



For adviser and trustee use only.

Bulk Purchase Annuity Data Privacy Notice

Retirement
Investments
Insurance
Health

Personal Information

This privacy notice explains how Aviva handles member information in their capacity as provider of the bulk purchase annuity product used by the trustee of the pension scheme. For further information about how the trustee of the pension scheme handle member information please refer to their separate privacy notices.

Aviva collect and use personal information so that we can provide an insurance product to the trustees of the pension scheme. This notice explains the most important aspects of how we use member information but you can get more information about the terms we use and view our full privacy policy at www.aviva.co.uk/privacypolicy 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 Life & Pensions UK Limited as the insurer of the product provided to the trustees of the pension scheme

Personal information we collect and how we use it

Aviva will use personal information:

- To support legitimate interests that we have as a business. We need this to set up and administer the policy for the trustees of the pension scheme and to detect and prevent fraud.
- 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.
- To carry out other activities in the public interest. For example we may need to use personal information to carry out anti-money laundering checks.

The personal information we use will include name, address, date of birth and financial information of both the member and any dependant. Where we are provided with a dependants' details, they should also be provided with a copy of the relevant privacy notice. A member does not have to agree that we can hold their personal information but if they don't we may not be able to proceed with administering benefits under the policy.

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

How Aviva may share member information with others

We may share member information:

- With the Aviva group, our agents and third parties who provide services to us to help us administer our products and services;
- With, the trustee of the pension scheme and third parties that are providing services to both you and them in respect of the administration, governance and evaluation of the pension scheme;
- 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; and
- With reinsurers who provide reinsurance services to Aviva and for each other. Reinsurers will use member information to deal with reinsurance claims and to meet legal obligations. They will keep your data for the period necessary for these purposes and may need to disclose it to other companies within their group, their agents and third party service providers, law enforcement and regulatory bodies.

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.

How long Aviva will keep member information

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 the product and deal with queries on the policy. We may also need to keep information after our relationship with a member or the trustees 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.

Member rights

Scheme members have various rights in relation to their personal information, including the right to:

- request access to their personal information,
- correct any mistakes on our records,
- erase or restrict records where they are no longer required,
- object to use of personal information (where this use is based on our legitimate business interests),
- ask not to be subject to automated decision making (if the decision produces legal or other significant effects), and
- data portability.

For more details about the rights of members, including how to exercise them where Aviva is the Data Controller, please see Aviva's full privacy policy or contact us. For more information on how a member can exercise their rights in respect of data processed by the trustee of the pension scheme, please contact the trustee.

Contacting us

If you have any questions about how Aviva use personal information, or if a member wants to exercise any rights stated above, please contact Aviva's Data Protection Officer by writing to them at:

**Data Protection Officer,
Aviva,
Level 4,
Pitheavlis,
Perth,
PH2 0NH**

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

December 2019

Braille, large text, audio material

You can order our literature in Braille, large font or audio.

Just call **08000 686 800** or email **helpdesk@aviva.co.uk** and tell us:

- the format you want
- your name and address
- the name or code of the document. The code is usually in the bottom left hand corner on the back of most documents.

The Customer Call Centre is open Monday to Friday, 8 am to 8 pm, and Saturday from 8.30am to 5pm.



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Authorised and regulated by the Financial Conduct Authority.
Firm Reference Number 145452.

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