Fair Processing Notice

Data Protection – Aviva online investment service -Pension



Personal Information

We collect and use personal information about you so that we can provide you with a plan that suits your needs. This notice explains the most important aspects of how we use your information but you can get more information about the terms we use and view our full privacy policy at www.aviva.co.uk/privacy-policy/ or request a copy by writing to us at:

Aviva, Freepost, Mailing Exclusion Team, Unit 5, Wanlip Road Ind Est, Syston, Leicester, LE7 1PD

The data controller responsible for this personal information is Aviva Pension Trustees UK Limited as the provider of your plan.

Personal information we collect and how we use it

We will use your personal information:-

- To provide you with your plan: we need this to administer your plan;
- To support legitimate interests that we have as a business:
 - We need this to detect and prevent fraud
 - We also use personal information about you to help us better understand our customers and improve our customer engagement. This includes profiling and customer analytics which allows us to make certain predictions and assumptions about your interests, make correlations about our customers to improve our products and to suggest other products which may be relevant or of interest to customers, which includes marketing products and services to you
- To meet any applicable legal or regulatory obligations: we need this to meet compliance requirements with our regulators (e.g. Financial Conduct Authority), to comply with law enforcement and to manage legal claims; and
- To carry out other activities that are in the public interest: for example we may need to use personal information to carry out anti-money laundering checks.

The personal information we collect and use will include name, address, date of birth and financial information.

If we need your consent to use personal information, we will make this clear to you when you complete an application. If you give us consent to use personal information, you are free to withdraw this at any time by contacting us.

Of course, you don't have to provide us with any personal information, but if you don't provide the information we need we may not be able to proceed with your application.

Other third parties may also provide information and this can include information already held about you within the Aviva group, information we obtain from publicly available records, our trusted third parties and from industry databases, including fraud prevention agencies and databases.

How we share your personal information with others

We may share your personal information:-

- with the Aviva group, our agents and third parties who provide services to us, to help us administer our products and services;
- with regulatory bodies and law enforcement bodies, including the police, e.g. if we are required to do so to comply with a relevant legal or regulatory obligation;
- with other organisations including insurers, public bodies and the police (either directly or using shared databases) for fraud prevention and detection purposes;

Some of the organisations we share information with may be located outside of the European Economic Area ("EEA"). We'll always take steps to ensure that any transfer of information outside of Europe is carefully managed to protect your privacy rights. For more information on this please see our Privacy Policy or contact us.

Marketing

We also use personal information we hold about you across the Aviva Group to help us identify and tailor products and services that may be of interest to you. We will only communicate with you in accordance with any marketing preferences you have provided to us. We will continue to do this after your policy has ended.

If you wish to amend your marketing preferences, change how you would like us to communicate with you, or tell us to stop marketing to you, you can do so in the following ways:

Update your preferences in MyAviva

By phone: 01603 622200

By email: contactus@aviva.co.uk

By Post: Aviva, Freepost, Unit 5, Wanlip Road Ind Est, Syston, Leicester, LE7 1PD

To see how you can change your preferences in MyAviva or view your choices for online advertising visit our full Privacy Policy at www.aviva.co.uk/privacy-policy/

How long we keep your personal information for

We maintain a retention policy to ensure we only keep personal information for as long as we reasonably need it for the purposes explained in this notice. We need to keep information for the period necessary to administer your plan and deal with queries on your plan. We may also need to keep information after our relationship with you has ended, for example to ensure we have an accurate record in the event of any complaints or challenges, carry out relevant fraud checks, or where we are required to do so for legal, regulatory or tax purposes. We will also use this information for marketing purposes.

Your rights

You have various rights in relation to your personal information, including

- the right to request access to your personal information,
- to correct any mistakes on our records,
- to erase or restrict records where they are no longer required,
- to object to use of personal information where this use is based on our legitimate business interests, including for profiling and marketing, and
- data portability.

For more details in relation to your rights, including how to exercise them, please see our full privacy policy or contact us.

Contacting us

If you have any questions about how we use personal information, or if you want to exercise your rights stated above, please contact our Data Protection Officer by writing to them at Level 4, Pitheavlis, Perth, PH2 0NH.

If you have a complaint or concern about how we use your personal information, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have the right to lodge a complaint with the Information Commissioner's Office at any time.

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