

Appendix to the Karbon Homes Group Complaints, Compliments and Suggestions Policy

COMPLAINTS ABOUT HOW WE HANDLE PERSONAL DATA

1. Appendix Purpose

1.1. Under the Data (Use and Access) Act 2025, individuals have the right to complain about how we collect, use, store, share, or otherwise handle their personal data.

1.2. The following explains how such complaints will be managed differently.

2. What is a Personal Data Complaint?

2.1. Your personal data is data that relates to you as an individual, that you can be directly or indirectly identified by. This can be as simple as your name or address. It also includes more sensitive personal data such as your ethnic origin, health conditions or political opinions, for example.

2.2. You will be making a personal data complaint, if you are:

- Either making a complaint about your own **personal data**, or acting as an authorised representative for someone else complaining about their personal data
- Making a complaint that personal data is incorrect, incomplete, unclear, lost, misused, or shared inappropriately. Examples of this could be:
 - You believe that data we have recorded about you is incorrect
 - You believe there has been a data breach of your personal data, (e.g. you think we have sent out a letter meant for you to another customer)
 - You have previously made a Subject Access Request (SAR) and don't believe we have shared the personal data we hold.
- If you are dissatisfied with the way your personal data has been handled, rather than with the service provided.

2.3. If the answer to any of the above questions is **yes**, the complaint will be managed as a personal data complaint.

2.4. If you make a complaint which includes a personal data complaint as well as other issues, the personal data element of your complaint will be handled

separately to the other issues raised, under our separate personal data complaint procedure.

3. Responding to a Complaint

- 3.1. When you make a data protection complaint to us, we will acknowledge receipt of the complaint within 30 calendar days at the latest.
- 3.2. If you are an authorised representative, we will check that you are authorised to speak on the individual's behalf.
- 3.3. We will gather the information we need to understand what has led to the complaint being made. This may include looking at all the relevant facts, speaking to relevant members of staff, comparing the information in your complaint with any information we hold, and checking we've followed our own policies and standards. We may need to ask you for more information as part of this process. We will begin this investigative process without due delay when we receive your complaint.
- 3.4. We will then write to you, letting you know the outcome of your complaint. Where we believe we have complied with our personal data protection obligations, we will explain this clearly to you, including the reasons for our decision.

4. Extending the Response Timeframe

- 4.1. In some circumstances, we may extend the response timeframe by up to a further two months while we complete our investigations. This may apply where:
 - the complaint is particularly complex;
 - the matter is large in scale or scope;
 - information is required from unavailable colleagues or third parties; or
 - the investigation depends on retrieving information from back-up systems.
- 4.2. Where an extension is required, we will keep you informed of this and provide you with the reasons for the delay.

5. Record Keeping

- 5.1. We will keep records of the date we received your personal data complaint, the acknowledgement letter we send you, relevant conversations and documents, the outcome of your complaint and any actions we take as a result of our investigation into your complaint.

6. Escalation

6.1. If you are dissatisfied with our response, you may contact the Information Commissioner's Office (ICO):

- Online: <https://ico.org.uk/make-a-complaint/>
- Telephone: 0303 123 1113
- Post:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Responsible Officer	Senior Data Protection Business Partner
This appendix is applicable to	Karbon Group
Version	1
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Date of next review	With Complaints, Compliments and Suggestions Policy