Nobia UK Pension Scheme

Internal Dispute Resolution Procedure ('IDRP') and Data Complaints Procedure

The Trustee endeavours to administer the Nobia UK Pension Scheme ("**the Scheme**") so that members do not have cause for complaint. However, if a problem does occur and you have been unable to resolve it to your satisfaction with the [Scheme Administrators you may wish to use the Scheme's formal complaints procedure to complain directly to the Trustee.

This procedure provides a single point of access for raising complaints relating to:

- the administration of the pension scheme through the IDRP procedure[1]; and/or
- the processing of personal data and data protection complaints[2]

While these matters may be submitted using the same process, they are governed by different legal frameworks and will be assessed and determined accordingly.

1. Who can complain

This document applies only to complaints brought against the Scheme's Trustee or Administrator. Such complaints may be brought by any person who is one of the following:

For IDRP complaints

(a) **Scheme members** (e.g. active member, deferred member, pensioner or pension credit member of the Scheme);

(b) **Survivors and beneficiaries** (e.g. widows, widowers, civil partners and dependants (child or adult))

(c) **Prospective members** (where relevant)

(d) **Former members or beneficiaries** who ceased to be in one of the above categories **within the last six months**

(e) **Anyone who claims to fall into one of these categories**, where the dispute is about whether they have that status

For data protection complaints:

Any individual who falls into categories (a) to (e) above, and

(f) Any other individual for whom the Scheme holds personal data

2. Types of complaint

[1] As set out in the Pensions Act 1995
[2] As set out in the Data Protection Act 2018 and the Data Use and Access) Act 2025

Administration of the Pension Scheme

An administration dispute arises where a member or (potential) member or beneficiary disagrees with a decision or action affecting their pension rights or benefits, including:

- benefit calculations, entitlement, or payment
- interpretation or application of the Scheme's Scheme Rules
- the exercise of a Trustee discretion
- administrative actions impacting pension benefits

These matters will be considered and determined in accordance with the Scheme's IDRP and relevant pensions legislation.

This IDRP does not apply to**:**

- Disagreements between the Scheme's members and employers;
- Circumstances which are already the subject of proceedings in any Court or Tribunal; and/or
- Matters which the Pensions Ombudsman is already investigating.

Data protection complaints

Complainants who consider that the Trustee has infringed their rights under any UK data protection legislation when handling their personal data may make complaints directly to the Trustee about this. Possible areas of complaints would include:

- not properly responding to your request for your personal information;
- not keeping information secure;
- holding inaccurate information about you;
- improperly disclosing information about you;
- keeping information about you for longer than is necessary;
- using your personal information for purposes other than those for which it was collected; or
- not upholding any of your data protection rights[3]

3. Time limit for making an application

IDRP complaints

Any application must be made before the end of a specified reasonable period. These periods are:

- Persons in category (d) above must make an application within six months of ceasing to be in categories (a) to (c).
- For all other disputes the time limit for an application is three years from the date of the act or omission that is the subject of the dispute, or three years from the date on which the individual ought reasonably to have been aware of the act or omission that is the subject of the dispute (if later).

[3] Further information on your data protection rights can be found on the ICO website '[For the public | ICO]'

The Trustee has the power to extend the time limit where that is appropriate and reasonable.

Data protection complaints

Whilst there is no strict deadline or time limit for you to submit a data complaint to us after an incident occurs, we encourage you to raise any concerns as soon as possible so we can investigate effectively.

4. Representatives

You can make a complaint either yourself or through a nominated representative.

If an applicant is a minor (under 18 years) or is incapable of acting for themselves then an application may also be made (or continued) on their behalf by an adult member of their family or some other suitable adult representative.

Following the death of an applicant, an application can be made (or continued) by the Personal Representative of their estate.

5. How to Apply?

You (or your representative, if applicable) should fill in the Complaint Form at the end of this procedure and send it to the Scheme Trustee at the address below.

The Trustee of Nobia UK Pension Scheme
c/o Independent Governance Group
4th Floor, Cannon Place
78 Cannon Street
London
EC4N 6HL

6. Acknowledgement

You will normally receive an acknowledgement of your complaint within 5 working days of receipt. If your complaint relates both to administration matters and data protection matters, the Trustee will note this in its acknowledgement and may respond separately to each.

7. Formal decision

The Trustee must make a decision within a reasonable period of receiving your application and may ask for further evidence and information from you so that all relevant circumstances can be taken into account.

If it is not possible for a decision to be reached within the time periods set out below, an interim reply will be sent setting out the reason(s) for the delay and an expected date for issuing the substantive decision. The Trustee will also keep you reasonably informed of progress in dealing with your complaint, to the extent appropriate.

