

NMB-MINEBEA UK PENSION SCHEME

Data Protection Complaints Policy

1. PURPOSE

- 1.1 The Trustee of the NMB-Minebea UK Pension Scheme is committed to handling personal data fairly, lawfully, transparently and securely.
 - 1.2 This Policy sets out how individuals can raise a complaint about how the Trustee or its service providers acting on its behalf have handled personal data, and how such complaints will be managed.
 - 1.3 This Policy is intended to ensure compliance with the Trustee's obligation to maintain and operate a complaints process under section 164A into the Data Protection Act 2018 (as inserted by the Data (Use and Access) Act 2025).
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2. SCOPE

- 2.1 This Policy applies to:
 - Scheme members (deferred and pensioner members);
 - survivors, dependants and beneficiaries of Scheme members; and
 - any other individual whose personal data the Trustee processes.
- 2.2 This Policy covers complaints about the Trustee's compliance with UK data protection law in relation to the complainant's personal data, including:
 - suspected misuse or unauthorised disclosure of personal data;
 - concerns about the security of personal data (including breaches);
 - concerns about the accuracy of data, data retention, transparency or fairness;
 - dissatisfaction with how the Trustee handled a data subject's rights request (e.g. access, rectification, erasure or restriction).
- 2.3 This Policy does not replace the Scheme's IDRP for:
 - benefit-related disputes etc.; or
 - general service complaints (e.g. maladministration) that do not relate to compliance with data protection law.

Where a complaint contains both data protection and non-data protection elements, the Trustee will manage the data protection element under this Policy and may manage the remainder under the IDRP.

3. DEFINITIONS

Administrator means the scheme's administrators, Lane Clark & Peacock LLP.

Data protection complaint means an expression of dissatisfaction about how the Trustee has handled the complainant's personal data, where the complainant believes their data protection rights may have been infringed.

ICO means the Information Commissioner's Office.

IDRP means the Scheme's internal dispute resolution procedure under section 50 of the Pensions Act 1995.

Scheme means the NMB-Minebea UK Pension Scheme.

Trustee means the trustee or trustees of the Scheme.

Trustee Lead means the individual appointed by the Trustee to act as its principal point of contact for the Scheme.

4. PRINCIPLES

4.1 The Trustee will operate a complaints process that is:

- transparent and accessible (easy to find and use); and
- effective in practice, including acknowledging complaints within required timescales and progressing them without undue delay.

4.2 The Trustee will:

- treat complainants fairly and without discrimination;
- ensure appropriate confidentiality;
- keep appropriate records of complaints and outcomes; and
- use complaints to improve data protection governance and controls (where appropriate).

5. HOW TO MAKE A DATA PROTECTION COMPLAINT

5.1 A complaint may be made by the complainant or an authorised representative (e.g. a solicitor). The Trustee may request evidence of authority where appropriate.

5.2 The Trustee has appointed the Administrator as the primary point of contact for receiving data protection complaints.

5.3 Complaints should be submitted using the following contact details:

- **Email:** NMBAdmin@lcp.uk.com
- **Post:** NMB-Minebea UK Pension Scheme
St Paul's House
St Paul's Hill
Winchester
Hampshire
SO22 5AB

5.4 Any complaint received by the Trustee directly will be forwarded to the Administrator for logging and initial handling, subject to Trustee oversight.

5.5 The Trustee will treat any expression of dissatisfaction about data handling as a complaint, regardless of how it is submitted.

6. RECEIPT, ACKNOWLEDGEMENT AND INITIAL ASSESSMENT

6.1 Logging

All complaints received will be:

- logged promptly in a complaints register maintained on behalf of the Trustee; and
- notified to the Trustee Lead.

6.2 Acknowledgement within 30 days

The Trustee (or the Administrator on behalf of the Trustee) will **acknowledge receipt within 30 days** of receiving a complaint.

