

THE CO-OPERATIVE PENSION SCHEME (PACE)

DATA PROTECTION COMPLAINTS POLICY

Pace Trustees Limited (“the Trustee”) is the trustee of Pace and has adopted this procedure to resolve disagreements about data protection matters relating to Pace and to ensure that any complaints relating to the use of personal data are managed appropriately.

This policy applies to both the Co-op Section and the Co-operative Bank Section of Pace.

1. Source and nature of complaint

- 1.1. Where possible, you should direct a data protection complaint to the Pace Member Services Manager at the address noted in section 4 below. However, you can also raise a data protection complaint via any channel (including verbally, in writing, or electronically) and do not need to follow a specific format or process. A complaint received through any route will be treated in accordance with this Data Protection Complaints Policy.
- 1.2. When we receive a complaint, we will identify the originator of the complaint – this is likely to be from 3 primary sources:
 - 1.2.1. The individual to whom the complaint relates (i.e. you);
 - 1.2.2. A representative of the individual to whom the complaint relates (legal guardian, solicitor, etc.); and/or
 - 1.2.3. The Information Commissioner’s Office (the “ICO”).
- 1.3. We will check the nature and cause of your complaint to ascertain:
 - 1.3.1. If it is an actual complaint or relates to another aspect of processing, i.e. a request to exercise a right under the General Data Protection Regulation (GDPR) such as data rectification, erasure, etc;
 - 1.3.2. The specific details of your complaint; and
 - 1.3.3. Whether your complaint can be resolved with little or no investigation.
- 1.4. Examples of a complaint might include:
 - 1.4.1. Not replying within the appropriate timeframe to a subject access request or not providing sufficient information to the data subject about these; or
 - 1.4.2. Questions around why data has been shared with third parties and what lawful basis justifies this.
- 1.5. Some complaints may include concerns about the administration of benefits under Pace, as well as issues relating to how personal data has been processed. Where your complaint relates solely to the administration of benefits under Pace, it will normally be considered under the Internal Resolution Dispute Procedure (“IDRP”) (available from both Pace websites ([Co-op Section](#) and [Bank Section](#))) rather than this Data Protection Complaints Policy.

- 1.6. If you are unsure whether your complaint relates to the administration of your benefits, the use of your personal data, or both, you should only submit one complaint and do not need to submit separate complaints.
- 1.7. Where your complaint is concerned with both data protection and administration of benefits, the Trustee will determine the appropriate process (or processes) to apply. This may involve:
 - 1.7.1. Considering aspects of your complaint under this data protection complaints procedure; and/or
 - 1.7.2. Considering aspects of your complaint under the IDRPs.

2. Initial response

- 2.1. The date your complaint is received will be recorded. Your complaint will be acknowledged promptly and without undue delay, and in any event within 30 days from the day after it is received.
- 2.2. When a complaint originates from the ICO, the Member Services Manager will engage with both the Data Protection Team and the Trustee's legal advisor.
- 2.3. When a complaint cannot be resolved immediately, the Member Services Manager will investigate the complaint including undertaking a thorough review of the subject of the complaint and will engage with the Data Protection Team and/or the Trustee's legal advisor, as appropriate.
- 2.4. Where any complaint relates to a third-party processor, the Member Services Manager will liaise with that processor promptly to inform them of the complaint, gather information and carry out an investigation.
- 2.5. Where an investigation is ongoing, you will be kept informed of progress where appropriate, particularly where there is any delay in responding.
- 2.6. Where your complaint indicates a potential personal data breach, this will be assessed and managed in accordance with the Trustee's Personal Data Breach Plan and Policy, including consideration of whether notification to the ICO is required.

3. Communication of decision

- 3.1. Following the investigation, a decision will be made as to whether your complaint should be upheld.
- 3.2. If your complaint is not upheld, you will be contacted without undue delay and provided with a full explanation as to why this decision has been made.
- 3.3. If your complaint is upheld, or partially upheld, you will be contacted without undue delay and provided with a full explanation as to why this decision has been made and details, as appropriate, of what corrective action has been taken.

- 3.4. In some cases, an explanation may also need to be provided to the ICO and this may be required within a particular timeframe.
- 3.5. You will be advised of your right to lodge a complaint with the ICO, as well as how to do so.

4. Contact Details

- 4.1. The Member Services Manager and the Trustee can both be contacted at:

Co-op Pensions Department
6th Floor, Department 10406
1 Angel Square
Manchester
M60 0AG

5. ICO Contact Details

- 5.1. The ICO can be contacted at:

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

ICO helpline: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

6. Record Keeping

All data protection complaints will be recorded and retained, including details of the complaint, actions taken, and outcomes, in order to support audit, governance, and regulatory requirements.

7. Policy Governance and Review

- 7.1. This policy will be reviewed at least annually and updated as required to reflect changes in legislation, regulatory guidance, or operational processes.
- 7.2. Responsibility for maintaining and reviewing this policy sits with the Trustee, supported by the Co-op Pensions Department.

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