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Data Protection Complaints Procedure

1. Purpose

This procedure sets out how Platform4 will receive, manage, investigate and respond to complaints relating to the processing of personal data, in accordance with the Data (Use and Access) Act 2025 and applicable UK data protection legislation.

The process ensures that complaints are handled **promptly, transparently and consistently**, and that individuals are given a clear route to raise concerns.

2. Scope

This procedure applies to:

- All complaints relating to the handling, use, storage or sharing of personal data;
- All individuals whose personal data is processed by the organisation (including employees, customers, suppliers and third parties);
- All staff, contractors and agents of the organisation.

A “data protection complaint” includes **any expression of dissatisfaction** regarding how personal data has been processed.

3. Key Principles

The organisation will:

- Provide **accessible and clearly signposted complaint channels**
- Acknowledge complaints within statutory timeframes
- Investigate complaints fairly and proportionately
- Keep complainants informed of progress
- Communicate outcomes clearly and without undue delay
- Maintain appropriate records to demonstrate compliance

4. How Complaints Can Be Made

Individuals may submit a data protection complaint via:

- Email to: info@platform4.com
- Online form: platform4.com/contact-us
- Post: 20 Cranbourn Street, London, WC2H 7AA
- Telephone: 020 7391 4300
- In person or via any member of staff

The organisation will **accept complaints via any channel**, including informal routes such as social media or direct contact with staff.

5. Complaint Handling Process

Step 1 – Receipt and Logging

- All complaints must be recorded in the **Data Protection Complaints Register** upon receipt.
- The record must include:
 - Date received
 - Complainant details
 - Nature of the complaint
 - Responsible officer assigned

Step 2 – Acknowledgement (within 30 days)

- The organisation will acknowledge receipt of the complaint within **30 days**.
- The acknowledgement will:
 - Confirm receipt
 - Provide a point of contact
 - Outline next steps and expected timelines

Step 3 – Assessment and Allocation

- The complaint will be reviewed and assigned to:
 - Data Protection Officer (DPO), or
 - Appropriate responsible manager/function
- Where necessary:
 - Identity verification will be undertaken
 - Clarification may be requested from the complainant

Step 4 – Investigation

The organisation will:

- Take **appropriate steps to investigate without undue delay**
- Gather relevant facts and documentation
- Consider:
 - Whether there has been a breach of UK GDPR or DPA 2018
 - Impact on the individual
 - Required remedial actions

The complainant will be kept informed where investigations are ongoing.

Step 5 – Response and Outcome

- The organisation will:
 - Provide a written response **without undue delay**
 - Clearly explain:
 - Findings
 - Any corrective action taken
 - Any reasons where no action is taken

Step 6 – Closure and Recording

- The complaint will be formally closed once:
 - A response has been issued, and
 - Any required actions have been completed
- Full documentation must be retained to demonstrate compliance.

6. Escalation and External Complaints

- Under the Data (Use and Access) Act, individuals are expected to **raise complaints with the organisation first** before approaching the ICO.
- If the complainant remains dissatisfied, they may escalate the complaint to the **Information Commissioner's Office (ICO)**.

The organisation will provide details of how to contact the ICO in its response.

7. Timescales

- Acknowledgement: **within 30 days**
- Investigation/response: **without undue delay** (dependent on complexity)

8. Roles and Responsibilities

- **Board / Senior Management**
 - Ensure appropriate governance and oversight

- **Data Protection Officer (DPO)**
 - Oversee compliance
 - Provide expert advice
 - Review complex or high-risk complaints
- **All Staff**
 - Recognise and escalate complaints promptly
 - Cooperate with investigations

9. Record Keeping and Audit Trail

The organisation will maintain:

- A complaints register
- Evidence of:
 - Acknowledgements
 - Investigations
 - Decisions and outcomes

This is essential to demonstrate compliance with statutory obligations.

10. Publication and Accessibility

- This procedure will be:
 - Referenced in the Privacy Notice
 - Available on the organisation's website
 - Written in clear, accessible language

11. Review

This procedure will be reviewed:

- Annually, or
- Following significant regulatory or organisational change