6.3 Initial assessment

The Administrator, in conjunction with the Trustee, will carry out an initial assessment and:

- confirm the scope of the complaint; and
- identify any urgency (e.g. a potential breach).

7. INVESTIGATION AND RESPONSE

7.1 Roles and responsibilities

- The Administrator will undertake the day-to-day investigation and coordination.
- The Trustee shall retain overall responsibility as data controller and will:
 - oversee the investigation where appropriate;
 - be involved in complex, high-risk or sensitive complaints; and
 - approve substantive responses where required.

7.2 Investigation steps

The Administrator will take appropriate steps **without undue delay**, which may include:

- making enquiries into the subject matter of the complaint;
- reviewing relevant records, correspondence, system logs and access controls;
- liaising with the Trustee and the Scheme's other processors/service providers as appropriate;
- obtaining legal advice where necessary; and
- implementing interim measures to reduce risk (where appropriate).

7.2 Keeping the complainant informed

The Trustee/Administrator will keep the complainant informed of progress where it is reasonable to do so, particularly if the complaint is complex or requires input from third parties.

7.3 Outcome without undue delay

Once the investigation is complete, the Trustee/Administrator will communicate the outcome to the complainant **without undue delay**.

For:

- high-risk complaints;
- complaints involving potential regulatory exposure; or
- systemic issues,

the response will be reviewed and/or approved in accordance with the Trustee's governance processes before being issued.

7.4 Possible outcomes

Outcomes may include:

- explanation of the findings of the investigation and the Trustee's position;
 - confirmation of any remedial steps taken or planned (e.g. corrected records, revised retention policies, staff guidance);
 - signposting to the complainant's right to escalate to the ICO if dissatisfied.
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8. INTERACTION WITH DATA SUBJECT RIGHTS REQUESTS

8.1 If the complaint includes (or triggers) a data subject rights request (e.g. subject access, rectification), the Trustee will:

- manage the complaint under this Policy; and
- manage the rights request under the Scheme's Data Protection Policy, ensuring statutory timescales are met.

8.2 Where the complaint arises from the handling of a rights request, the Trustee will consider whether any lessons learned require updates to procedures or training.

9. ESCALATION AND ICO SIGNPOSTING

9.1 The Administrator will escalate complaints to the Trustee where:

- the issue is complex or high-risk;
- a data breach is suspected; or
- legal interpretation is required.

9.2 If the complainant remains dissatisfied, they may contact the ICO. The Trustee (via the Administrator) will provide appropriate signposting.

10. COMPLAINTS INVOLVING SERVICE PROVIDERS

10.1 The Trustee may rely on the Administrator and other service providers to investigate complaints concerning their own processing activities.

10.2 The Trustee will ensure appropriate cooperation through contractual arrangements and information sharing.

11. DATA BREACHES AND URGENCY

11.1 If the complaint suggests a personal data breach, the Trustee Lead will immediately assess, in conjunction with the Administrator and the Scheme's professional advisers as appropriate, whether the Scheme's breach response plan should be invoked.

11.2 The Trustee will consider notification obligations (to the ICO and/or affected individuals) in line with the Trustee's incident response procedures and relevant legal requirements.

12. CONFIDENTIALITY

- 12.1 The Trustee will handle complaints confidentially and share information only on a need-to-know basis (e.g. with the Administrator, advisers, or regulators).
- 12.2 The Trustee may redact third-party data where appropriate.
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13. RECORD-KEEPING AND AUDIT TRAIL

- 13.1 The Trustee will maintain records of:
- complaints received;
 - acknowledgements;
 - investigation steps and evidence reviewed;
 - communications with complainants; and
 - outcomes and remediation actions.
- 13.2 Records will be retained in accordance with the Scheme's retention policy and only for as long as necessary.
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14. POLICY REVIEW

The Trustee shall review this Policy at least once every three years and after any material complaint, breach, legislative change or regulatory update.

Trustee of the NMB-Minebea UK Pension Scheme

Version dated: May 2026