

# TLT Policy

Data Protection Complaints

VERSION 1.0

31 January 2024

Final – Confidential



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**Document version control**

<b>Version number</b>	<b>Date amended/created</b>	<b>Amended/created by</b>	<b>Details</b>
1.0	31 January 2024	Neil Smith	New Policy to outline TLT approach to Data Protection complaints. Content from GDPR Complaints Procedure retired.

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# 1 Definitions

<b>Data Protection Laws</b>	any data protection laws in force from time to time in the UK, including, but not limited to the UK-GDPR and Data Protection Act 2018
<b>Data Subject</b>	an identified or identifiable living individual to whom personal data relates
<b>DPA</b>	Data Protection Act 2018
<b>DPO</b>	Data Protection Officer
<b>Personal Data</b>	any information relating to a Data Subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person
<b>Personal Data Security Breach</b>	a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data
<b>Process/Processing</b>	any operation or set of operations performed on Personal Data, (whether or not by automated means, such as collection, consultation, destroying, disclosing, erasing, organisation, recording, retrieving, storage, structuring, alteration, retrieval, use, disclosure, dissemination, restriction, erasure or destruction)
<b>UK GDPR</b>	UK General Data Protection Regulation

## 2 Policy statement

TLT LLP (TLT) takes its legal obligations under the UK General Data Protection Regulation (UK-GDPR) and Data Protection Act 2018 (DPA) very seriously. We are committed to providing a professional and effective service to our clients, customers or other third parties who may be affected by our data processing activities and strive to investigate complaints in a prompt and effective manner and in accordance with Data Protection Laws.

## 3 Purpose

This policy sets out how individuals may raise a data protection complaint and how we deal with and respond to these.

## 4 Aims

4.1 TLT aim to address all data protection complaints and concerns quickly and informally in the first instance. This Policy aims to:

- 4.1.1 Make the complaints procedure easy and accessible
- 4.1.2 Deal with complaints and concerns expeditiously and courteously

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- 4.1.3 Advise how we will keep individuals informed
- 4.1.4 To provide a clear and timely response to concerns.

## 5 Scope

- 5.1 This Policy applies to complaints relating to how we have handled individuals' Personal Data or data rights. This may include (but not limited to):
  - 5.1.1 Occasions where a Data Subject feels their Personal Data is not being Processed in line with our Privacy Notice(s) or other information or Data Protection Laws
  - 5.1.2 Occasions where a Data Subject has adversely affected by a Personal Data Security Breach, caused by or involving TLT
  - 5.1.3 Occasions where a Data Subject feels we have not dealt with a request to exercise their Data Subject Rights correctly
  - 5.1.4 Occasions where a Data Subject feels we have not provided a timely response to a previously submitted Data Protection query or concern.
- 5.2 This Policy does **not** cover general service complaints where they are not related directly to Data Protection matters.

## 6 How to make a complaint

- 6.1 Individuals can make a complaint to us by:
  - 6.1.1 Writing to our DPO: 1 Redcliff St Redcliffe Bristol BS1 6TP
  - 6.1.2 Emailing us: [GDPR@tl.com](mailto:GDPR@tl.com)
  - 6.1.3 Completing our online form.

## 7 Timescales

We will aim to acknowledge all concerns within five working days of receipt and will respond to all concerns within one calendar month. There may be some occasions where we need additional time to respond to a concern, for example, where it is complex. If this is the case, we will let the individual know in a timely manner.

## 8 Escalation to the Information Commissioner's Office

- 8.1 We are committed to dealing with all data protection complaints in a timely and courteous manner. However, we understand that there may be occasions where individuals are unhappy with the outcome. Individuals have the right to complain directly to the UK's Privacy Regulator, the Information Commissioner's Office. This can be done by:
  - 8.1.1 Writing to them: ICO, Wycliffe House Water Lane Wilmslow Cheshire SKP 5AF
  - 8.1.2 Telephone: 0303 123 1113
  - 8.1.3 Via the web: [www.ico.org.uk](http://www.ico.org.uk)

## 9 Policy review

We will keep this Policy under regular review. This version was last updated on 10 January 2024.

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