

Aviva Pension Discovery Service Privacy Notice

This Privacy Notice describes how your personal data is collected and used through our Pension Discovery Service (“Service”).

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

Who are we?

The Service is provided by Aviva Administration Limited, which is a data controller for the purposes of the Data Protection Laws and FF Fabric Limited (“Fabric”) who are a data processor (together, “we”, “us” or “our”). Aviva Administration Limited is a company registered in England and Wales with company number 03424940 and whose registered office is Wellington Row, York, North Yorkshire, England, YO90 1WR. You can find out more about our relationship with Fabric below.

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).

In order for you to benefit from the Service we need you to provide us with certain personal data and other information. This includes basic personal data such as name, date of birth, address and contact details, as well as employment and pension information.

As part of the Service, we may also receive additional personal data about you from pension Scheme Administrators with whom you hold a pension.

How we use personal data and for what purposes

We will use the information provided by you to trace your pensions using various methods such as the Government Tracing Service (Pension Tracing Tool), and other online tools/services. This allows Aviva to understand who the Scheme Administrator(s) is/are for your pension(s). We may need further information from you or a Letter of Authority, we will contact you if this is required. We will then contact the Scheme Administrator(s) to obtain information relating to you and your pension(s). When the pension information is received, this will then be provided to you in the form of a pension report.

We rely on performance of a contract as the legal basis upon which we process your personal data as part of the Service.

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.

We may also carry out customer feedback surveys, but these will be done on an anonymous basis.

Fabric will also use information received from the Scheme Administrators to create a pension database to improve the Service, however this database will not contain any personal data, only information about the Scheme itself.

Continued overleaf.

Our relationship with fabric

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

Marketing

We may use Personal Information to send you direct marketing communications about our products and services that we feel you'll be interested in, subject to the marketing permissions we hold for you.

To find out more about the ways we may use your personal data for marketing and how to manage your preferences, please see the **Aviva Privacy Policy** or contact us using the details below.

Sharing of your personal information

Once we determine your pension Scheme Administrator(s), we will share your data with them to provide the Services. The Scheme Administrator(s) will be independent data controllers in respect of the personal data they hold about you.

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**.

How and where your information is stored, and international transfers

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

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 transactional 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.

Continued overleaf.

Your legal rights

You have various legal rights in relation to your personal data, including 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. For full details in relation to these rights, including how to exercise them, please refer to the **Aviva Privacy Policy** or contact us.

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

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

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).