If there is anything you do not understand about the complaints process, you should contact the Scheme/Plan administrators using the contact details in section 5 of this procedure.

IDRP complaints

The Trustee will formally respond to you (or your representative, if applicable) as soon as it's able to do so and in any event within four months of receiving your submission. You will be provided with a written response to your complaint.

In giving it's response, the Trustee will state:

- What it's decision is and the reasons why; and
- the legislation and/or Scheme Rules which have been relied upon in reaching a decision, including how they have been applied to your complaint.

Data protection complaints

The Trustee will formally respond to you (or your representative, if applicable) in writing setting out its conclusions in relation to your complaint, once investigations are complete. In normal circumstances you will receive a response within two months, or earlier if the Trustee is able to do so.

8. Appealing the decision

IDRP complaints

If you are not satisfied with the outcome of your complaint, you have the right to refer your complaint to The Pensions Ombudsman free of charge. The Pensions Ombudsman deals with complaints and disputes which concern the administration and/or management of occupational and personal pension schemes.

Information related to referring a complaint to The Pensions Ombudsman can be found on their website (www.pensions-ombudsman.org.uk) or by using the link below:

Can I complain? | The Pensions Ombudsman

Data protection complaints

If you are not satisfied with the outcome of your complaint, you have the right to refer your complaint to The Information Commissioners Office (ICO) free of charge. The ICO deals with complaints and disputes which concern the way in which your personal information (or the personal information of someone you are representing) has been handled.

Instructions on complaining to the ICO about the use of your personal data can be found on the ICO website (ico.org.uk) or using the link below. Whilst there is technically no legal deadline for general data protection complaints, the ICO strongly recommends escalating issues promptly.

Make a complaint about how an organisation has used your personal information | ICO

9. Helpful resources

If you have general requests for information or guidance concerning your pension arrangements, you can contact MoneyHelper.

MoneyHelper
Tel: 0800 011 3797
Webchat: https://www.moneyhelper.org.uk/PensionsChat/
Online enquiry form: https://www.moneyhelper.org.uk/en/contact-us/pensions-guidance/pensions-guidance-enquiry-form
Website: Pensions and retirement | Help with pensions and retirement | MoneyHelper

Please note that they are unable to deal with incoming postal enquiries or send replies by post. A postal contact address is therefore not supplied.

Information Commissioner's Office

Further information on how to make a data protection related complaint can be found on the ICO website (ico.org.uk) or using the link below.

How to make a data protection complaint to an organisation | ICO

June 2026

Nobia UK Pension Scheme

Complaints and Disputes Form

Application form for a decision by the Trustee

This form is to be completed by persons who wish to make a formal complaint against the Trustee of the Scheme or your representative if appropriate.

The Trustee will determine whether your complaint is an administration complaint, a data protection complaint or both and will confirm as part of the acknowledgement how it is treating the issues you have raised.

Please complete this application form (BLOCK CAPITALS ONLY) and return to the address shown at the end of this form.

Section A – to be completed by all applicants

Full name of Complainant	
Address	
Date of Birth	
National Insurance No	
Category of Applicant[1]	
Member/Policy reference (if known or applicable)	

[1] See section 1 of the policy for details of who can raise a dispute under this policy.

Section B – completed by beneficiaries only

If you were not the original member of the scheme (e.g. widows, widowers, civil partners, dependants (child or adult)) or are a pension credit member please provide details below of the member as this will help us match you to the correct record.

Your relationship to the member	
Full name of member	
Date of Birth of member	
Last address of the member	
National Insurance no of the member	
Member / Policy number of the member (if known)	

Section C- completed by representatives only

To be completed only if you have a representative acting on your behalf

Full name of representative	
Address	

Is this address to be used for receipt of documents in relation to this complaint: Y / N

Written evidence of the representative's authority to act on behalf of the member or beneficiary must be provided and be acceptable to the Trustee. If the member or beneficiary is unable to sign a letter of authority, evidence that the representative can act on their behalf (for example, evidence of Power of Attorney) will be required.

Section D - to be completed by all applicants

Please provide a statement as to the nature of your complaint (including sufficient details to show why it is being raised) and what kind of resolution you are looking for. Please provide copies of any relevant documentation you wish to be considered in support of your complaint.

(Please continue on separate sheets as necessary)

Please return this form to the Trustee of the Nobia UK Pension Scheme, Independent Governance Group, 4th Floor, Cannon Place, 78 Cannon Street, London, EC4N 6HL. If you would rather email your form please send to victoria.baxter@weareigg.com

Emailed forms should be password protected and a telephone number provided so the administrator can call you for the password. Passwords should not be sent via email even as a separate email trail.

Signature of complainant or person signing on their behalf	
Full name	
Date	