

Data Protection Complaints Procedure

1. About this procedure

Kenneth Elliott and Rowe takes the protection of personal data seriously. If you believe we have handled your personal data in a way that does not comply with data protection law, you have a right to complain to us directly.

This right is set out in section 164A of the Data Protection Act 2018, introduced by the Data (Use and Access) Act 2025. It applies whether you are a client, a former client, an employee or former employee, a job applicant, a supplier, a party on the other side of a matter we are handling, or anyone else whose personal data we hold.

We will handle your complaint fairly, take it seriously, and tell you the outcome.

2. What this procedure covers — and what it does not

Use this procedure if you are concerned about how we have handled your personal data. For example:

- how we responded, or failed to respond, to a request for a copy of your data
- the security of your information, or a data breach affecting you
- how we obtained your data, or what we are using it for
- our refusal of a request to correct, erase or restrict your data
- marketing communications you did not want or asked us to stop

Please use a different route if:

Your concern	Where to go
The quality of legal service you received from us, our fees, or delays on your matter	Our separate Client Complaints Procedure, which meets our obligations under the SRA Standards and Regulations and carries a right of referral to the Legal Ombudsman. Contact Clare Stevens Clare.Stevens@ker.co.uk or see https://www.ker.co.uk/policies/ .
You want a copy of the personal data we hold about you	This is a subject access request, not a complaint. Contact mbs@ker.co.uk and we will handle it under Article 15 UK GDPR. If you are unhappy with how we handle it, you can then complain under this procedure.
You are concerned about the professional conduct of a solicitor	The Solicitors Regulation Authority — sra.org.uk

If you contact us using the wrong route, we will not turn you away. We will pass your concern to the right team internally and tell you we have done so.

3. How to make a data protection complaint

You can complain in any of the following ways. You do not have to use a particular form or particular wording.

- **Email:** mbs@ker.co.uk
- **Post:** Data Protection Officer, Mark Sadler, Kenneth Elliott and Rowe Limited Enterprise House 18 Eastern Road Romford RM1 3PJ
- **Telephone:** 01708 757575 — we will record the details and read them back to you
- **In person, or to any member of staff** — any of our people can take a data protection complaint and pass it on

If you need this procedure in another format — large print, easy read, audio, or another language — or if you need help making your complaint, tell us and we will arrange it at no cost to you.

4. What to tell us

It helps if you can give us:

1. your name and contact details
2. what has happened, and why you think it is wrong
3. roughly when it happened, and any reference number, matter number or names involved
4. what you would like us to do to put it right

If you cannot provide all of this, still get in touch. We will ask you for anything further we need.

5. Complaining on someone else's behalf

You can ask someone — a relative, a friend, a solicitor, or an advocacy organisation — to complain for you. We will ask for written authority before we discuss your personal data with them. If you are complaining on behalf of a child, or an adult who lacks capacity, tell us the basis on which you are acting and we will explain what we need.

We may need to confirm your identity before we can investigate, particularly where the complaint concerns sensitive information. We will ask for the minimum needed, and we will explain why.

6. What happens next

We acknowledge your complaint. The law requires us to acknowledge within 30 calendar days of receiving it. We aim to acknowledge within 10 working days. Our acknowledgement will confirm what we understand your complaint to be, tell you who is dealing with it, and give you a point of contact.

We investigate. The law requires us to take appropriate steps to respond without undue delay. That means we gather the relevant records, speak to the people involved, and consider whether we have met our obligations.

We tell you the outcome. We aim to give you a substantive response within 30 calendar days of acknowledging your complaint. If the matter is complex and we need longer, we will tell you before that

deadline, explain why, and give you a revised date. We will keep you updated at least every 20 working days until the matter is closed.

Our response will tell you:

- what we found
- whether we consider anything went wrong
- what we have done or will do about it, and by when
- how to take the matter further if you remain unhappy

7. If you are not satisfied

Ask us to look again. If you think we have missed something or got it wrong, reply to us within 20 working days and ask for a review. The review will be carried out by someone who was not involved in the original investigation, normally a Director of the firm. We will respond within 20 working days.

Complain to the Information Commissioner's Office. You have the right to complain to the ICO at any time. However, the ICO will usually expect you to have raised the matter with us first, and to have allowed us a reasonable period — normally around 45 days — to respond, before it will take your complaint forward. Keeping a copy of your complaint to us and of our response will help.

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline: 0303 123 1113

ico.org.uk/make-a-complaint

You may also have the right to seek a remedy through the courts. Nothing in this procedure affects that right, and using this procedure does not stop the clock on any legal deadline that applies to you.

8. Cost

Complaining to us under this procedure is free.

9. Confidentiality

We will use the information in your complaint only to investigate and respond to it, and to improve how we work. We will keep a record of your complaint and of our handling of it for 6 years. Our privacy notice at <https://www.ker.co.uk/policies/> explains more.