

BMW PENSION TRUSTEES LIMITED

**INTERNAL DISPUTE RESOLUTION PROCEDURE FOR
THE BMW (GB) LIMITED EMPLOYEE BENEFITS PLAN**

TO: THE SECRETARY
BMW PENSION TRUSTEES LIMITED

i	Full Name	_____
ii	Address	_____ _____ _____
iii	Date of Birth	_____
	National Insurance Number	_____
iv	If you are the widow/widower or surviving dependant of a deceased member, as well as your own full name, address and date of birth, please give the particulars of the scheme member and the full name, address, date of birth and (if possible) National Insurance number of the scheme member. _____ _____ _____ _____ Date of Birth _____ National Insurance Number _____	
v	You may nominate a representative to either make or continue an application under this procedure on your behalf. In such a case the full name and address of any such representative should be given. Please state clearly whether this address is the one to which any documents relating to the disagreement should be sent. _____ _____ _____	
Note: If the representative's address is confirmed as the contact address, copies will not also be sent to you.		

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vi	Statement as to the nature of the disagreement (Please provide sufficient details to show why you are aggrieved, and continue on separate sheets as necessary)
vii	What loss do you consider has been suffered?
viii	What steps if any, have you taken to reduce this loss?
ix)	How do you feel you should be compensated?

Signature (you or your representative, please state which category) Date _____

If there is not sufficient space please use another sheet. Do not forget to sign and date the page after completing your entry.

Once completed this form, and the completed form headed 'Internal Dispute Resolution Procedure: Explicit Consent Request' should be sent by email to the Secretary, BMW Pension Trustees Limited; karen.craddock@bmwgroup.com

BMW (GB) LIMITED EMPLOYEE BENEFITS PLAN GUIDE TO USING THE INTERNAL DISPUTE RESOLUTION PROCEDURE

The Pensions Act 1995 as amended by the Pensions Act 2004, the Pensions Act 2007 and the OPS (IDRP Consequential and Miscellaneous Amendments) Regulations 2008 requires the trustees of an occupational pension scheme to make arrangements for the resolution of disagreements relating to the scheme.

This document sets out the arrangements which have been adopted by the Trustee of the BMW (GB) Limited Employee Benefits Plan (the "Scheme") for the purposes of resolving disagreements relating to the scheme.

This document also sets out how data-related complaints will be handled by the Trustee. From 19 June 2026, the Data (Use and Access) Act 2025 requires the Trustee, as a data controller, to have in place a process for handling complaints relating to the infringement of UK data protection legislation. The Trustee has incorporated this process into the Internal Dispute Resolution Procedure so that all types of complaints are dealt with under the same procedure.

The Pensions Ombudsman is available to assist members and beneficiaries of the Scheme in connection with any difficulties which they have with the Trustee and/or administrators of the Scheme. The Money and Pensions Service is also available to assist members and beneficiaries with any general requests for information or guidance concerning their pension arrangements. The Information Commissioner's Office is available in respect of data-related complaints. Some further information, together with contact details are given at the end of these notes.

What is a Dispute?

This is an opportunity for a person to formalise a complaint about the Trustee and the administration of the Scheme, their membership and their retirement benefits. This includes data-related complaints.

What is a data-related complaint?

A data-related complaint is a complaint where a person considers the Trustee has infringed UK data protection legislation in handling their personal data. This might include, for example, a complaint that their personal data has been processed without a lawful basis, that their data has been shared inappropriately or that the Trustee has failed to respond to a data subject access request within the required timescales.

Complainants

Non-Data Related Complaints

The Internal Dispute Resolution Procedure can be used if certain people have a disagreement with the Trustee. The following people may make a complaint:

1. A member of the Scheme;
2. A surviving spouse, civil partner or dependant of a deceased member;
3. Anyone who ceased to be a member or beneficiary in any of the above categories (provided the complaint is made within six months of ceasing to be so); and
4. Anyone claiming to be in one of the above categories (provided the complaint is made within six months of first making that claim).

A person listed above may nominate a representative to make an application under the Internal Dispute Resolution Procedure on their behalf. An application may also be made or continued on their behalf:

1. if they have died, by their personal representative;
2. if they are a minor or otherwise incapable of acting for themselves, by a member of their family or some other person suitable to represent them; and
3. in any other case, by a representative nominated by them.

Data Related Complaints

In addition, any person who considers that the Trustee has infringed UK data protection legislation in connection with their personal data may raise a data-related complaint under the Internal Dispute Resolution Procedure, whether or not they fall within any of the categories listed above.

If somebody is complaining on behalf of someone else, they should also give their own full name and address and state whether this address is to be used for correspondence. They should sign their own name if making the complaint on behalf of the complainant. A person cannot make complaints on behalf of a deceased individual.

