

AMT Privacy Notice

Aviva Master Trust Board

for the AVIVA MASTER TRUST (the “**Scheme**”)

This notice is for members and beneficiaries of the Scheme. It has been prepared by the Trustee of the Scheme (“**Trustee**”, or “**we**”) in their capacity as Trustee of the Scheme.

This privacy notice will also be made available online

<https://workplace.aviva.co.uk/amt-fpn/>.

A summary of this privacy notice will also be in the Member Guide of the Scheme. The Trustee of the Scheme is the main Company responsible for your personal data (known as the Controller).

The Trustee have appointed Aviva as administrator of the Scheme. In this capacity, Aviva are a data processor and use your personal data in accordance with a written agreement with the Trustee. This agreement requires Aviva to use your personal data only in accordance with the instructions of the Trustee, to preserve the confidentiality of the data and to keep your personal data secure.

Aviva are also the sponsor of the Scheme and provide the investment product and investment platforms which hold your personal data. For the investment product and investment platforms Aviva are a data controller.

The Trustee and Aviva work together to improve member outcomes by providing pension features and services and information and education through different channels including;

- workplace-based materials;
- online videos;
- webinars and face-to-face workshops; and

- access to useful online tools including a Retirement Forecaster, to project whether members are on track with their retirement plans provided through their MyAviva account.

Aviva are directly responsible to you for their use of your personal data in this capacity and use your personal data in accordance with their data privacy policy.

For more information on how Aviva use your personal data in relation to data analytics, their Retirement data privacy notice is available online:

<https://www.aviva.co.uk/services/about-our-business/products-and-services/privacy-policy/>.

Why we are providing this privacy notice to you

As the Trustee of the Scheme we hold certain information about you (“**personal data**”). We are required by law to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This privacy notice is designed to give you that information.

Why we hold your personal data

The Trustee is committed to collecting and using personal data in accordance with applicable data protection laws. By law, we must have a legal justification, known as a lawful basis, in order to use your personal data for the purposes described in this Privacy Notice. Depending upon the purpose, our lawful basis will be one of the following:

- Performance of a contract – to provide you with access to the Scheme in accordance with our terms including admitting new members: calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustee have in relation to the Scheme;

- Compliance with a legal obligation – to satisfy our legal obligations as Trustee of the Scheme, to meet responsibilities we have to our regulators, tax officials, law enforcement, or other legal responsibilities;
- Legitimate interests – to operate and improve the Scheme and keep members informed about the scheme or for any other purposes we identify as appropriate to meet our responsibilities as Trustees or to meet those business needs of a third party;
- Consent – where we have obtained appropriate consents to collect or use your Personal Information for a particular purpose.

Where we rely on legitimate interests as our lawful basis, we are required to carry out a balancing test to ensure that our interests, or those of a third party, do not override the rights and freedoms that you have as an individual. The outcome of this balancing test will determine whether we can use your personal data for the purposes described in this Privacy Notice.

What personal data we hold and how we obtain it

The types of personal data we hold and manage about you can include:

1. Contact details, including name, address, telephone numbers and email address;
2. Identifying details, including date of birth, national insurance number and membership or policy numbers;
3. Financial information relevant to the calculation or payment of benefits, for example salary, contribution history and employment, bank account and tax details;
4. Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death;
5. Information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Scheme;

6. Information about a criminal conviction if this has resulted in you owing money to your employer or the Scheme and the employer or Scheme may be reimbursed from your benefits;
7. Information about your spouse should a pension sharing order on divorce be issued by the Court.

We may obtain some of this personal data directly from you. We may also obtain personal data from your employer, from another pension scheme (where other pension benefits are being transferred into the Scheme), from an adviser on behalf of your employer or another pension scheme, from a registered medical practitioner (where it is needed to assess eligibility for benefits), from a member of the Scheme (where you are or could be a beneficiary of the Scheme as a consequence of that person's membership), and from a variety of other sources including public databases, our advisers, and government or regulatory bodies.

