

## **Privacy Complaints Handling Process (Draft)**

### **1. Purpose**

This process sets out how privacy-related complaints are received, assessed, investigated, and resolved, ensuring compliance with UK data protection requirements, including the statutory complaints handling obligation effective 19 June 2026.

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### **2. Scope**

This process applies to:

- All complaints relating to the handling of personal data
  - Complaints received via any channel (email, webform, HR, account teams, etc.)
  - All Allegis Group EMEA operating companies
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### **3. Definition**

A privacy complaint is:

A statement that something is wrong or unsatisfactory in relation to the use of personal data.

This includes dissatisfaction with:

- Data handling
  - Responses to DSARs
  - Accuracy, retention, or disclosure of data
  - Any perceived breach of data protection rights
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### **4. Complaint Intake & Submission**

#### **4.1 Accepted Channels**

Complaints may be received via:

- OneTrust (preferred route)
- Email (Privacy mailbox or business teams)
- Website contact forms
- Verbal or indirect submissions via business teams

Key principle: A complaint does not need to be labelled as a “complaint” to be treated as one.

#### 4.2 Standard Approach

- Where possible, complaints should be redirected or logged in OneTrust
- If received outside OneTrust, the Privacy Team will log the complaint on behalf of the individual

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### 5. Triage & Ownership

#### 5.1 Initial Triage

Upon receipt, complaints are assessed to determine scope and ownership:

Type of Complaint	Owner
Privacy-related	Privacy Office (Rhodes, Steven)
Non-privacy	Risk & Compliance (Legge, Graham)
Mixed	Split where possible, otherwise Privacy Office

#### 5.2 Conflict Handling

- If the complaint names the Privacy lead, it is reassigned to an alternative senior owner (e.g. Risk & Compliance)

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### 6. Acknowledgement & Timelines

- Complaint acknowledged within 30 days
- Substantive response provided within 30 days (target)
- If required, an appeal window of 30 days may apply

Complainants must be kept informed if investigation is ongoing.

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## 7. Investigation Process

The assigned owner will:




- Gather relevant facts and documentation
- Engage relevant stakeholders (HR, Legal, business teams)
- Assess compliance with data protection obligations
- Identify any remediation actions

For complex or serious complaints:

- Escalation to senior leadership or a formal investigation team may be required
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## 8. Outcomes

Complaints may be:

-  Upheld
-  Dismissed
-  Upheld in part (with recommendations)

All outcomes must include:

- Clear explanation of findings
  - Any remedial action taken
  - Next steps (including appeal rights where applicable)
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## 9. Communication Requirements

### 9.1 To Complainant

- Written response explaining outcome
- Clear, accessible language
- Ongoing updates where required

### 9.2 ICO Escalation

Complainants must be informed:

- They can escalate to the Information Commissioner's Office (ICO)
- Internal complaints process should be used first

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## **10. Record Keeping**

The Privacy / Risk & Compliance Team must:

- Log all complaints and communications
  - Maintain a central record (e.g. OneTrust)
  - Retain investigation documentation and outcomes
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## **11. Integration with DSAR Process**

All DSAR responses must include wording such as:

“If you are dissatisfied with how we have handled your personal data or this request, you have the right to raise a data protection complaint with us... You also have the right to contact the ICO.”

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## **12. Awareness & Training**

- All employees must be able to:
    - Recognise a complaint
    - Forward it to the correct channel
  - Business-wide communications issued ahead of implementation
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## **13. Key Compliance Principles**

The process must ensure:

- Accessibility (clear routes to complain)
- Timely handling
- Transparency of outcomes
- Documented audit trail
- Alignment with UK data protection requirements