

The Taylor Wimpey Pension Scheme (the "Scheme") Internal Data Protection Complaints Procedure

1. INTRODUCTION

- 1.1 Taylor Wimpey Pension Trustees Limited (the "**Trustee**"), as trustee of the Taylor Wimpey Pension Scheme (the "**Scheme**"), must facilitate the making of data protection complaints by you, if you believe the Trustee has breached the UK General Data Protection Regulation (the "**UK GDPR**") when it is acting as a data controller. You can complain to the Trustee on your own behalf (about how it has handled your personal data), or on behalf of a third party, if you have authority to do so.
- 1.2 You should use the contact details of the Secretary to the Trustee below to make a data protection complaint. However, you are still entitled to complain to the Trustee in any way that you choose, and the Trustee is still required to accept the complaint.
- 1.3 Contact details for the Secretary to the Trustee are as follows:
 - (a) Secretary to the Trustee, Taylor Wimpey Pensions, Unit 2 Tournament Court, Edgehill Drive, Warwick CV34 6LG
 - (b) pensions@taylorwimpey.com
- 1.4 In situations where it is not clear if someone is making a data protection complaint, the Trustee will ask for clarification.
- 1.5 When the Trustee responds to your request to exercise your rights under the UK GDPR, it will make you aware in its response that you can make data protection complaints to the Trustee.

2. IDENTIFYING DATA PROTECTION COMPLAINTS AND OVERLAP WITH IDR

- 2.1 You can bring a data protection complaint against the Trustee if you consider that it has infringed data protection legislation because of the way it has handled your personal information.
- 2.2 A complaint about service or other matters while also exercising data protection rights does not count as a data protection complaint. For example, it is not a data protection complaint if you raise a complaint about the distribution of death benefits and request copies of your personal information as part of that process (i.e. exercising your right to access, without making a complaint about how your data has been handled).
- 2.3 A data protection complaint may overlap with a more general complaint under the Scheme's internal dispute resolution procedure ("**IDRP**"). For example, if a member who is going through a divorce makes a complaint about incorrect data being shared with their ex-spouse and used to implement a pension sharing order, the incorrect data sharing is a data protection complaint, but the complaint about the resulting level of their benefits falls within the IDR.
- 2.4 Where a complaint contains elements of both a general IDR complaint and a data protection complaint, the Trustee must respond to the data protection component separately if it can be resolved first, rather than waiting to respond to the entire complaint at once.

3. RESPONSIBILITY FOR COMPLIANCE

- 3.1 Responsibility for compliance with this procedure and for the handling of data protection complaints rests with the Trustee. Where the Scheme Administrator (or another third party / contact) receives a data protection complaint that relates to the processing of personal data in circumstances where the Trustee is the controller, it will send the complaint to the Trustee

immediately. The Trustee may engage third parties to assist it with investigating and administering the data protection complaint.

- 3.2 The Trustee has appointed the Secretary to the Trustee to oversee data protection complaints. Once the Secretary to the Trustee has investigated a data protection complaint, it shall be referred to the Trustee to decide how to respond to the complaint.

4. IDENTITY VERIFICATION

- 4.1 If your identity is unclear at the point you submit a data protection complaint, the Trustee will request proof of ID before responding, and at the earliest opportunity. It will do so by asking for a copy of your passport, driving licence or other Trustee-approved identity documents. However, it will not ask for further information if it already has the information it needs to be satisfied about your identity.
- 4.2 There may be occasions where you want to make a data protection complaint on behalf of someone else. Where this is the case, the Trustee will check that you have authority to act on behalf of the other person. The form of that authority should be:
- (a) an appropriate power of attorney; or
 - (b) a signed letter of authority from the person that you are acting for.
- 4.3 If the Trustee has any concerns about the validity of the documents specified in 4.2 above, then it may decide to contact the individual who is the source of the complaint to check whether they provided you with authority.
- 4.4 If you claim to have authorisation to make a data protection complaint on behalf of someone else but the Trustee has no evidence of this authority, then it will not investigate the data protection complaint.
- 4.5 The Trustee is able to receive data protection complaints from children, if they are a beneficiary or potential beneficiary of the Scheme. The Trustee will assess whether the child is competent to understand and exercise their rights.

