information about how we, and any third party, will use the particular Personal Data collected, your rights and in some cases details of any other provisions that may apply to the processing of that Personal Data.

We may seek your consent to certain processing. If consent is required for the processing in question, it will be sought from you separately (whether within a fair processing notice or otherwise) directly by us or a third party appointed to do so on our behalf. This helps us to ensure that it is freely given, informed and explicit.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If the way that Personal Data will be managed differs from this Privacy Notice or is incompatible with the original purpose the data was collected for, additional information regarding this processing will be provided to you and, if necessary, we will collect consent from you and explain the consequences if you choose not to consent. You should be aware that it is not a condition or requirement of your relationship with us that you agree to any request for consent from us.

We are committed to protecting the confidentiality and security of the information provided to us and have invested in robust technical, physical and organisational security controls to protect information against unauthorised access, damage, disclosure or loss.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with this Privacy Notice, where this is required or permitted by applicable law.

If you have any questions about how your Personal Data is managed, please refer to the further details provided in this Privacy Notice. If you continue to have questions, you can use the **contact details provided** to ask these to us directly.

Details of our Privacy Complaints procedure can also be found at the end of this Privacy Notice.

2. Personal Data We Collect and How it is Used

3. Who Personal Data is Shared With

Within Aviva, your Personal Data can be accessed by or may be disclosed internally. Your Personal Data may also be accessed by third parties, including suppliers, advisers, local and/or national authorities, law enforcement and government bodies.

The sharing of your data includes where this relates to your employment (for example with a supplier who processes payroll), and also where this relates to business activities you carry out on behalf of Aviva (for example with a supplier who manages travel bookings).

Where such third parties act as a data processor (for example a supplier who carries out pre-employment screening on our behalf) they carry out their tasks on our behalf and upon our instructions for the purposes set out in this Privacy Notice. In this case your Personal Data will only be disclosed to these parties to the extent necessary to provide the required services.

In some cases, the external recipient may be a data controller of your Personal Data. In such a case, a further notice may be provided to you regarding the processing of your Personal Data depending on the processing undertaken.

Internal Recipients

Internal recipients of your Personal Data include:

- local, and global People Function departments, including leaders and team members;
- local, and executive management, or other Aviva employees on their behalf, responsible for managing or making decisions in connection with your relationship with Aviva or when involved in a People Function process concerning your relationship with Aviva (including, without limitation, - colleagues from Company Secretarial, Compliance, Legal, Group Investigation and Information Security);
- colleagues in the Pension function and other areas relating to the provision of colleague benefits;
- system administrators;
- Group Tax, Treasury, Finance, Internal Audit and IT departments, the RemCo and the Global People Function information systems support team, where necessary for the performance of specific tasks or system maintenance by colleagues in those teams.

Such, personal data may also be shared with certain interconnecting systems such as recruitment systems and local payroll, benefits and IT systems.

In addition, certain basic Personal Data, such as your name, location, job title, contact information and any published skills and experience profile may also be accessible to other employees for the purposes set out in the Privacy Notice. This includes for example your profile on our HR System Workday.

External Recipients

Due to the size and complexity of our operations it is not possible to name each of our external data recipients in this notice.

The categories of third parties with whom your personal data may be shared, includes:

- our clients or customers;
- suppliers and service providers;
- tax authorities;
- regulatory authorities;
- our re-insurers;
- bankers;
- doctors/GPs or other medical professionals;
- IT administrators;
- Legal advisors;
- auditors;
- investors;
- consultants and other professional advisors;
- organisations involved in business reorganisation or divestment activities;
- payroll providers; and
- administrators and providers of our benefits.

Personal Data contained in our HR and other interconnecting systems may be accessible by providers of those systems, their associated companies and sub-contractors (such as those involved with the hosting, supporting and maintaining the framework of our HR information systems).

We expect these third parties to process any data disclosed to them in accordance with the contractual relationship between them and us and applicable law, including with respect to confidentiality and security.

In addition, we may share Personal Data with national authorities in order to comply with a legal obligation to which we are subject. This is for example the case within the framework of imminent or pending legal proceedings or a statutory audit.

4. All Colleagues

We carry out certain processing activities for all applicants, candidates and all current colleagues, including former employees applicants and candidates. To the extent that this Personal Data is not collected from you, it is generated internally through our management, People Function and payroll processes.

Click on the [sections](#) below to learn more about these activities and the types of Personal Data we typically process for all colleagues.

5. Applying For a Role

When you apply for a role with us, we will process Personal Data in order to manage and administer your application.

Click on the [sections](#) below to learn more about these activities and the types of Personal Data we typically process in connection with recruitment and selection.

6. As an Employee or Contingent Worker

We will collect, use and share Personal Data about you if you currently work at Aviva. To the extent that this Personal Data is not collected from you, it is generated internally through our management, People Function and payroll processes.

Click on the [sections](#) below to learn more about these activities and the types of Personal Data we typically process in connection with this relationship.

