

Data Protection Complaints Procedure

Scheme name (the "Scheme"):
Effective date:

Senior plc Pension Plan
19 June 2026

Version history:

v01 19 June 2026

Other documents referenced:

Introduction, glossary and roles

Purpose

This Data Protection Complaints Procedure outlines the procedures and processes to investigate and decide upon complaints quickly and effectively.

Complaints about any aspect of the Scheme are rare and are normally resolved quickly and informally. In the first instance therefore, if you do have a data protection concern, please contact the Scheme's Administrators, who may be able to resolve it.

In the exceptional circumstances where they cannot be resolved by this approach, the Trustee has put in place a formal procedure for the resolution of complaints, as required by the Data Use and Access Act. The Information Commissioner expects you to have gone through this complaints process before escalating a data protection complaint to them.

If your complaint relates to issues regarding your pension benefits (e.g. how your benefits have been calculated or paid) or about the administration of the Scheme more generally, you should use the internal dispute resolution procedure (IDRP). If you are not sure which process to follow, please contact the Scheme Administrator who will be able to assist.

Who may make a complaint?

Anyone who falls into, or claims to fall into, the following groups and considers that data protection legislation has been breached due to the way your personal data has been handled:

- Scheme members
- Spouses, civil partners, and dependants of members who have died
- Non-dependent beneficiaries of members who have died
- Prospective members
- Anyone who has been a member or prospective member in the previous six months
- Anyone who feels they have a legitimate complaint.

If you wish, you may nominate someone else to act on your behalf as your representative when following the process.

This document should be read alongside the Introduction, glossary and roles document for any definitions or references of firms or individuals who provide services to the Scheme.

This document will be reviewed regularly to ensure it remains accurate, or when updates are required. The document is effective from the date above and replaces previous versions of the document.

Making a complaint

If you have a data protection complaint, please complete the complaints Complaint Form, which is attached. The form should then be sent to the contact whose details are on the form.

When can I expect to receive a response?

On receipt of the Complaint Form, you will be sent an acknowledgment within 30 days. If you do not receive an acknowledgement within this timeframe, please reach out to the contact on the form to confirm receipt.

The Trustee will then investigate the complaint and may contact you again to obtain further information before making a decision.

We will inform you of the outcome of our investigation as soon as we are able but we cannot give a specific timeframe, as some complaints may take longer than others to investigate. Where an investigation is taking more time, we will provide you with updates about its progress.

Further information

The Information Commissioner

You have the right to refer your complaint to the Information Commissioner free of charge if you are unhappy with the outcome of your complaint.

The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

You can also submit a complaint form online: <https://ico.org.uk/make-a-complaint/>

Queries

If you have any queries regarding this procedure, please contact the Trustee using the details provided on the forms.