

PPL Group Data Protection Complaints Policy

A) Introduction

- 1) We have legal complaint handling obligations under UK data protection law. You have the right to complain directly to us if you consider that we have breached data protection laws because of the way we have handled your personal data (or the personal data of someone you are acting on behalf of). This Policy explains your right to complain and how we will handle your complaint. It applies to all employees, workers, contractors and third parties acting on our behalf.
- 2) This Policy is effective from 3rd September 2026 and the next review will be due on 3rd September 2027.

B) Roles and responsibilities

- 1) Our Data Protection Officer (DPO) is responsible for handling data protection complaints within our organisation. They will work alongside other members of our organisation who have been identified as relevant to the investigation of each complaint. Any questions about this Policy should be directed to our DPO.
- 2) We are committed to handling data protection complaints in line with our legal obligations and in an accessible, fair, transparent and timely manner. We will handle complaints confidentially and only share information where appropriate to investigate and resolve the complaint, as required or authorised by law or otherwise in accordance with our privacy notices. We will aim to avoid conflicts of interest.

C) Types of complaint

- 1) Examples of a data protection complaint include (but are not limited to) the following:
 - the way we have responded to a subject access request (SAR), or other data rights request (see our separate 'policy on your rights in relation to your data' for information on individual data rights)
 - the security measures we have used to store your information (e.g. where you have been impacted by a data breach); or
 - how we have collected or used your personal information (e.g. where we have stored it, how long we have kept it for, or its accuracy).

This list is not exhaustive. You have the right to complain to us at any time if you consider that there has been an infringement of any of your rights in relation to your personal data. Information on how we handle your personal data is set out in our separate privacy notices available on the PPL Group website (www.parking-partners.co.uk) and on request.

- 2) Complaints about other matters that do not relate to data protection, such as customer service issues, will not be treated as a data protection complaint. If you have a complaint that is not about data protection, please contact enquiry@parking-partners.co.uk. Some complaints will include both data protection and non-data protection issues. We will handle the data protection aspects under this Policy and other policies may apply depending upon the nature of your complaint. We will let you know if you need to make your complaint in a different way or if we will handle it under a different policy.
- 3) If we are not sure whether you are making a data protection complaint, we will contact you to clarify the nature of your complaint.

D) How to make a data protection complaint to us

1) You can submit a complaint directly to us using any of the following methods:

- PPL Group Data Protection Complaint Form [here](#)
- Online form: www.parking-partners.co.uk/contact
- Email: enquiry@parking-partners.co.uk
- Post: Audley House, Palace Street, Victoria, London, SW1E 5HX
- Telephone: 0203 627 1994

This is not an exhaustive list. We will take appropriate steps to respond to data protection complaints that we receive from any other channels.

2) We are committed to making this complaint process accessible to everyone. If you need this policy in large print, audio format, braille, Easy Read or another language, or if you need support to complete it, please let us know when making your complaint.

E) Complaints made on social media

1) Although data protection complaints may be made on social media, we will ask you to continue the complaint through one of the more secure methods set out above to protect your data.

F) Complaints from children

Our services and websites are not intended for children, and we do not knowingly collect data relating to children. However, if you are a child or vulnerable adult, we may contact you upon receipt of your complaint to offer additional help and information. Where relevant, we will respond to data protection complaints from, or on behalf of, children or other vulnerable individuals, in plain, clear language they can understand at all stages of the complaints process. We will comply with our obligations to assess the competence of the child to understand and exercise their rights.

G) Responding to your complaint

- 1) When we receive a data protection complaint, we will acknowledge receipt no later than 30 days from receiving it.
- 2) If we have any doubts about your identity, we may need to ask you for proof of ID before we respond to your complaint. We will only ask for information that is reasonably necessary to verify your identity if we do not already have sufficient information.
- 3) Complaints made on your behalf by a third party must be accompanied by evidence (such as a power of attorney or signed letter of authority) that the third party is authorised to act on your behalf. If this is not provided, we will contact the third party to ask that such evidence is provided before we respond to your complaint. If we are unsure whether a letter of authority is valid, we will contact you about this before we respond to your complaint.
- 4) We will take appropriate steps to respond to your complaint without undue delay, including making enquiries into the complaint and keeping you informed about the progress of our investigation and timescales for the next update or outcome.
- 5) Some complaints may be easy to resolve; others may require further investigation. In this circumstance, we may need to contact you to request further information to assist with our investigation, including to clarify the scope of the complaint. It may take us longer to investigate and resolve complaints which are complex, serious or which relate to multiple

data protection issues. We will only request information that is reasonable and proportionate in the circumstances and will not request more information than we require.

- 6) Following our investigation, we will inform you of the outcome of your complaint without undue delay, explaining our findings, whether the complaint is upheld (in whole or in part), any action taken or proposed, and, where no action is taken, the reasons for that decision.
- 7) We have processes in place for reviewing and escalating complaints where you are unsatisfied with our complaint handling as we progress the complaint or the outcome.
- 8) If you object to our handling of your complaint or disputes the outcome or any aspect of our response and notify us, we will escalate the matter to the Data Protection Officer. They will review the matter and respond to the individual with their decision on our complaint handling, whether to accept the original finding or to substitute a new finding or alternatively escalate the complaint to an appropriate reviewer.
- 9) Where reasonably practicable, any internal review will be carried out by a person who was not primarily responsible for the original response.
- 10) The Data Protection Officer will respond to you within 10 working days of the referral to the Data Protection Officer. If the complaint is upheld, the Data Protection Officer will ensure that necessary steps are taken as a result, such as correction, deletion, apology, security remediation, or process changes. Once the matter has been escalated to the Data Protection Officer and a decision issued, this decision is final. No further action will be taken, and the complainant will be informed of this.
- 11) If you are dissatisfied with our response, you have the right to make a data protection complaint to the Information Commissioner's Office (ICO) (ico.org.uk). You also have the right to complain to the ICO at any time and to lodge a claim before a competent court, irrespective of whether you have lodged a complaint with us using our complaints process. Please be aware, however, that the ICO may ask you to contact us about your complaint first.

H) Complaints about data processors

- 1) Where we receive a complaint that relates to the processing of personal information by our service providers, we will ask them to provide us with information relevant to the complaint without undue delay and in line with our contractual terms with the service provider.
- 2) Where a service provider receives a complaint about the processing of our personal data whether by them or us, they are asked to forward this to us without undue delay. Service providers are under no obligation to handle complaints on our behalf unless this has been agreed between us and the relevant service provider(s) under a binding contract. Where applicable, we will ask service providers to handle such complaints in line with our policies and procedures.
- 3) Where a complaint relates to joint arrangements we have with partners, we may choose to agree separate complaint handling procedures as part of those arrangements. Employees handling such complaints will be given adequate training and supporting resources to manage these effectively.

I) Training

We will provide training for all staff on recognising a data protection complaint and what to do if they receive one, including where to direct a complaint within our organisation.

J) Record keeping

- 1) We will keep a record of:
 - the date we receive the data protection complaint
 - our acknowledgement
 - any relevant conversations and documents
 - the outcome of the complaint; and
 - any actions we take because of our investigation.
- 2) We will use these records to demonstrate compliance, for audit and monitoring purposes, training, to support consistent handling and to identify recurring issues, trends or areas for organisational improvements or remediation.
- 3) We will not retain personal data relating to complaints for longer than is necessary. More information on our retention periods is set out in our privacy notices available via the PPL Group website (www.parking-partners.co.uk) and on request.