Data Protection Complaints Handling Policy

1 Introduction

1.1 The UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act ("DPA 2018"), and the Data (Use and Access) Act 2025 ("DUA 2025") (together, the "Data Protection Legislation"), give data subjects, and applicable third parties, rights in relation to personal data. This policy details how Howes Percival LLP will respond to complaints from data subjects and third parties relating to the use of personal data ("Data Complaints").

1.2 All Data Complaints made to us will be dealt with promptly, fairly and without charge.

1.3 We maintain records of all Data Complaints and outcomes in accordance with our accountability obligations under the Data Protection Legislation.

1.4 This policy does not cover complaints unrelated to complaints about the handling of your personal data. Although, we are strongly committed to providing a high-quality legal service to all our clients, if at any time you are not happy with the service we have provided generally, or our charges, our policy and procedure for dealing with that complaint is detailed in our Complaints Handling Policy, which can be provided to you upon request.

2 What is a Data Complaint?

2.1 We provide information about how we look after, collect, use and process your personal data in the relevant Privacy Notice, a of copy of which can be found at: https://www.howespercival.com/privacy-policy/ or, where you are an employee, worker, contractor or partner, on our intranet.

2.2 If you believe we have infringed any Data Protection Legislation because of the way your personal data has been handled, you are entitled to make a Data Complaint.

2.3 A Data Complaint may cover, but is not be limited to, the following:

2.3.1 Data breaches;
2.3.2 Our response to a subject access request (SAR);
2.3.3 The handling of your personal data, including (but not limited to):
2.3.3.1 the storage and security of your personal data:

2.3.3.2 the retention of your personal data; and

2.3.3.3 the accuracy of your personal data held.

2.4 If you are unsure whether your complaint qualifies as a Data Complaint, please contact our Data Protection Officer, Hannah Steggles (dpo@howespercival.com) for clarification.

3 How do I make a Data Complaint?

3.1 You can make a Data Complaint in writing to our Data Protection Officer, Hannah Steggles, at Howes Percival LLP, 3 The Osiers Business Centre, Leicester, LE19 1DX or by email to dpo@howespercival.com.

3.2 You may also complete the Data Complaint Form, annexed to this policy and address to us as outlined in paragraph 3.1.

3.3 If you do not complete the Data Complaint Form and the initial information provided in your submitted Data Complaint is insufficient to allow us to properly investigate and respond to you, we may ask you to provide additional information before we are able to formally respond. If this is the case, we will notify you within 30 days of receipt of your Data Complaint.

3.4 It may be necessary for us to verify your identity in order to respond to your Data Complaint. We would usually require photographic evidence of your identity and evidence of your current living address in order to process your Data Complaint. We will clarify with you where more information is needed, on a case-by-case basis.

3.5 If you are making the Data Complaint on behalf of another person, we will require you to provide evidence of your authority to act on their behalf (i.e. a power of attorney or a signed letter of authority).

4 What will happen next?

4.1 Once we have received your Data Complaint, the Data Protection Officer will nominate a data protection specialist to review the complaint, we will tell you who that person is when we acknowledge receipt of your Data Complaint and will provide a copy of this policy. We will do this as soon as possible and in any event, within 30 days of receipt of your Data Complaint.

4.2 Depending on the information provided in your Data Complaint, we may need to ask you for further information, before we are able to begin fully investigating your Data Complaint.

4.3 Once we have obtained all necessary information to enable us to investigate your Data Complaint, we will usually within 30 days and, in any event, without undue delay, take appropriate steps to formally respond.

4.4 If the Data Complaint is particularly complex, we will keep you informed and updated on the progress of our investigation.

4.5 In our formal response to your Data Complaint, we will explain the outcome of our investigation and any resulting necessary action we have identified to be taken.

5 What happens if you are still unsatisfied?

5.1 If following our response, you are still not satisfied, in the first instance, you may ask for that response to be reviewed by our Data Protection Officer.

5.2 If you remain unsatisfied following that review, or at any time, you have the right to make a complaint to the Information Commissioner's Office (the "ICO"), the UK supervisory authority for data protection issues. Information about how to make a complaint to the ICO can be found here: https://ico.org.uk/make-a-complaint/. The ICO recommend that before reporting your concern to them, the organisation subject to the complaint be allowed an opportunity to address and respond to the complaint.

Change History Record

Version	Revision Description	Date Revised
1.0	Initial Issue	27/05/2026

DATA PROTECTION COMPLAINTS FORM ("Data Complaint")

This form can be used to make a Data Complaints. A Data Complaint can be made to us, if you believe we have infringed any Data Protection Legislation because of the way your personal data has been handled.

More information about our policy in relation to Data Complaints and how we will respond to you can be found in full here.

1. Your Details

Full Name	
Address	
Email	
Telephone Number	

2. Are you acting on behalf of someone else?

☐ Yes ☐ No

If yes, please provide their details and attach a signed authority to act:

3. Are you (or the person identified at paragraph 2) an existing or former client of Howes Percival LLP?

☐ Yes ☐ No

If yes, please provide details of your client care partner or main contact with us.

4. Nature of Your Data Complaint

Please give a short summary of the nature of your Data Complaint. This helps us quickly understand what the problem is.

5. Personal Data Involved

Please describe the type of personal data involved (e.g. contact details, financial information, health data):

6. Please give a timeline of key events related to your Data Complaint (Optional)

7. Previous Contact

Have you previously raised this issue with us?
☐ Yes ☐ No

If yes, please provide details:

8. Supporting Documents

Please list and attach any supporting documentation related to your Data Complaint:

9. What would you like to happen as a result of your Data Complaint? (Optional)

10. Please let us know anything else you think is relevant to your Data Complaint (Optional)

Signature: _____

Date: _____

Please send this form to:

Hannah Steggles, Data Protection Officer,
By email to:dpo@howespercival.com ; or
By post to: Howes Percival LLP, 3 The Osiers Business Centre, Leicester, LE19 1DX