5. ACKNOWLEDGING THE DATA PROTECTION COMPLAINT

- 5.1 The Trustee must acknowledge a data protection complaint within 30 days. The 30-day period commences on the day after the complaint is received, regardless of whether this is a weekend or public holiday. However, if the last day to acknowledge the data protection complaint falls on a weekend or public holiday, then the Trustee has until the next working day to send the acknowledgement.
- 5.2 If the Trustee is able to investigate and respond to the data protection complaint within the 30-day period, it does not need to give a separate acknowledgement of the complaint.
- 5.3 If the Trustee needs to write to you to ask for ID (see 4 above), then it does not need to write separately to acknowledge the complaint, once the ID is verified.

6. INVESTIGATING THE DATA PROTECTION COMPLAINT

Step 1: gather information

- 6.1 **The Trustee shall commence its investigation into a data protection complaint by gathering as much relevant information as possible.** This includes:
- (a) considering the facts thoroughly, fairly and accurately;
 - (b) speaking to relevant people;
 - (c) comparing information you have provided when making the data protection complaint with the information that it holds internally; and

(d) checking if it has complied with its own policies, procedures and standards (as relevant).

6.2 If it is unclear what the data protection complaint is about, the Trustee will request more information from you as soon as possible.

6.3 To help the Trustee to resolve the complaint more quickly, it may ask about the outcome that you are expecting from your data protection complaint, e.g. to change a decision it has made, apologise for a mistake, or change its processes.

Step 2: Investigate / make enquiries

6.4 **The Trustee must take appropriate steps to respond to the data protection complaint, without undue delay.** This obligation commences as soon as it receives the complaint, and not from the time that it is acknowledged.

6.5 'Without undue delay' means without an unjustifiable or excessive delay and will be judged on a case-by-case basis. In practice, the time for investigation depends on factors like:

- (a) how complex the issue is;
- (b) the scale of the issue (e.g. if it is a complaint about a single isolated event, or if it relates to a number of matters occurring over a period of time); and
- (c) any harm being suffered by you.

6.6 **The Trustee must conduct appropriate enquiries into the data protection complaint, considering the circumstances and ensuring that it can justify its approach.** However, the Trustee is not required to take steps that would be unreasonable or disproportionate on the facts.

Step 3: Keeping you informed of progress

6.7 **The Trustee must keep you updated on the progress of its investigations without undue delay.** For example, if it knows that the investigation is likely to take some time it must contact you and let you know that it is working on its response.

Step 4: Provide an outcome

6.8 **The Trustee must let you know the outcome of your data protection complaint without undue delay.**

6.9 It will clearly explain:

- (a) what it has done to resolve the data protection complaint;
- (b) how it has reached the outcome;
- (c) the actions that it has taken; and
- (d) Details of the ICO.

6.10 If the Trustee's position is that it has complied with the UK GDPR, it will explain this in detail.

6.11 If you are not satisfied with the response to your complaint provided by the Secretary to the Trustee, you can appeal to the Trustee or, at your option, you can refer your complaint to the ICO.

Step 5: Review

6.12 Once the outcome of the data protection complaint has been communicated to you, the Trustee will review the matter, as appropriate, and implement any identified improvements that it considers are necessary to help it to prevent future data protection complaints.

7. RECORD KEEPING

- 7.1 The Trustee keeps appropriate records in relation to data protection complaints, as the UK data protection regulator may ask to see these records and/or may ask about the number of complaints that it has received.
- 7.2 In particular, it will keep a record of:
- (a) the date it received the data protection complaint;
 - (b) the date and content of the acknowledgement;
 - (c) any relevant considerations and documentation;
 - (d) the date and content of the reply to you, explaining the outcome of the data protection complaint; and
 - (e) any actions it took following its investigations into the data protection complaint.
- 7.3 The Trustee will not keep personal data in relation to data protection complaints for longer than it needs it.

8. REVIEW

- 8.1 The Trustee shall carry out a regular review of this Policy and reserves the right to amend this Policy from time to time.

Version	Date revised	Description of change	Reviewed by
1.	08.06.2026	Adopted	Trustee Board