



Integrated Management System Data Use and Access Complaints Procedure

Purpose and Scope

This procedure establishes a clear process for individuals to raise concerns or complaints regarding the Fraikin's handling of personal data.

Fraikin is committed to protecting personal information and investigating complaints fairly, promptly, and transparently in accordance with the UK GDPR, Data Protection Act 2018 and the Data (Use and Access) Act 2025.

The complaints handling requirements under the Data (Use and Access) Act 2025 come into force on 19 June 2026. Fraikin will maintain and operate a data protection complaints process from that date and will apply this procedure as good practice before commencement where appropriate.

Scope

This procedure applies to:

- Employees
- Former employees
- Job applicants
- Customers
- Suppliers
- Visitors
- Members of the public

Any individual whose personal data is processed by the organisation.

This procedure applies to all data protection complaints received by Fraikin. There are no exemptions from the requirement to have a process for handling data protection complaints.

Types of Complaint

Complaints may relate to:

- Unauthorised disclosure of personal data
- Accuracy of personal data
- Failure to respond to a data subject rights request
- Excessive retention of personal data
- Unlawful processing
- Marketing communications
- CCTV usage
- Data sharing with third parties
- Information security concerns
- Any perceived breach of data protection legislation

How to Make a Complaint

Complaints may be submitted:

By Email:

Gbr-dataprotection@fraikin.com

By Post

Data Protection Lead
Fraikin Limited
2M, 1st Floor Middlemarch Business Park
Siskin Drive
Coventry
CV3 4FJ



In Writing:

Any written communication clearly expressing a data protection concern will be treated as a complaint.

Fraikin will take reasonable steps to facilitate complaints and will recognise, and handle data protection complaints made through any reasonable channel, including telephone, in person, social media, or direct contact with employees, even where the complaint is not submitted through the preferred route.

Individuals do not need to use specific legal terminology or refer to data protection legislation for their concern to be treated as a complaint.

Information Required

Where possible, complainants should provide:

- Full name
- Contact details
- Description of the concern
- Relevant dates
- Copies of supporting evidence
- Details of the outcome sought

Failure to provide all information will not prevent a complaint being investigated. Where necessary, Fraikin may request further information to understand, verify, or progress the complaint, including confirming identity or authority where a complaint is made on behalf of another individual.

Fraikin will acknowledge receipt of all data protection complaints promptly and no later than 5 working days from receipt.

Following acknowledgement, complaints will be investigated without undue delay, and the complainant will be kept informed of progress at appropriate intervals where the investigation is ongoing.

Fraikin will provide a substantive written outcome within 30 calendar days of receipt of the complaint. Where a full response cannot be provided within this timeframe due to the complexity of the matter, Fraikin will inform the complainant of the delay, explain the reasons, and provide a revised response timeframe.

Complaint Handling Process

Stage 1 – Receipt and Acknowledgement

- Complaints may be received through any reasonable channel.
- Fraikin will acknowledge receipt in line with the timeframes set out above.
- A complaint reference will be assigned and recorded in the Complaints Register.

Stage 2 – Initial Assessment

- The Data Protection Lead will assess the complaint and determine scope.
- Any immediate risks or required actions will be identified.

Stage 3 – Investigation

- Investigations will be conducted without undue delay and in line with the response timeframes above.
- Relevant records, personnel, and systems will be reviewed.
- The complainant will be kept informed of progress where appropriate.

Stage 4 – Outcome

- Fraikin will issue a response in accordance with the timeframe set out above.
- The response will:
 - Summarise findings
 - Confirm whether the complaint is upheld, partially upheld or not upheld
 - Explain the reasons for the decision
 - Detail any corrective actions
- The response will also include ICO escalation rights.

Corrective Actions

Where shortcomings are identified, actions may include:

- Data correction
- Process improvement
- Additional staff training
- Policy updates
- Security improvements
- Disciplinary action where appropriate
- Reporting to the ICO where required

Escalation

If the complainant remains dissatisfied after Fraikin has responded, they have the right to complain to:

Information Commissioner's Office (ICO)

Fraikin encourages individuals to allow it the opportunity to investigate and resolve concerns, but this does not restrict an individual's right to contact the ICO.

Informing Individuals

Fraikin will inform individuals of their right to make a data protection complaint to Fraikin and to the ICO at the point where personal data is collected, including through relevant privacy notices. Fraikin will also include appropriate complaint and escalation information when responding to data subject rights requests.

Record Keeping

Fraikin will maintain a Data Protection Complaints Register recording:

- Complaint reference
- Date received
- Complainant name
- Nature of complaint
- Investigation outcome
- Actions taken
- Closure date



Records will be retained in accordance with the Fraikin's retention schedule.

Complaint records will be maintained sufficiently to evidence of receipt, acknowledgement, investigation steps, progress updates, outcome, corrective actions, and closure.

Confidentiality

Complaints will be handled confidentially, and information will only be shared with those who require access for investigation and resolution purposes.

Monitoring and Review

The Data Protection Lead will review complaint trends periodically to:

- Identify recurring issues
- Monitor response times
- Assess effectiveness of controls
- Recommend improvements

Summary complaint statistics may be reported to senior management as part of governance and compliance reporting.

Relevant employees will receive guidance or training to help them recognise data protection complaints and escalate them promptly to the Data Protection Lead or appropriate team.

Date	Revision	Brief Description of Change
10.06.26	1	New Policy
11.06.26	2	Updated to align with Data (Use and Access) Act 2025 complaints handling requirements and ICO guidance.

Document Control			
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