

Purpose of this procedure

This procedure explains how Pearson Pension Trustee Limited (the '**Trustee**') of the Pearson Pension Plan (the '**Plan**') will handle complaints that the Trustee has infringed the UK General Data Protection Regulation (the '**UK GDPR**'). This procedure is intended to facilitate the handling of such complaints in compliance with section 164A of the Data Protection Act 2018.

It applies from 19 June 2026 and is separate from the Plan's Internal Dispute Resolution Procedure (the '**IDRP**').

What is a data protection complaint?

A data protection complaint is any concern or dissatisfaction about how the Trustee handles personal data, including (for example):

- how personal data is collected, used, shared or retained
- the accuracy of personal data
- how a subject access request ('**SAR**') has been handled
- data security or confidentiality issues.

A complaint may be made by any living individual whose personal data is processed by the Trustee, including Plan members, beneficiaries, and former members. This procedure does not apply to deceased individuals as their personal data is not subject to the UK GDPR.

How to make a data protection complaint

A data protection complaint can be submitted:

- by completing the Data Protection complaint form available on this website; or
- by writing to: The Secretary to the Trustee, Pearson Pension Trustee Limited, PO Box 645, Darlington, DL1 9HP; or
- by emailing pensions.helpline@pearsonpensions.com; or
- by calling 0800 7811378 (+44 203 7888562 if calling from outside the UK).

There is no formal requirement that a complaint be submitted using the Data Protection complaint form or that it be in writing. However, complainants are encouraged to use the Data Protection complaint form wherever possible to ensure their complaint is accurately recorded and the Trustee has sufficient information to verify the complainant's identity and address the complaint.

Acknowledgement of complaints

The Trustee or the Plan administrator (as applicable) will acknowledge receipt of a data protection complaint within 30 days of receiving it.

Where a data protection complaint is received by the Plan administrator rather than the Trustee directly, the administrator must promptly forward the complaint to the Trustee. The Trustee has authorised the administrator to acknowledge receipt of the complaint on its behalf.

Verification of identity

The Trustee must verify the identity of the complainant before responding substantively to the complaint. This should be done using the Trustee's usual identity verification protocols (for example, checking date of birth and National Insurance number against the Plan records). The Trustee should not respond substantively to the complaint until this verification is complete.

Investigation and response

The Trustee will:

- assess the scope and nature of the data protection complaint
- make appropriate enquiries, including working with the pensions team and professional advisers where necessary
- respond to the complainant without undue delay.

The Trustee will aim to complete the investigation within 60 days of receipt of the complaint. Where the investigation is still ongoing after 60 days, the Trustee will normally provide the complainant with an update on progress. However, this may not always be necessary or appropriate, such as where the Trustee has already been in contact with the complainant to obtain further information.

Outcome

Once the complaint has been considered, the Trustee will:

- provide a written response setting out the outcome
- explain any actions taken or proposed
- confirm the complainant's right to escalate the matter to the Information Commission's Office ('ICO') if they remain dissatisfied.

The level of detail provided to the complainant will depend on the circumstances.

Relationship with the Plan's Internal Dispute Resolution Procedure (IDRP)

Data protection complaints:

- do **not** form part of the Plan's Internal Dispute Resolution Procedure
- do **not** fall within the jurisdiction of the Pensions Ombudsman.

Complaints relating to Plan benefits or entitlement will continue to be handled under the IDRP.

In some cases, it may be unclear if the complaint relates to an infringement of the UK GDPR or some other matter. In the majority of cases, it will be easiest to treat any such complaint as being made under the UK GDPR. However, where it is genuinely unclear the Trustee may decide to: (a) nonetheless treat the complaint as being an allegation of infringement of the UK GDPR; or (b) contact the complainant for further information.

Record-keeping

The Trustee will maintain a record of all data protection complaints and their outcomes, in accordance with data protection requirements.

Escalation to the ICO

If an individual is dissatisfied with the Trustee's response, they may escalate their complaint to the ICO by completing the online form at ico.org.uk/make-a-complaint/data-protection-complaints, or by calling them on 0303 123 1113.

Review

This procedure will be reviewed periodically and updated where required to reflect legal or regulatory changes.