



DATA PROTECTION COMPLAINTS POLICY / PROCEDURE

1. Purpose

This policy sets out the firm's process for receiving, logging, investigating and responding to data protection complaints. It is intended to ensure that complaints are handled fairly, consistently and in line with applicable UK data protection law, including the requirements that take effect on 19 June 2026.

2. Scope

This policy applies to all partners, directors, consultants, employees, temporary staff, contractors and any other person who may receive, escalate or assist with a data protection complaint. It covers complaints made by clients, prospective clients, employees, workers, job applicants, suppliers, website users and any other individual whose personal data the firm processes.

3. Legal and Regulatory Framework

This policy supports compliance with the UK General Data Protection Regulation, the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

4. Roles and Responsibilities

The partners are responsible for ensuring that the firm has an effective complaints process and sufficient resources to operate it. The person with lead responsibility for data protection must oversee the handling of data protection complaints, maintain records, monitor compliance, and act as the main point of contact for complaint escalation. All staff must recognise any expression of dissatisfaction about the handling of personal data and escalate it promptly in accordance with this policy.

5. Data Protection Complaints Procedure

In taking our responsibility seriously we set out below a clear, accessible and effective process for receiving and handling data protection complaints.

A data protection complaint may be made by any reasonable means, including email, letter, telephone, or verbally to a member of staff. Staff must recognise and escalate any expression of dissatisfaction about how personal data has been handled, even where the individual does not use legal or technical language.

If you have a data protection complaint please contact our Data Protection Officer / Data Protection Lead: Mr Paul Hughes at 26 Regent Street, Rugby, CV21 2PS, by telephone on 01788 222850 or by email paul@kundert.co.uk



The complaint will be acknowledged in writing within 30 days. The acknowledgement will tell you who is dealing with the data protection complaint and send you a copy of this policy

The data protection complaint will be investigated, and appropriate steps will be taken to respond without undue delay. However, we may, if necessary, invite you to a meeting or make a telephone appointment to discuss and hopefully resolve your data protection complaint.

Should a meeting or telephone appointment take place, we will write to you to confirm what took place, any solutions agreed and your right to escalate.

If a meeting or telephone appointment does not take place, we will send you a detailed written reply to your data protection complaint including any suggestions to resolve the matter and your right to escalate.

Following the above if you are still not satisfied you should contact us again and we will arrange for another Partner, or someone unconnected with the matter, or the firm to review our original decision.

In the event a review takes place and you still remain dissatisfied then you may make a complaint to the Information Commissioner's Office (ICO).

The Information Commissioner's Office (ICO) can help you if we are unable to resolve your data protection complaint ourselves. They will look at your complaint independently.

The Information Commissioner's Office can be contacted as follows:-

Information Commissioner's Office - <https://ico.org.uk/>

Telephone number: 0303 123 1113

<https://ico.org.uk/make-a-complaint/personal-information-complaint/>

6. Complaint Records, Related Incidents and Escalation

All data protection complaints will be recorded and retained securely. Where a complaint reveals a possible personal data breach, repeated control failure or other wider compliance issue, it must be escalated promptly under the firm's incident or risk management procedures. The firm will assess whether remedial action, staff guidance, process changes or regulatory notification is required.

All data protection complaints will be logged with the date received, the complainant's details, the nature of the complaint, the acknowledgement date, the steps taken to investigate, the outcome, and any remedial actions. Records will be kept securely and retained in accordance with the firm's retention rules.

7. Training, Monitoring and Review

All staff will undertake data protection training appropriate to their role and refresh this at least annually. Compliance with this policy will be monitored through periodic review, spot checks, complaint and incident analysis, and updates to procedures where required. This policy will be reviewed at least annually and sooner if there is a material change in law, regulatory guidance, systems or processing activities.