

Chapter 11

Specific requirements where
firms offer data export



11.4 Restrictions on providing data export to the customer

Specific disclosures prior to the provision of data export to the customer

- 11.4.1 **R** In good time before the *customer* elects to receive *data export*, a *firm* must provide the *customer* with appropriate information to help the *customer* make an informed choice as to whether or not to agree to *data export*. This information must include:
- (1) the name of the *person* who is the data controller;
 - (2) the nature of the processing which will take place to export the data; and
 - (3) the purpose for which the data will be processed.
- 11.4.2 **R** Before the *customer* agrees to *data export*, a *firm* must clearly and prominently display a warning to the *customer* about the risks of *data export* to the *customer*, including that:
- (1) their data is valuable;
 - (2) it is important that they keep their data safe; and
 - (3) if the *data export* is being facilitated by download, the *customer* should avoid downloading the data on a shared device.

Restrictions on the content, format and manner of data export to the customer

- R** A *firm* must ensure that *pensions dashboard view data* exported to a *customer* is in a format which is accessible to a member of the general population.
- 11.4.4 **G** A *firm* should consider whether the format of *data export* engages any accessibility obligations, such as under the Equality Act 2010.
- 11.4.5 **R** The information exported by *data export* to the *customer* must include:
- (1) subject to **■** PDCOB 11.3.4R, the *customer's pensions dashboard view data*; and

- (2) any display explanations and contextual information which is required by ■ PDCOB 5 and other legislation, such as the *Dashboard Regulations*.

Specific disclosures when providing information by data export to the customer

11.4.6

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The information provided by *data export* to the *customer* must be prominently accompanied by:

- (1) the warning at ■ PDCOB 5.5.1R(1);
- (2) a signpost to the ScamSmart campaign - such as a link to ScamSmart - Avoid investment and pension scams | FCA;
- (3) a message that the *customer's pensions dashboard view data* is sensitive and valuable, and the *customer* should seek to keep their data safe;
- (4) a message that, if the *customer* is asked to share their data with a third party, the *customer* should think carefully about whether a third party needs to see the data, check whether the third party is who they say they are and, if they claim to be authorised or exempt, should use the *Financial Services Register* to check; and
- (5) signposts to impartial guidance available from MoneyHelper.