

# Story Homes Data Protection Complaint Handling Policy

## Purpose and scope

Every individual has rights in relation to how the information from which they can be identified (known as personal data) is handled. As a business, we collect, store, process and share personal data about our customers, our suppliers, our staff and other third parties.

Story Homes Limited (the **Company**) is committed to ensuring that it complies with the requirements of the Data Protection Act 2018 (the **Act**), the UK General Data Protection Regulation Assimilated Regulation (EU) (**GDPR**), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (**PECR**), and the Data (Use and Access) Act 2025 (**DUAA**) as amended from time to time (together the **Data Protection Legislation**) in relation to the processing of personal data.

The Company has legal complaints handling obligations under Data Protection Legislation. If an individual considers that we have breached Data Protection Legislation, they have the right to make a complaint directly to us, to the Information Commissioner's Office (**ICO**) or to pursue legal action.

This policy outlines our approach to handling data protection complaints. It should be read together with the Company's respective privacy policies and data protection procedures. It applies to all employees, workers, contractors and third parties acting on our behalf. It covers complaints from any data subject or their authorised representative.

## Roles and responsibilities

Our Data Privacy Manager (Tony Thompson – Group Finance Director) is responsible for coordinating how we handle data protection complaints. They will involve the relevant business, HR, IT, security, risk or compliance teams as needed.

## Complaints involving vulnerable individuals

Where we receive a complaint from, or on behalf of, a vulnerable individual, we will follow legal and Data Protection Legislation guidance and requirements to ensure our process is fair, transparent and accessible to the individuals concerned, having regard to age, understanding and any other relevant circumstances.

## Complaint channels

Individuals may submit a data protection complaint to us using any of the following options:

- By using the link on our website [www.storyhomes.co.uk/aftercare](http://www.storyhomes.co.uk/aftercare)
- By email to [dataprotection@storyhomes.co.uk](mailto:dataprotection@storyhomes.co.uk)
- By post to: Story Homes Limited, Story House, Lords Way, Kingmoor Business Park, Carlisle CA6 4SL (marked for the attention of the Data Privacy Manager)
- By telephone on 01228 404550
- In person where the Company offers in-person customer (site/sales) or staff (HR) support

To expedite the complaint, we will encourage individuals to use our established complaint channels. They may choose to submit a complaint through any of our complaint channels, and we will accept and direct complaints appropriately.

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Where a complaint is made through a social media or other unsecure public channel, we will ask the complainant to continue the complaint through our more secure established complaint channels to protect their data.

## Requesting additional information

Some complaints may be easy to resolve; others may require further investigation. Where reasonably necessary to investigate a complaint, we may ask the complainant for more information, including information to verify their identity or clarify the scope of the complaint. We will only request information that is reasonable and proportionate in the circumstances and will not request more information than we require to identify the complainant or their representative.

Where a complaint is made on behalf of another individual, we may require evidence such as a power of attorney or a signed letter of authority indicating that their representative is authorised to act on their behalf. We cannot process complaints unless adequate proof of authority is provided. Where this is the case, we will explain it to the person who submitted the complaint.

## Complaints to, or about, our service providers

Where a complaint received by us relates to the processing of personal data by our service providers, we will ask these providers to supply us with details and information relevant to the complaint without undue delay and in accordance with any agreed and specified terms within our contract with the service provider.

Where a service provider receives a complaint about the processing of our personal data whether by them or us, they should 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.

Where we process personal information, acting as a service provider on behalf of a controller, we will only handle complaints under arrangements agreed and specified within a binding contract between us and the controller(s). If the controller disappears, no longer exists or has become insolvent, we will handle complaints in line with this Policy and its associated procedures. Any such complaint should be sent to the Data Privacy Manager.

## Acknowledgement and timeframes

We must acknowledge receipt of a complaint within 30 days of receipt. However, we will aim to acknowledge receipt within five working days.

We will aim to:

- Request any further information including for identification or clarification purposes within 10 working days
- Provide updates at least every 30 days
- Reach an outcome within 60 working days

For ongoing investigations, we will communicate this to individuals with an indication of our initial anticipated timescales for resolving the complaint. We will continue to keep the complainant informed of

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our progress, including, where appropriate, the next steps, any further information required and any expected timeframe for the next update or outcome.

## Investigations

We will take such reasonable and proportionate steps as are necessary to investigate complaints fairly and in a timely manner.

We have processes in place to classify and escalate complaints that are time-sensitive, serious or sensitive in nature. It may take us longer to investigate and resolve complaints which are complex, serious or which relate to multiple data protection issues.

## Outcomes and escalation

We will communicate the outcome of the complaint to the complainant 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.

We have processes in place for reviewing and escalating complaints where the complainant is unsatisfied with our complaint handling as we progress the complaint or the outcome.

If the complainant objects to our handling of their complaint or disputes the outcome or any aspect of our response and notifies us, we will escalate the matter to the Data Privacy Manager. 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.

Where reasonably practicable, any internal review will be carried out by a person who was not primarily responsible for the original response.

The Data Privacy Manager will respond to the individual within 10 working days of the referral to the Data Privacy Manager. If the complaint is upheld, the Data Privacy Manager 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 and a decision issued, this decision is final. No further action will be taken, and the complainant will be informed of this.

If the complainant is dissatisfied with the outcome of the complaint, we will inform them that they have the right to lodge a complaint with the ICO and, where appropriate, provide them with details of how to do this. They also have the right to complain to the ICO at any time (the ICO will request that a complaint be lodged with the Company first if the complainant has not already done so) and to lodge a claim before a competent court. In the case of the latter, the complainant has the right to bring a claim before a competent court irrespective of whether they have lodged a complaint with us using our complaints process.