

# Data Protection Complaints Policy

## Panavision Europe Limited Pension and Life Assurance Scheme

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|------------------------|--------------|
| <b>Date of Policy:</b> | 19 June 2026 |
| <b>Last reviewed:</b>  | N/A          |

### 1 Introduction

1.1 This Policy was established by and is maintained by the Trustees (the **Trustees**) of the Panavision Europe Limited Pension and Life Assurance Scheme (the **Scheme**). It sets out how the Trustees will respond to any complaints made by data subjects relating to an infringement of their data protection rights. This Policy has been produced following the requirements brought into force on 19 June 2026 as a result of the Data (Use and Access) Act 2025 and takes into account the [guidance](#) issued by the Information Commissioner's Office (the **ICO**) on 12 February 2026.

1.2 In this Policy, **Member** refers to active, deferred and pensioner members of the Scheme, former members of the Scheme, beneficiaries and potential beneficiaries of the Scheme and ex-spouses of members of the Scheme.

### 2 Purpose of this Policy

2.1 The Trustees are data controllers for the purposes of data protection legislation. Data controllers determine the purposes and means by which personal data is processed, while data processors handle personal data on behalf of controllers. As data controllers, the Trustees are required to:

2.1.1 give people a way of making data protection complaints to them;

2.1.2 acknowledge receipt of complaints within 30 days;

2.1.3 without undue delay<sup>1</sup>, take appropriate steps to respond to complaints, including making appropriate enquiries, and keep people informed; and

2.1.4 without undue delay, tell people the outcome of their complaints.

### 3 What constitutes a complaint?

3.1 If Members consider that the Trustees have infringed their data protection rights<sup>2</sup> because of the way their personal data (or the personal data of someone they are acting on behalf of) has been handled, they can complain. Members do not need to know the legal terms or quote the legislation to complain.

3.2 Sometimes Members may complain about other matters, whilst also exercising their data protection rights. This does not count as a data protection complaint under this Policy (ie about how their data has been handled). For example, if during a complaint under the Internal Dispute Resolution Procedure, Members request copies of their personal information or

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<sup>1</sup> What is "undue" will depend on the context and the Trustees will consider what this means on a case-by-case basis.

<sup>2</sup> Under the Data (Use and Access) Act 2025, this is an infringement of the UK General Data Protection Regulation or Part 3 of the Data Protection Act 2018.

request that their information is deleted, that would be not treated as a data protection complaint under this Policy.

- 3.3 If the Trustees are unsure whether a Member is making a data protection complaint covered by this Policy, they may ask for clarification from their advisers.

#### **4 How Members may make a complaint**

- 4.1 Members may make a complaint by filling in the form attached to this Policy and returning it to Shirley Dawkins-Williams, Pension Administrator at: [personnel@panavision.co.uk](mailto:personnel@panavision.co.uk). The form will be supplied, for completion, to any Member indicating that they wish to make a complaint covered by this Policy.

- 4.2 However, if a Member makes a complaint without using the form, the Trustees will still accept and review the complaint.

- 4.3 Members will be told that they can make a complaint to the Trustees, as well as the ICO, at the point their information is collected. This will be done by displaying this information in the Trustees' privacy notice. Members will also be reminded of this right if the Trustees are responding to a subject access request.

#### **5 Acknowledgement of the complaint**

- 5.1 The Trustees will acknowledge receipt of a data protection complaint within 30 days. The 30-day period will start on the day after the complaint has been received by the Trustees. If the last day to acknowledge the complaint falls on a weekend or a public holiday, the Trustees will have until the next working day to provide the acknowledgement. This will be done by Shirley Dawkins-Williams, Pension Administrator, confirming receipt via email. If a complaint is made not using the procedure set out in this Policy, the Trustees will still acknowledge the complaint via email.

- 5.2 If the Trustees have any doubt about the identity of the Member, they will ask for proof of ID. This will be done at the earliest opportunity. If someone is making a complaint on behalf of somebody else, the Trustees will check if that individual is authorised to act on that person's behalf by, for example, checking if there is an appropriate power of attorney or a signed letter of authority.

#### **6 Investigation of the complaint**

- 6.1 The Trustees will begin gathering information without undue delay once a complaint is received under this Policy. The time taken to investigate will depend on the complexity and scale of the issue, as well as the harm the Member has suffered.

- 6.2 After this initial investigation, the Trustees may (but at this point are not strictly obliged to) provide the Member with an initial estimate of the expected timeframe for a response. The Trustees will, however, keep the Member up to date with the investigation and keep them informed of any timeframes and explain any delays.

#### **7 Outcome of the complaint**

- 7.1 The Trustees will respond to the complaint via email from Shirley Dawkins-Williams, Pension Administrator. The Trustees will set out what they have done to resolve the complaint and any action taken as a result.

- 7.2 The Trustees will inform the Member that they have a right to complain to the ICO and provide its contact details.

## 8 **Records**

- 8.1 The Trustees will keep records of any complaint made under this Policy, the acknowledgement, any relevant conversations and documents, the outcome of the complaint and any actions taken as a result of the Trustees' investigation.
- 8.2 Once an outcome has been provided, the Trustees will review what happened and consider whether there is anything that can be learnt or improved upon to prevent future complaints.

# Form to submit a data protection complaint

## Panavision Europe Limited Pension and Life Assurance Scheme

This form should be used to make a complaint to the Trustees of the Panavision Europe Limited Pension and Life Assurance Scheme (the **Scheme**) if you believe that your data protection rights have been infringed due to the handling of your personal data. The Trustees will review your complaint and respond to you using the email address used to send this form, unless otherwise specified.

This form should not be used to make any other complaints to the Trustees. These should be made using the Trustees' Internal Dispute Resolution Procedure.

### Part One: Member Details

*If you are a member or former member of the Scheme, please provide your details below. If you are a beneficiary, potential beneficiary, ex-spouse of a member of the Scheme or a representative of a member or former member of the Scheme, please provide the member's details below.*

|                                   |  |
|-----------------------------------|--|
| <b>Full Name:</b>                 |  |
| <b>Address:</b>                   |  |
| <b>Date of Birth</b>              |  |
| <b>Email Address:</b>             |  |
| <b>Telephone Number:</b>          |  |
| <b>National Insurance Number:</b> |  |

### Part Two: Beneficiary / Ex-spouse Details

*If you are a beneficiary, potential beneficiary or ex-spouse of a member of the Scheme, please provide your details below. If you are a representative of a beneficiary, potential beneficiary or ex-spouse of a member of the Scheme, please provide their details below.*

|                          |  |
|--------------------------|--|
| <b>Full Name:</b>        |  |
| <b>Address:</b>          |  |
| <b>Date of Birth</b>     |  |
| <b>Email Address:</b>    |  |
| <b>Telephone Number:</b> |  |

### Part Three: Representative Details

*If you are complaining on behalf of someone else, please provide your details below, otherwise, please leave blank.*

|                          |  |
|--------------------------|--|
| <b>Full Name:</b>        |  |
| <b>Address:</b>          |  |
| <b>Date of Birth</b>     |  |
| <b>Email Address:</b>    |  |
| <b>Telephone Number:</b> |  |

**Part Four: Details of the complaint:**

*Please provide as much detail as possible in the space below.*

**Signed by complainant:** \_\_\_\_\_

**Full name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Completed forms should be sent via email to Shirley Dawkins-Williams, Pension Administrator at: [personnel@panavision.co.uk](mailto:personnel@panavision.co.uk)**