



## **Data Protection Complaints Procedure**

### **1. Purpose**

This procedure sets out how Curo receives, investigates, and resolves complaints relating to the handling of personal data. It ensures compliance with the Data (Use and Access) Act 2025, the UK GDPR, and the Data Protection Act 2018 ('Data Protection Legislation') and provides a transparent route for individuals to raise concerns and obtain remedies where things have gone wrong.

### **2. Scope**

This procedure applies to all customers, colleagues, contractors, and other third parties whose personal data we process.

Complaints may relate to any aspect of data handling, including access rights, accuracy, security, sharing, retention, or concerns about fairness and transparency.

### **3. Process**

Individuals may submit a complaint through any of the following routes:

- Email to the Data Protection Officer (DPO) at [privacy@curo-group.co.uk](mailto:privacy@curo-group.co.uk)
- Online complaints form
- Written letter
- Telephone
- In person

Reasonable adjustments (e.g., large print, translation, assisted completion) are available on request.

### **4. Verifying Identity**

If we have reasonable doubts about an individual's identity, we may ask for additional information to confirm their identity before proceeding with a

complaint. Examples include where the complaint is made from an unverified email address. In such circumstances we may ask for a copy of a photo ID (e.g. passport or driving licence) or a copy of a utility bill or bank statement.

We will always require written authority from an individual where a representative submits a complaint on an individual's behalf.

## **5. Stage 1: Receipt and Acknowledgement**

The DPO will carry out an initial assessment to confirm whether the complaint relates to Curo's handling of the individual's personal data. If the complaint relates to something other than the handling of the individual's personal data, it will be handled in accordance with Curo's standard complaints procedure.

### **5.1 Assigning the complaint**

If it is established the complaint relates to Curo's handling of the individual's personal data, the DPO will refer the complaint to a designated manager who will be responsible for the investigation. The DPO will provide advice and guidance as necessary during the investigation. They will not however act as the final decision-maker in relation to the outcome of the complaint.

### **5.2 Logging the complaint**

All details of the complaint are logged in Curo's internal Data Protection Complaints system, including:

- Date received
- Complainant's details
- Summary of concerns
- Any relevant systems, teams, or data assets involved
- Any immediate safeguarding or security risks

### **5.3 Acknowledgement**

The designated manager will issue an acknowledgement to the complainant within 5 working days, confirming:

- The issues understood
- The investigation process
- Expected timescales
- Whether any further information is required from the individual

## 6. Stage 2: Investigation

The designated manager will conduct a structured investigation that includes:

- Speaking with colleagues involved in the processing, where applicable
- Reviewing relevant records, systems and audit trails
- Assessing compliance with data protection legislation including:
  - **Lawful basis** — ensuring we had a valid legal reason to collect and use your personal data.
  - **Purpose limitation** — confirming the data was only used for the specific, stated purpose it was collected for.
  - **Data minimisation** — ensuring we only collected and used the minimum amount of data we genuinely needed.
  - **Accuracy** — verifying that the personal data we held/hold about you is correct and up to date.
  - **Security and access controls** — assessing whether appropriate technical and organisational measures protected your data from unauthorised access or loss.
  - **Compliance with statutory time limits for rights requests** — checking whether we responded to data subject rights requests within the statutory deadlines.
- Identifying root causes and any systemic issues
- Assessing the impact on the complainant, including potential harm or disadvantage

The designated manager will keep the complainant informed of progress of the investigation especially if delays are anticipated.

## 7. Stage 3: Response and Remedies

A full written response will be issued to the complainant within **30 working days**, unless due to complexity, an extension is necessary. In this situation the complainant will be notified as soon as possible, and before the deadline, with revised timescales.

The response will include:

- A summary of the complaint
- The outcome of the investigation - findings of fact
- The conclusion reached - whether Curo upholds, partially upholds, or does not uphold the complaint
- Actions taken or planned

- Information about how to escalate the complaint in the event the complainant is not satisfied with the response.

**Possible remedies include:**

- Correcting inaccurate data
- Providing access to personal data
- Restricting or stopping processing
- Improving security measures
- Updating procedures or staff training
- Offering an apology
- Providing financial or practical redress where appropriate

**8. External Rights**

If the complainant remains dissatisfied, they have the right to escalate their concerns to the Regulator, the Information Commissioner's Office (ICO).