

COMPLAINTS PROCEDURE

INTRODUCTION

At Matrix, we take the protection of personal information seriously, and we welcome all feedback in order to help us to improve. The Data (Use and Access) Act 2025 introduces a duty in force from 19 June 2026 requiring every data controller to operate a process for handling data protection complaints. If you do feel we have not handled your personal information (or the personal information of someone you are acting on behalf of) in line with data protection law, please contact us as soon as possible and we will aim to resolve the issue.

You do not need to use legal terms or refer to particular parts of the 2025 Act in order to make a data protection complaint. For example, you may wish to complain about:

- the way we have responded to a subject access request, or another request to exercise your data protection rights;
- the security measures we have used to store your information, including where you have been affected by a data breach; or
- how we have collected or used your personal information, including where we have stored it, how long we have kept it for, or its accuracy.

Making a complaint will not disadvantage you in any way. You can complain to us, to the Information Commissioner's Office (ICO), or to both, and you do not have to wait for us to deal with your complaint before contacting the ICO. Matrix will accept your data protection complaint regardless of its format.

Sometimes a person may be dissatisfied with our service, or raise another matter, at the same time as exercising their data protection rights. That is not by itself a data protection complaint. For example, you might acknowledge that we responded to a subject access request on time but be unhappy that we did not deal with it more quickly, or you might raise a service issue while also asking us to delete your information. Where your complaint concerns our client service, it will be considered under our separate Complaints Procedure. If we are not sure whether you are making a data protection complaint, we will ask you to clarify.

INFORMING YOU ABOUT YOUR RIGHT TO COMPLAIN

We will tell you in clear and plain language that you can make a data protection complaint to us and to the ICO:

- at the point we collect your personal information, in Member's privacy notices; and
- when we respond to a subject access request.

If you ask us for this information at any other time, we will provide it to you then.

HOW TO MAKE A DATA PROTECTION COMPLAINT

You may make a data protection complaint by any reasonable means. You can:

- email us at matrix@matrixlaw.co.uk;
- write to us by post at Matrix, Griffin Building, Gray's Inn, London WC1R 5LN; or
- telephone us on +44 (0)20 7404 3447.

Please direct your complaint to Daniel Rudd, the Data Protection Lead. If your complaint is about Daniel Rudd, please ask to speak to Alice Brighthouse.

People can also complain through other channels — for example, by contacting any member of Matrix. Whoever you contact, we will accept your complaint and make sure it reaches the right person to be dealt with under this procedure.

Making a complaint by telephone

Many matters are best resolved informally over the telephone, so if you would like to contact us in that way, please call the number above. The person you speak to will take a note of the details of your complaint and what you would like done about it. We will seek to understand the nature of your complaint and the outcome you are hoping for, which helps us to manage expectations and resolve matters quickly. If the matter is resolved on the call, we will record the outcome, check that you are satisfied, and follow this up in writing. If your complaint is not resolved on the telephone, we will deal with it formally under this procedure. If you would prefer to make your complaint by video call or in any other accessible format, please let us know and we will arrange this.

Making a complaint in writing

If you choose to make a complaint in writing, it helps us to investigate and resolve it if you include:

- your name and contact details;
- whose personal information the complaint concerns;
- the detail of your complaint; and
- what you would like done about it.

IDENTITY CONFIRMATION AND AUTHORITY

We may ask you for proof of identity before we respond, and we will ask for this at the earliest opportunity. If we already have enough information to be satisfied of your identity, we will not ask you for more.

If you are making a complaint on behalf of someone else (for example, as a family member, solicitor, advocate, or relevant not-for-profit organisation), we must check that you are authorised to act for that person. Depending on the circumstances, we may ask for an appropriate power of attorney or a signed letter of authority. Where we have no evidence of your authority to act, we will not be able to investigate the complaint until we receive it.

HOW WE HANDLE YOUR COMPLAINT

We will acknowledge receipt of your complaint within 30 days. The 30 days begin the day after we receive your complaint; if the final day falls on a weekend or public holiday, we will acknowledge it by the next working day.

We will investigate your complaint without undue delay. Our investigation begins when we receive your complaint. We will look at all the relevant facts thoroughly, fairly and accurately, speak to relevant members of Matrix, compare your complaint with the information we hold, and check that we have met our own policies and standards. How long an investigation takes depends on the circumstances, including the complexity and scale of the issue and any harm you are experiencing while it remains unresolved.

We will keep you updated on the progress of the investigation. Where the investigation is likely to take some time, we will tell you when we expect to complete it and give you a point of contact for any questions, and we will let you know promptly of any delay.

Where your complaint includes both data protection and other issues, and we are able to resolve the data protection element sooner, we will do so rather than wait to deal with everything at once.

THE OUTCOME OF YOUR COMPLAINT

When we have completed our investigation, we will tell you the outcome directly. Where we are able to investigate and provide an outcome within 30 days, we may do this in a single response rather than acknowledging and responding separately.

We will explain what we have done to resolve your complaint and any action we have taken as a result. If helpful and appropriate, we will respond to each point of your complaint in turn and provide supporting information. If we consider that we have complied with data protection law, we will explain why, and provide sufficient information for you to understand how we reached that conclusion. We may offer an apology if appropriate in the circumstances.

If you remain unhappy with the outcome, you may ask us to review our decision, and we will provide further detail or clarification. You also have the right to complain to the ICO. You do not have to wait for any review before doing so – you can complain to the ICO at any time.

CONFIDENTIALITY

All conversations and documents relating to your complaint will be treated as confidential and disclosed only to the extent necessary. Disclosure may be to those involved in the complaint and its investigation, including the person the complaint is about and the person investigating it. The ICO is entitled to request information about a complainant in course of an investigation.

DATA RETENTION AND RECORD KEEPING

We will keep a record of each data protection complaint, including the date we received it, our acknowledgement, any relevant conversations and documents, the outcome, and any

action we took as a result. This information is processed in accordance with the UK GDPR and our Privacy Policy.

We will retain complaint records for no longer than 2 years, and we will not keep personal information for longer than we need it.

We review our complaints records regularly for trends, patterns and systemic issues. Where risks or issues are identified, we will take measures to address them, including by providing appropriate training. Once we have provided an outcome, we will consider what we can learn or improve to help prevent future complaints.

ACCESSIBLE AND ALTERNATIVE FORMATS

We are committed to making our complaints process accessible to all, including those with disabilities, neurodivergent individuals, and those who may require support due to temporary or permanent vulnerability. If you require information about this process, or if you would prefer to make your complaint by video call or in any other accessible format, please let us know and we will arrange this. Data Protection Complaints may be made by any reasonable means.

When we open a complaint file, we will record your preferred method of communication and ensure that all correspondence is provided in a format suited to your needs. Where a complaint is made by or on behalf of a child, we will respond in plain, clear language appropriate to their age and understanding.

COMPLAINTS TO THE ICO

If you are not satisfied with how we have handled your personal information, you can complain to the Information Commissioner's Office at any time. In most cases, if you complain to the ICO first, they will ask you to raise your complaint with us before they take it further.

You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Helpline: +44 (0)303 123 1113
Website: www.ico.org.uk