

Business Policy: Personal Data – Complaints Procedure

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1. Purpose

This policy explains how Semperian handles complaints about the way it uses personal data, in line with the **Data (Use and Access) Act 2025**, which introduces a statutory right for individuals to complain directly to organisations about data protection matters before contacting the Information Commissioners Office (**ICO**).

2. Scope

This policy applies to all complaints from individuals regarding their rights under the UK GDPR and other relevant data protection legislation in force in the UK (**Data Protection Law**) who believe that Semperian has infringed their data protection rights when processing their personal data, including concerns relating to:

- collection or use of personal data;
- data security or confidentiality;
- handling of data subject rights requests; or
- retention or accuracy of personal data.

3. How to Make a Complaint

Individuals may submit a data protection related complaint falling within the scope of this policy (**Complaint**) to Semperian's GDPR Team using any of the following methods:

- verbally;
- by email to GDPR@semperian.co.uk; or
- by post FAO Semperian GDPR Team, Ninth Floor, One Redcliff Street, Bristol BS1 6NP

Complaints do not need to refer to specific legislation or use formal language; however, the complainant should ensure that the relevant facts and circumstances are included to enable us to fully review the Complaint.

The Complaint will be logged internally and given a reference number to ensure we are able to monitor the Complaint effectively.

4. Acknowledgement

We will acknowledge receipt of a Complaint within 30 days of receiving it.

5. Investigation and Response

During the course of the investigation we will:

- take appropriate steps to investigate the Complaint without undue delay;
- make any necessary enquiries such as clarificatory queries if we need further information from the complainant; and
- keep the complainant reasonably informed of progress where appropriate.

Once the investigation is complete, we will inform the complainant of the outcome (including any actions taken or proposed to address the issue) without undue delay, and in any event within 3 months (subject to exceptions).

In exceptional circumstances, such as where a Complaint is unusually complex or depends on information from third parties, we may take longer than 3 months to reach an outcome. If this occurs, we will explain the reason for the delay, keep the complainant informed, and provide an expected timeframe for our response before the expiry of the initial 3-month timeframe.

6. Outcome and Escalation

Upon issuing the outcome, Semperian will mark the complaint as closed. If the complainant is dissatisfied with the outcome, they may raise the matter with the ICO. This right will be clearly communicated in the outcome of the Complaint along with details on how to raise a Complaint with the ICO. The ICO will generally expect individuals to have completed our internal complaints process first before it considers a complaint from a data subject.

7. Record-Keeping

Semperian will maintain appropriate records of Complaints and outcomes in line with our accountability obligations under Data Protection Law.

8. Interaction with Other Policies

In addition to being available as a stand-alone policy on the Semperian website (www.semperian.co.uk), this policy is also signposted via our privacy notices.