



Data protection complaints procedure

- 1 This document contains a **Data protection complaints procedure**, outlining our process for managing data protection complaints under the UK General Data Protection Regulation (UK GDPR), and the Data Protection Act 2018 (DPA 2018).
- 2 We are committed to providing a high-quality service, in accordance with data protection law. At all times, we seek to comply with data protection principles and use personal data lawfully, fairly and transparently. For further information, please see our Transparency Notice.
- 3 We acknowledge that we may not always get things right, so if something has gone wrong, we need you to tell us. This will help us to improve our standards of service and data protection controls.
- 4 This procedure applies to all individuals whose personal data is processed by us, including clients, third parties and staff.
- 5 References to calendar days mean all consecutive days, including weekends and bank holidays.

6 How to make a data protection complaint

- 6.1 We encourage individuals to raise any concerns with us informally in the first instance, so that we can try to resolve the matter quickly and constructively. Please kindly contact the member of staff you have been dealing with, or the Risk and Compliance team. If the matter cannot be resolved informally, or if you would prefer to make a formal complaint, you can do so using the process set out in this procedure.
- 6.2 To help us respond to your concerns in a timely manner, we kindly ask that you refrain from submitting multiple complaints regarding the same issue. Multiple submissions can delay our ability to provide a response.
- 6.3 The table below shows the different ways you can contact us to make a complaint.

How to make a data protection complaint	More information
By completing our data protection complaint form	<p>The form to make a data protection complaint can be found here or we can post a copy to you.</p> <p><u>We will not accept complaints via this form other than those relating to data protection concerns.</u></p> <p>You may prefer to complain to us using one of the other methods set out in this table.</p>
By emailing us	You can email us an electronic copy of your completed complaint form or details of your complaint at compliance@vww.co.uk .
By writing to us	You can write to us with a hard copy of your completed complaint form or details of your complaint at:

	<p><i>FAO Maria Hill</i></p> <p><i>Narrow Quay House, Narrow Quay, Bristol, BS1 4QA</i></p>
By telephoning us	You can telephone us on 0117 925 2020.

- 6.4 Some complaints may relate solely to the handling of personal data and may therefore be dealt with under this procedure alone. Other complaints may raise wider issues concerning our conduct, decisions or procedures, whilst also including elements relating to personal data or data protection.
- 6.5 We will exercise reasonable judgement in determining whether a complaint is more appropriately dealt with under this policy or under our Complaints Policy, taking into account the substance of the complaint as a whole, including whether any data protection concerns form part of a broader issue.
- 6.6 Where a complaint raises wider issues beyond data protection matters, it will generally be dealt with under the Complaints Policy, which is intended to ensure compliance with our obligations under data protection law whilst preserving access to our full complaints process.

7 **Acknowledging and verifying your complaint**

- 7.1 We will acknowledge your complaint within 5 days of receiving it.
- 7.2 We will take reasonable steps to verify the identity of the person making the complaint. This may involve requesting further information or documentation from you. If the complaint is made on behalf of someone else, we will also need to check that the person making the complaint is properly authorised to do so.
- 7.3 If we have requested additional information, written confirmation of authority or identification, the time limit for responding to the request is paused until we receive clarification.
- 7.4 If, having requested additional information, we are not satisfied that we have identified the person making the complaint or that they have proper authority to make the complaint, we may be unable to deal with it.
- 7.5 We discourage complaints written using AI. This is because AI-generated complaints often fail to reflect the complainant's voice, lack specific detail and can be legalistic, making a complaint more complex than necessary. We may request clarification or summarisation where a complaint is excessively lengthy, contains irrelevant or generic material, or includes inaccurate legal assertions which obscure the substance of the concern. We reserve the right to limit its investigation and response to the substantive issues raised.
- 7.6 We do not accept the use of the complaints procedure as a means to seek general information about our compliance. Complaints must focus on concerns or issues relating to the complainant's personal data.

8 **Investigating your complaint**

- 8.1 We will investigate your complaint. This will usually involve:
- 8.1.1 reviewing your complaint;

- 8.1.2 locating and reviewing the records we hold about you;
 - 8.1.3 establishing the relevant facts; and
 - 8.1.4 *liaising with individuals who you may have dealt with.*
- 8.2 Your complaint will usually be reviewed by a Risk and Compliance Solicitor.
- 8.3 We will respond to your complaint promptly with any decision or proposed action. We will aim to do this within 30 days of receiving your complaint or, if later, receipt of a copy of your identification or written confirmation of your authority.
- 8.4 We may also need to ask you for further information or documents. If so, we will ask you to provide the information within a specific period of time.
- 8.5 We will update you on the progress of your complaint at appropriate times.
- 8.6 If we are unable to conclude the investigation of your complaint within the original 30 days, we are entitled to request a further 60 days to investigate your matter fully.
- 8.7 We may reject your complaint if it does not fall within the scope of this complaints procedure. For example, if your complaint is about the Firm's approach to data protection generally and does not relate to personal data.

9 **Notifying you of the outcome of our investigation**

- 9.1 We will inform you of the outcome of the complaint without undue delay.
- 9.2 We will explain clearly what we've done to resolve your complaint and, where appropriate, any action we have taken as a result.

10 **What to do if we cannot resolve your complaint**

- 10.1 If you are unhappy with the outcome of your complaint, you can complain to the Information Commissioner's Office (**ICO**) or you can seek to take action in the courts.
- 10.2 The ICO's contact details are:

Address	Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Helpline number	0303 123 1113

- 10.3 More details on how to complain to the ICO are available on the [Complaints page](#) of the ICO's website. You should usually submit your complaint to the ICO within three months of your last contact with us.