Data Handling Complaints Process

CourtCorrect Ltd.

Document Name	Data Handling Complaints Process
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Policy Owner	Head of Legal and Compliance
Classification	Public — available to interested parties on request
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1. Purpose

This process explains how individuals can complain to CourtCorrect Ltd. about the way their personal data is collected, used, or protected, and how CourtCorrect handles such complaints. It supports the UK GDPR and the Data Protection Act 2018, reflects the complaints provisions introduced by the Data (Use and Access) Act 2025 (which require controllers to facilitate the making of data protection complaints), and addresses the June 2026 internal audit.

2. Scope

This process covers complaints from any individual (employees, candidates, clients' staff, consumers, and other data subjects) about CourtCorrect's handling of their personal data. It does not replace the DSAR Procedure (for data subject rights requests) or the Incident Management Policy (for personal data breaches); complaints that reveal a rights request or a breach are routed into those processes in parallel.

3. How to Make a Complaint

- Email: hello@courtcorrect.com, marked for the attention of the Data Protection Officer.
- Post: Data Protection Officer, CourtCorrect Ltd., 33 Percy Street, London W1T 2DF.
- No fee is charged, and no special form is required. Complainants should describe the concern and how they can be contacted.

4. Process and Timescales

Step	Action	Timescale	Responsible
1. Receipt	Complaint logged in the Data Handling Complaints Log with a unique reference.	On receipt	DPO
2. Acknowledgement	Written acknowledgement sent to the complainant with the reference and expected response time.	Within 5 working days	DPO
3. Triage	Assess whether the matter is (a) a complaint, (b) a data subject rights request (route to DSAR	Within 5 working days	DPO

Step	Action	Timescale	Responsible
	Procedure), (c) a potential personal data breach (route to Incident Management Policy), or (d) a matter for a client acting as Controller (see Section 5).		
4. Investigation	Investigate the complaint, gathering records and speaking to relevant personnel.	Proportionate to complexity	DPO
5. Response	Substantive written response setting out findings, any remedial action, and the right to escalate.	Within 30 calendar days of receipt (extendable for complex cases, with the complainant informed of the reason and revised date)	DPO
6. Close-out	Outcome recorded in the Complaints Log; systemic issues raised as corrective actions in the 09-ISMS tracker.	On completion	DPO

5. Where CourtCorrect Acts as Processor

Where a complaint concerns Case Data or end-user data processed on behalf of a client (CourtCorrect acting as Processor), the DPO notifies the relevant client without undue delay, provides reasonable assistance, and informs the complainant that the client, as Controller, is responsible for the substantive response.

6. Right to Complain to the ICO

Complainants have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection (www.ico.org.uk). CourtCorrect is registered with the ICO under registration number ZB564422. We would appreciate the opportunity to address concerns first, but this does not affect the right to approach the ICO directly.

7. Records and Review

- All complaints are recorded in the Data Handling Complaints Log (reference, date, complainant, summary, route taken, response date, outcome, remedial action).
- Complaint volumes, themes, and outcomes are reported to the ISMS Management Board and form an input to the annual Management Review (08-ISMS).
- This process is reviewed at least annually by the DPO.

ISO/IEC 27001:2022 Coverage

Clause / Control	Requirement	Application in this document
A 5.34	Privacy and protection of PII	Provides a documented route for data subjects to raise concerns and obtain redress.
Clause 4.2	Needs of interested parties	Addresses the expectations of data subjects and the ICO

Clause / Control	Requirement	Application in this document
		regarding complaint handling.
A 5.31	Legal and regulatory requirements	Implements UK GDPR / DPA 2018 transparency duties and the Data (Use and Access) Act 2025 complaints provisions.

Version History

Version	Date	Description	Prepared by	Approved by
1.0	08/07/2026	Initial issue. Created to close the complaints-process element of the June 2026 internal audit finding.	Angelica Naiko (Head of Legal and Compliance)	ISMS Management Board