

# Find and Combine Privacy Notice

#### 1. Introduction

This Find and Combine Privacy Notice applies to users ("**you**") who access and use the Find and Combine service. It explains what Personal Information we collect about you when you use the Find and Combine service and how we use your Personal Information.

This Privacy Notice supplements the **Privacy Policy** relevant to any Aviva product(s) you hold and should be read in conjunction with that document. If you don't have an Aviva product, please see the **Other Parties Privacy Policy**.

This Privacy Notice is issued on behalf of the Aviva group companies within the United Kingdom. When we refer to "**Aviva**", "**we**", "**us**" or "**our**", we mean the relevant company in the Aviva group that processes your Personal Information. Aviva Administration Limited is the main company responsible for your Personal Information (known as a "controller").

If you provide us with Personal Information about someone else, we'll assume that you have their permission, where required. We'll process Personal Information about such individuals according to this Privacy Notice so it may be helpful to show them this Privacy Notice and, if they have any concerns, please contact us using the details set out in section 7 (How to contact us) below.

#### 2. Personal Information we collect

Personal Information means any information relating to you or another living individual who is identifiable by us. The type of Personal Information we collect and use will include your name, date of birth, contact details, prior addresses, national insurance number, information about your existing pensions and your previous employment. We may also ask you to provide a photograph of you and a photograph of your identity document. Please see section 4 (Identity verification) for more information.

We collect Personal Information directly from you when you use the Find and Combine service. We also use Personal Information we already hold within the Aviva group about you and your products and we'll obtain Personal Information about you and your other pensions from the third party providers of those pensions. We may also obtain Personal Information from publicly available records and industry databases, including fraud prevention agencies and databases.

# 3. How we use your Personal Information

We'll use your Personal Information to find your pensions, check the details of those pensions, provide you with information in a pension report and communicate with you about your pensions. If you decide to transfer any pensions, we'll use your Personal Information to do this and (if applicable) to set up a Self-Invested Personal Pension for you. Our legal basis for using your Personal Information in these ways is performance of our contract with you.

We may also use your Personal Information to conduct analysis and user research, including to ensure the Find and Combine service is functioning correctly and to help us improve and develop our products and services. Our legal basis for using your Personal Information for these purposes is Aviva's legitimate interests.

For further information about what these legal bases mean, please see the **Privacy Policy** relevant to your Aviva product(s). If you don't have an Aviva product, please see the **Other Parties Privacy Policy**.

# 4. Identify verification

We may ask you to provide a photograph of you (a "selfie") and a photograph of your identity document (passport or drivers licence) to help us verify your identity. We'll use Personal Information included in those images and documents for this purpose. This includes your biometric data and, potentially, your racial or ethnic origin if it's possible to infer this from your selfie, your identity document, your surname, your place of birth or your nationality. Aviva will obtain your explicit consent to process your Personal Information in your selfie and identity document for the purpose of identity verification.

Verifying your identity will involve automated processing. You can contact Aviva for assistance if you're unable to complete your identity verification using your selfie and identity document. There's no impact on your pensions if you're unable to verify your identity, but your application for the Find and Combine service may not be able to be completed and your Aviva account access may get locked.

## 5. Who your Personal Information is shared with

We'll share your Personal Information with third party pension providers for the purposes set out in this Privacy Notice. We may also share Personal Information with Aviva group companies and other third parties, including service providers who are necessary to operate the Find and Combine service and regulatory and law enforcement bodies.

Some of the organisations we share information with may be located outside of the United Kingdom. For further information on international data transfers, please see the section on International Data Transfers in the **Privacy Policy** relevant to your Aviva product(s). If you don't have an Aviva product, please see the **Other Parties Privacy Policy**.

## 6. Your data rights

You have legal rights under data protection laws in relation to your Personal Information. For more information see the section on Data Rights in the **Privacy Policy** relevant to your Aviva product(s). If you don't have an Aviva product, please see the **Other Parties Privacy Policy**.

#### 7. How to contact us

If you have any questions about this Privacy Notice 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** 

If you'd like to submit a subject access request, please fill out this form **here** or write to us at the above address.

If you're unhappy with the way we're handling your Personal 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 (ICO): **ico.org.uk**. We ask that you please attempt to resolve any issues with us before contacting the ICO.

#### **Need this in a different format?**

Please get in touch if you'd prefer this privacy notice (**WC04591**) in large print, braille or as audio.

#### How to contact us

0800 068 6800

a contactus@aviva.com

aviva.co.uk

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