Formal Procedure

If a person believes he or she has a valid complaint against the Trustee, the following formal procedure for submission of an application under the Internal Dispute Resolution Procedure should be followed.

In the following procedure, the person who is in disagreement with the Trustee is referred to as “the Complainant”.

Initial Application

The Complainant should write to the Secretary of the BMW (GB) Limited Employee Benefits Plan (“the Secretary”) at the address given below setting out particulars of the disagreement. An Application Form, designed to assist the Complainant in connection with this initial application, is attached. The particulars should include:

- I. The full name, address, date of birth and (if possible) National Insurance Number of the Complainant.
- II. If the Complainant is a widow, widower or surviving dependant of a deceased member, as well as the Complainant’s own full name, address and date of birth, the particulars should also include his or her relationship to the Scheme member and the full name, address, date of birth and (if possible) National Insurance Number of the Scheme member.
- III. Where a person has nominated a representative either to make or continue an application under this procedure on his or her behalf, the full name and address of any such representative should be given. It should be made clear whether this address is the one to which any documents relating to the procedure should be sent. If the Representative’s address is confirmed as the contact address, copies will not also be sent to the Complainant.
- IV. A statement as to the nature of the disagreement with sufficient details to show why the Complainant is aggrieved and details of the loss suffered.
- V. The application should be signed by or on behalf of the Complainant.

If the Complainant has a data-related complaint, their complaint does not need to be in writing and they may make a complaint to the Trustee by other means (for example by email to the Secretary at karen.craddock@bmwgroup.com).

Notice of a Decision

The Trustee has appointed the Secretary to review applications received at this initial stage of the procedure.

If the Complainant has a data-related complaint, they will be sent a written acknowledgement of their complaint within 30 days of receipt. The Secretary will:

- consider their complaint and provide a substantive response without undue delay;
- where appropriate, keep the Complainant updated as to the progress of the complaint; and
- make a decision and communicate the outcome without undue delay once the investigation is complete.

If, at the time the Complainant's data-related complaint is made, the Secretary is not available to consider it, the Trustee will nominate an alternative decision maker to ensure that their complaint is dealt with without undue delay.

For all other complaints, within 7 working days of receipt of an Application which meets the above requirements, the Secretary will write to the Complainant confirming the formal date of receipt of the Application. If the Application does not provide adequate information, the Secretary will write to the Complainant requesting the additional information required. Within 7 working days of receipt of this additional information, the Secretary will confirm the formal date of receipt of the Application to the Complainant.

The Secretary will consider the application and, within two months of receipt, will write to the Complainant. This notice will either set out the decision on the matters raised by the Complainant or, if it has not been possible to reach a decision, give an interim reply setting out reasons for the delay and an expected date for the issue of the decision. In addition to giving a statement of the decision, the notice will also refer to any legislation or relevant Scheme Rules relied upon in reaching the decision. Where a discretion has been exercised, a reference to the parts of the Scheme Rules conferring the discretion will be made. Reference will be made to the Complainant's right to refer the disagreement for reconsideration by the Trustee as set out below and the Complainant will also be reminded that the Pensions Ombudsman is available to provide assistance with the complaint.

Referral of Disagreement to the Trustee

If the Complainant does not accept the decision taken following the initial application stage of the process, he or she can move to the second stage, which is an application to the Trustee to reconsider the disagreement. Any such application must be made within six months of the date of the notice issued by the Secretary in connection with the initial application.

The second stage application must again be in writing and should be sent to the Secretary, who will refer the matter to the Trustee. The application should set out particulars of the grounds on which the application is made, including all the items referred to above in respect of the initial application, together with a copy of the notice of the decision made following the initial application and a statement of the reasons why the Complainant is dissatisfied with the decision. A statement must also be made that the Complainant wishes the disagreement to be considered by the Trustee. The application must be signed by or on behalf of the Complainant.

An Application Form, designed to assist the Complainant in connection with this application for consideration by the Trustee, will be sent by the Secretary upon request from the Complainant.

Within 7 working days of receipt of an Application which meets these requirements, the Secretary will write to the Complainant confirming the formal date of receipt of the Application. If the Application does not provide adequate information, the Secretary will write to the Complainant requesting the additional information required. Within 7 working days of receipt of this additional information, the Secretary will confirm the formal date of receipt of the Application to the Complainant.

Please note that in the case of a data-related complaint, there will be no option to make an application for the Trustee to reconsider the disagreement. If the Complainant's complaint is a data-related complaint, the full response will also include an explanation of what the Trustee has done to resolve the complaint and any actions it has taken, along with details of how to complain to the relevant regulatory authority. A request can be made for the Trustee to review if it has a review process in place.