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories where we can lawfully process this data for one of the reasons permitted by that legislation. These reasons are that you give your explicit consent; or the processing is necessary for carrying out our obligations or exercising our rights in relation to the Scheme; or to assist you in exercising your rights or performing your obligations in relation to the Scheme; or that it is necessary in connection with establishing, exercising or defending legal claims. If you choose to give your consent, you have the right to withdraw it at any time by notifying the Trustee in writing. However, if you do withdraw it, and the Trustee is not able to rely on one of the other lawful reasons mentioned above, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained within this privacy notice.

How we will use your personal data

We may use your personal data to deal with all matters relating to the Scheme, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

1. to contact you;
2. to assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits;
3. to identify your potential benefit options and, where relevant, implement those options;
4. to allow alternative ways of delivering your benefits;
5. to manage member funds and to ensure monies are recorded, invested and disinvested accordingly;
6. to comply with our legal and regulatory obligations as Trustee of the Scheme including those relating to the Pensions Dashboard;
7. to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Scheme;
8. to facilitate the management of the Scheme, including the entering into of insurance arrangements and selection of Scheme investments;
9. in connection with the sale, merger or corporate reorganisation of the employers that participate in the Scheme and their group companies; and
10. to share with the employer and other third parties.

Organisations that we may share your personal data with

From time to time we will share your personal data with our advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Scheme. We require all advisers and service providers to respect the security of your data and to treat it in accordance with the law.

The Trustee have also appointed a number of other professional advisers with whom they may share your personal data. For an up to date list of the Trustee's professional

advisers and details of their privacy notices please contact Aviva using the contact details below.

In some instances, advisers and service providers will be data controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data.

We may also provide some of your personal data to your employer, their advisers (including where your employer has arranged for you to have access to an independent financial adviser) and potential purchasers of their businesses.

In addition, we may provide some of your personal data to the trustee and/or administrators of another pension scheme you are a member of (where you or your employer are considering transferring your Scheme benefits to that pension scheme) and to any other third party reasonably required where we consider there is a legitimate interest or legal obligation such as the Pensions Dashboard.

The advisers, service providers and organisations referred to in the paragraphs above may also use personal data to perform their functions for planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, the administrator may pass the data to their administration platform software providers or other IT providers) to the extent they consider the information is reasonably required for a legitimate purpose.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman and HMRC. They may then use the data to carry out their legal functions.

In some cases, recipients of your personal data may be outside the UK. This means your personal data may be transferred outside the UK to a jurisdiction that may not offer an equivalent level of protection as is required by UK data protection laws. If this occurs, appropriate safeguards must be implemented with a view to protecting your

data in accordance with applicable laws. Please use the Aviva contact details below if you want information about the safeguards that are currently in place.

How long we keep your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme and for so long afterwards as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Scheme. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

Your rights

You have a right to access and obtain a copy of the personal data that the Trustee hold about you and to ask the Trustee to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask the Trustee to erase or restrict the processing of your personal data, to object to processing or to transfer your personal data.

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Trustee using the contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustee processing activities with the Information Commissioner's Office.

The personal data we hold about you is used to administer your Scheme benefits, and we may from time to time ask for further information from you for this purpose. If you do not provide such information or ask that the personal data we already hold is deleted or restricted, this may affect the payment of benefits from the Scheme. In some cases, it could mean the Trustee are unable to pay your pension savings in accordance with the processing of your personal data.

Contacting us

Members with a policy number starting with GS

Telephone:

0345 604 9915

Website:

www.avivamymoney.co.uk

Email:

mymoney@aviva.com

Write:

Aviva, PO Box 2282,
Salisbury, SP2 2HY

Please contact Aviva using the contact details below. Aviva will contact the Trustee for further information when a request is received.

Members with a policy number starting with F**Telephone:**

0800 068 1431

Website:

www.aviva.co.uk/membersite

Email:

ngp.questions@aviva.com

Write:

Aviva, PO Box 1550,
Salisbury, SP1 2TW

