

Fair Processing Notice – Pension Consolidation Service

Privacy Notice

Aviva Administration Limited is the main company responsible for your Personal Information (known as the Controller).

FF Fabric Limited (“Fabric”) are our data processor in relation to this Service, you can find out more about our relationship with Fabric below.

We collect and use Personal Information about you in relation to our Pension Consolidation Service. 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 and your national insurance number. Where we need to obtain information from your existing pension schemes to assess whether they are suitable for consolidation, occasionally those providers may provide us with more sensitive information (e.g. details of your health) which may be contained in their records.

Some of the Personal Information we use may be provided to us by a third party. This may include information already held about you within the Aviva group, information we obtain from publicly available records, third parties and from industry databases, including fraud prevention agencies and databases.

This notice explains the most important aspects of how we use your Personal Information, but you can get more information by viewing our full privacy policy at aviva.co.uk/privacypolicy or requesting a copy by writing to us at: The Data Protection Team, Aviva, PO Box 7684, Pitheavlis, Perth PH2 1JR. If you are providing Personal Information about another person you should show them this notice.

We rely on performance of a contract as the legal basis upon which we process your personal data as part of the Service. If we are provided with sensitive information, such as details of your health status or details of beneficiaries or dependents, we will process for the purposes of delivering or assessing an occupational pensions scheme, as we are processing the data to decide as to whether your pension can be consolidated and if so, on what terms. We will use the information provided by you to contact your pensions Scheme Administrator(s) to obtain information relating to you and your pension(s).

When you sign up to our Terms of Use, we will request from you an electronic signature as part of your application. Your signature will be used within the required letter of authority and information request, which we will send to the providers you specified in your application, with whom you hold a pension. We are accepting your electronic signature as your formal authorisation to do so and it will be held as a digital record of this approval. If the provider requires further proof of your authority, they may ask us to obtain proof of your further permission, if we need this, we will reach out to you. Depending on the providers requirements, your electronic signature may also be used within physical transfer request documents, in such situations we will confirm that we are using your signature for these purposes prior to doing so.

When the pension information is received, this will then be checked to see if you would lose any safeguarded or valuable benefits by transferring the pension. The results of these checks will be provided to you in an email and pension report and provide guidance on the next steps to take.

We use Fabric to administer some parts of the Service. This means that Fabric will 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.

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.

We also use profiling and other data analysis to understand our customers better, e.g. what kind of content or products would be of most interest, and to predict the likelihood of certain events arising, e.g. to assess risk or the likelihood of fraud.

We may use Personal Information we hold about you across the Aviva group for marketing purposes, including sending marketing communications in accordance with your preferences. If you wish to amend your marketing preferences please contact us at: **contactus@aviva.com** or by writing to us at: Aviva, Freepost, Mailing Exclusion Team, Unit 5, Wanlip Road Ind Est, Syston, Leicester, LE7 1PD. More information about this can be found in the “Marketing” section of our full privacy policy.

Your Personal Information may be shared with other Aviva group companies and third parties (including service providers and regulatory and law enforcement bodies). We may transfer your Personal Information to countries outside of the UK but will always ensure appropriate safeguards are in place when doing so.

You have certain data rights in relation to your Personal Information, including a right to access Personal Information, a right to correct inaccurate Personal Information and a right to erase or suspend our use of your Personal Information. These rights may also include a right to transfer your Personal Information to another organisation, a right to object to our use of your Personal Information, a right to withdraw consent and a right to complain to the data protection regulator. These rights may only apply in certain circumstances and are subject to certain exemptions. You can find out more about these rights in the “Data Rights” section of our full privacy policy or by contacting us at **dataprt@aviva.com**.