6. As an Employee or Contingent Worker continued

7. International Data Transfer

We share your Personal Data within the Aviva Group as set out in this Privacy Notice. Some of the people who access your Personal Data may not be in the same country as you and may be outside of the UK.

Any transfers within the Aviva Group will be covered by an intra-group agreement which gives specific contractual protections to ensure that your Personal Data receives an adequate and consistent level of protection wherever it is transferred within the Aviva Group.

In addition, some of the external organisations we share your Personal Data with may be located outside of the UK. We will always take steps to ensure that any transfer of information outside the UK is carefully managed to protect your privacy rights:

- we will only transfer Personal Data to countries which are recognised as providing an adequate level of legal protection (such as countries in the European Economic Area) or where we can be satisfied that alternative arrangements are in place to protect your privacy rights;
- transfer to service providers and other third parties will be protected by contractual commitments or other legally acceptable mechanisms that ensure an adequate level of protection; and
- any requests for information we receive from law enforcement or regulators will be carefully checked before Personal Data is disclosed

8. Retention

We will retain your Personal Data for as long as is reasonably necessary for the purposes explained in this Privacy Notice. In some circumstances we may retain your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax or accounting requirements.

In some cases, we may also retain your Personal Data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your relationship with us.

We maintain Group Record Retention Guidelines** which we apply to records in our care. Where your Personal Data is no longer required we will ensure it is either securely deleted or stored in a way that no longer identifies you.

We will generally retain your Personal Data only so long as it is required for purposes for which it was collected. This will usually be the period of your employment or other contract with us plus the length of any applicable statutory limitation period following your departure, although some data, such as pension information, may need to be kept for longer. We may keep some specific types of data, for example, tax records, for different periods of time, as required by applicable law and as set out in the Group Record Retention Guidelines

** You are only able to access the policies, guidelines and standards referred to in this Privacy Notice through Aviva World which you will have access to once you start working for Aviva. If there is a particular policy or standard you would like to see before then please speak with your recruitment consultant.

9. Legal Data Rights

You have legal rights under data protection laws in relation to your Personal Data. Please read sections below to learn more about each right you may have.

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 or update your 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.

In some cases, we may need to pause the response time while we wait for information from you. This may happen if:

- We need to confirm your identity; or
- We ask you to clarify or narrow your request, so we can deal with it properly.

If we pause the clock:

- We will tell you that we have done so;
- The response deadline will restart once we receive what we need from you.

We will only pause the deadline where this is genuinely necessary.

We may not always be able to fully address your request, 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.

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

10. Contacting Aviva

Contact Us

The primary point of contact for all issues arising from this Privacy Notice, including requests to exercise data subject rights, is our Data Protection Officer. The Data Protection Officer can be contacted in the following ways:

Email address: LifeDP@aviva.com

Postal address: **The Data Protection Team, Aviva, Pitheavlis, PH2 0NH.**

Raising Concerns

We have a duty to operate a clear and accessible complaints process. This means that:

- You can raise a privacy concern or complaint with us without needing to go to the regulator first;
- We will acknowledge your complaint and keep you informed as we look into it;
- We will explain our findings and, where appropriate, the steps we have taken or will take.

Our Supervisory Authority

If you are not happy with the way we are handling your information, you have a right to raise a concern with Aviva about this. Please contact us at the postal address or email address above if you would like to raise a concern. If you remain dissatisfied, you can also make a complaint to your local data protection supervisory authority. In the UK this is the Information Commissioners Office ('ICO').

www.ico.org.uk

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

11. Glossary

In this Privacy Notice we refer to certain key terms which it is important to understand, which we explain as follows:

Criminal Offence Data includes unproven allegations relating to the commission of a criminal offence; details of a specific crime; the fact that an individual has no criminal convictions; and data about penalties, conditions or restrictions placed on an individual.

GDPR and the DPA means the UK General Data Protection Regulation ('GDPR') as it forms part of domestic law in the UK, and the Data Protection Act 2018 ('DPA'). These laws apply to our processing and management of your Personal Data.

Personal Data is information that relates to a living individual. It includes information that may identify a person by name and contact details, or refer to associated information such as account activity, or personal preferences that can directly or indirectly identify an individual.

Processing means any and all actions we take with respect to your Personal Data, including (without limitation) managing, viewing, holding, storing, deleting, changing, using and saving.

Special Category Personal Data means any Personal Data relating to your health, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership.

Medical Information and **Diversity Information** form part of **Special Categories of Personal Data**.

Supervisory Authority means the supervisory authority for data protection, which in the United Kingdom is the information Commissioner's Office ('ICO') (<https://ico.org.uk/>).

12. Updates

We may amend this Privacy Notice from time to time for example, to keep it up to date or to comply with legal requirements or changes in the way we operate our business.

This Privacy Notice was last updated on 18 May 2026.

Aviva Employment Services Limited. Registered in England and Wales.
Registered office: 80 Fenchurch Street, London, United Kingdom, EC3M 4AE.
aviva.co.uk

PCCSC6165 05/2026 © Aviva