Notice of decision from the Trustee

The Trustee will issue a notice in writing to the Complainant within 2 months of the date on which the above application is received. This notice will either set out the decision or, if it has not proved possible to reach a decision within two months, an interim reply will be given which will give the reasons for the delay and an expected date for issuing the decision.

The notice will include a statement of the decision and an explanation as to whether or not this replaces or confirms the decision made at the initial stage. Reference to any legislation or Scheme Rules relied upon will also be made. Where any discretion has been exercised, reference to the parts of the Scheme Rules conferring the discretion will be made.

Reference will also be made to the right to complain to the Pensions Ombudsman if dissatisfied with the Trustee's decision and that if the Complainant has yet to contact the Pensions Ombudsman this needs to be done within three years of when the event(s) complained about happened, or, if later, within three years of when the complainant first knew about it (or ought to have known about it). There is a discretion for those time limits to be extended. Some information about the role of the Pensions Ombudsman and its contact details are set out below.

As set out above, this process does not apply to data-related complaints.

The Pensions Ombudsman

The Pensions Ombudsman is appointed under the Pensions Scheme Act 1993 to deal with complaints and disputes which concern the administration and/or management of occupational and personal pension schemes. He is completely independent and acts as an impartial adjudicator.

If a Complainant makes a complaint to the Pensions Ombudsman after completion of the Scheme's complaint procedure, then, following an investigation of the case, the Pensions Ombudsman will send a written statement of his decision (known as a determination) to the Complainant and to the Scheme. If necessary, he can direct the trustees of a scheme to take relevant steps to rectify the situation. His decision is final and binding on both parties - subject only to an appeal to the High Court on a point of law.

The Pensions Ombudsman can be contacted at:
Address: 10 South Colonnade, Canary Wharf, London E14 4PU
Telephone: 0800 917 4487
Email: enquiries@pensions-ombudsman.org.uk
Website: www.pensions-ombudsman.org.uk

Information Commissioner's Office

If the Complainant's complaint is a data-related complaint, they also have the right to complain to the Information Commissioner's Office ("ICO") at any time. The Complainant does not have to exhaust the Internal Dispute Resolution Procedure before contacting the ICO, although the ICO will usually ask that they raise their complaint with the Trustee first.

The ICO can be contacted at:

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

Telephone: 0303 123 1113

Website: www.ico.org.uk

The Complainant can also submit a complaint form online: <https://ico.org.uk/make-a-complaint/>

Money and Pensions Service

If the Complainant has general requests for information or guidance concerning their pension arrangements they may contact:

The Money and Pensions Service, Borough Hall, Cauldwell Street, Bedford, MK42 9AB.

Website: <https://moneyandpensionsservice.org.uk>.

ADDRESS FOR CORRESPONDENCE

All correspondence relating to applications under this procedure, including the form headed 'Internal Dispute Resolution Procedure: Explicit Consent Request' should be sent by email to:

Karen.Craddock@bmwgroup.com

The Secretary
BMW Pension Trustees Limited
Summit ONE
Summit Avenue,
Farnborough
GU14 0FB

INTERNAL DISPUTE RESOLUTION PROCEDURE: EXPLICIT CONSENT AGREEMENT

To the Trustee of the BMW (GB) Limited Employee Benefits Plan (the "**Scheme**").

I consent to the Trustee processing my personal data provided by or on behalf of me (or already held by the Trustee) as is necessary for the purpose of recording, considering and responding to my complaint, in particular any sensitive personal data such as information relating to my personal relationships and/or my health where that is considered by the Trustee to be relevant to the complaint.

I agree that the Trustee may share any such relevant sensitive personal data with the Trustee's legal and actuarial advisers, the Scheme's administrators, the Trustee's other professional advisers, the Scheme's sponsoring employer (and its legal advisers), and such other parties as it considers necessary to fulfil the purpose. Details of who the Trustee/Scheme's advisers and service providers are can be found in the Trustee's data protection notice, which can be obtained by contacting Pensions Administration, BMW (GB) Limited Employee Benefits Plan, Aon Scanning Division, PO Box 196, Huddersfield, HD8 1EG, or at bmw.gb@aon.com.

I am aware that I have the right to withdraw my consent to the processing of my sensitive personal data at any time by writing to you. However, I acknowledge that the Trustee may consider that it has other lawful grounds for processing that data in any event. I also acknowledge that withdrawal of my consent to processing my sensitive personal data may mean it is not possible for the Trustee to consider my request.

I note that I can obtain further information on data protection in general from the ICO at <https://ico.org.uk/>.

Signed

Date

Name