

# Data Protection Complaints Procedure

## 1. Purpose & Scope

In accordance with requirements set out in the Data (Use and Access) Act (DUAA) 2025, this procedure outlines how Hayward Moon addresses complaints concerning how personal data is handled.

It applies to all data subjects whose personal data is processed by the Company.

Information regarding an individual's right to make a data protection complaint is also included within the Company's Privacy Notice.

Examples of grounds for a data protection complaint are (this list is not exhaustive):

- How personal data has been collected.
- Security measures used to store personal data.
- The way a subject access request (SAR) has been managed or responded to.

This procedure applies only to complaints concerning the handling of personal data and data protection rights. Complaints relating to legal services, conveyancing transactions, fees, delays or professional conduct should be raised under the Company's Complaints Procedure.

## 2. How to Submit a Complaint

Individuals can submit a data protection complaint through the following channels:

- **Email:** [gdpr@haywardmoon.co.uk](mailto:gdpr@haywardmoon.co.uk)
- **Post:** Data Protection Team, Hayward Moon, Connexions, 159 Princes Street, Ipswich, Suffolk, IP1 1QJ
- Telephone: 01473 295803
- In person
- Any other reasonable communication channel

### To help us investigate

Before investigation can commence, the complainant must provide the following information:

- Full name and contact information.
- We may request reasonable evidence of identity where necessary to verify the identity of the complainant or where the complaint concerns personal data that could be disclosed during the investigation.
- Confirmation that you are the complainant; if you are making a complaint on behalf of another individual, we may ask for written authority from them and reasonable evidence of identity before discussing or disclosing their personal data.
- A clear description of the issue or the incident date.
- Any reference numbers related to previous correspondence (e.g., a previous Subject Access Request).

### 3. Procedure Stages

#### Stage 1: Acknowledgment

- Upon receiving a complaint, the Data Protection Team will acknowledge receipt of the complaint as soon as reasonably practicable and in any event **within 30 calendar days** of receipt.
- If the complaint is unclear, the Data Protection Team may contact the complainant to clarify the scope of the investigation.

#### Stage 2: Investigation

- The Data Protection Team (including the Data Protection Manager (“DPM”)) will investigate the matter impartially.
- The investigation will review how the personal data was processed, whether internal policies were followed, and if a data breach occurred.
- The Data Protection Team will communicate with the complainant throughout if delays are expected.

#### Stage 3: Response

- We aim to provide a substantive response within 30 calendar days of acknowledgement, subject to being in receipt of the information we need to commence the investigation at that point (as described above). Where 30 calendar days is not possible due to the complexity of the complaint, we will keep the complainant informed of progress and expected timescales.
- If the complaint is upheld, the response will outline the actions taken to resolve the issue and prevent future occurrences.
- If the complaint is rejected, clear reasons will be provided as to how we complied with data protection law.

### 4. External Escalation

If the complainant remains unsatisfied with the internal outcome, they hold the statutory right to escalate their concerns to the relevant supervisory authority. In the UK, this is the [Information Commissioner's Office \(ICO\)](#).

Individuals have the right to complain to the ICO at any time. However, the ICO will generally expect individuals to have first raised their concerns directly with the organisation where appropriate..

#### How the ICO deals with data protection complaints

Complaints can be made to the ICO at any point.

Hayward Moon is not obliged to tell the ICO of a complaint being made to them; the ICO will contact us if they need more information from us.

In most cases, if a complaint is made directly to the ICO regarding how personal information has been handled, they will ask the complainant to raise a complaint with us first.

### 5. Complaint Records

The Company will maintain a register of all data protection complaints received, including:

- Date received.
- Nature of complaint.
- Investigation steps taken.
- Outcome.
- Date closed.