



Data Protection Complaints Procedure

1. Purpose

This procedure explains how RPP Group handles complaints relating to the use, processing, storage, sharing, retention, or protection of personal data.

We are committed to handling personal data lawfully, fairly, transparently, and securely in accordance with:

- UK GDPR
- Data Protection Act 2018
- The Data (Use and Access) Act 2025
- Applicable guidance issued by the Information Commissioner's Office

This procedure is intended to meet the complaint-handling requirements introduced under the Data (Use and Access) Act 2025, including maintaining an accessible complaints process and informing individuals of complaint outcomes.

2. Scope

This procedure applies to complaints from:

- Clients
- Employees
- Contractors
- Suppliers
- Website users
- Members of the public

It covers concerns relating to:

- Collection or use of personal data
 - Accuracy of personal data
 - Unauthorised disclosure of personal data
 - Data security or confidentiality breaches
 - Marketing communications
 - CCTV or monitoring concerns
 - Retention or deletion of data
 - Subject Access Requests (SARs)
 - Automated decision-making
 - Failure to comply with data protection rights
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3. Data Protection Principles

RPP Group will ensure that personal data is:

- Processed lawfully, fairly, and transparently

<https://rexprocterpartners.sharepoint.com/sites/TRM/Office Policies and Procedures/Group Policies/Data Protection Complaints Procedure.docx>



- Collected for specified purposes
 - Adequate, relevant, and limited to what is necessary
 - Accurate and kept up to date
 - Retained only as long as necessary
 - Kept secure and confidential
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4. How to Make a Complaint

Complaints may be made:

- By email
- In writing
- Via the company website complaint form
- In person
- By telephone

Complaints should include:

- Full name and contact details
- Details of the concern
- Relevant dates
- Any supporting evidence or correspondence
- Preferred outcome (if applicable)

Complaints should be sent to:

Data Protection Lead

RPP Limited

First Floor, Riverside West, Whitehall Road, Leeds, LS1 4AW

privacy@rpp.co.uk

0113 243 3731

The business will make this procedure easily accessible electronically in accordance with the Data (Use and Access) Act 2025 requirements.

5. Complaint Handling Process

Stage 1 – Acknowledgement

We will:

- Acknowledge receipt of the complaint within **5 working days**
 - Record the complaint in the Data Protection Complaints Register
 - Assign the complaint to an appropriate manager or data protection lead
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Stage 2 – Investigation

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The business will investigate the complaint fairly and proportionately.

The investigation may include:

- Reviewing systems and records
- Reviewing emails or communications
- Speaking with relevant staff members
- Assessing legal and regulatory obligations
- Requesting further information where necessary

Where appropriate, the business may temporarily suspend processing activities while the complaint is investigated.

Stage 3 – Response

We aim to provide a written response within **30 calendar days** of receipt of the complaint.

The response will include:

- A summary of the complaint
- Findings of the investigation
- Any corrective actions taken
- Whether the complaint has been upheld, partially upheld, or rejected
- Information about escalation rights

Where additional time is required, the complainant will be informed of:

- The reason for delay
- The revised response timeframe

6. Outcomes and Remedies

Where a complaint is upheld, the business may:

- Correct inaccurate information
- Restrict or stop unlawful processing
- Delete personal data where appropriate
- Improve internal procedures
- Provide additional staff training
- Issue an apology
- Report relevant breaches to the ICO where legally required

7. Escalation and ICO Complaints

If the complainant is dissatisfied with the outcome, they may request an internal review by a director or senior manager within **14 days** of the decision.

<https://rexprocterpartners.sharepoint.com/sites/TRM/Office Policies and Procedures/Group Policies/Data Protection Complaints Procedure.docx>



Following the internal review, the business will issue a final response.

Individuals also have the right to complain to the:

Information Commissioner's Office

You can find further information via:

[ICO Official Website](#)

8. Subject Access Requests and Related Rights

This complaints procedure does not replace an individual's statutory rights under UK data protection legislation, including rights to:

- Access personal data
- Rectification
- Erasure
- Restriction of processing
- Data portability
- Object to processing
- Challenge certain automated decisions

The Data (Use and Access) Act 2025 introduced updated provisions relating to complaint handling and subject access request processes.

9. Confidentiality

All complaints will be handled confidentially and only shared internally where necessary for investigation and resolution.

Records will be stored securely in accordance with the company's retention and security procedures.

10. Record Keeping

The company will maintain a secure register of:

- Complaints received
- Dates and actions taken
- Investigation outcomes
- Corrective actions implemented
- Closure dates

Records will be retained in accordance with the company's retention schedule and applicable legal obligations.



11. Training and Awareness

Relevant staff will receive appropriate training on:

- Data protection obligations
- Complaint handling
- Confidentiality
- Security procedures
- Individual rights under UK data protection law

12. Review of Procedure

This procedure will be reviewed:

- Annually
- Following significant legal or regulatory changes
- Following serious complaints or data breaches

13. Approval

| Version | Date | Approved By |
|----------------|-------------|--------------------|
| 1.0 | 8 May 2026 | Alex Blenard |