

## Data Protection Complaints Policy for Staff of the Firm

### Purpose

Bruen Financial Services is committed to providing a quality service for its employees and clients alike, in an open and accountable way. We aim to respond to complaints in confidence and in a prompt, polite manner.

### Scope

This procedure addresses complaints from data subject(s) relating to the processing of their personal data, our handling of requests from data subject(s), and appeals from data subject(s) on how complaints have been handled.

### Policy Statement

- Bruen Financial Services has appointed a Data Protection Officer/GDPR. The contact details of our Data Protection Officer/GDPR Owner is published on our website.
- Bruen Financial Services has published clear guidelines on the Complaints Policy page (chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://bruenfs.ie/wp-content/uploads/2021/01/GDPR\_Specific\_Complaints\_Policy.pdf) along with relevant contact details. Any queries or complaints from the data subject(s) will be sent directly to the **Data Protection Officer/GDPR owner**.

Bruen Financial Services provides data subject(s) with its Privacy Notice by publishing it on its website (chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://bruenfs.ie/wp-content/uploads/2022/03/Data-Protection-Privacy-Notice-March-2022-For-website.pdf), under the Privacy Section or in word format as agreed with the data subject.

- Data subject(s) may submit a claim regarding the following:
  - How their personal data has been processed
  - How their request for access to data has been handled
  - How their complaint has been handled
  - Appeal against any decision made following a complaint.
- Data subject(s) lodging a complaint with the **Bruen Financials Data Protection Officer/GDPR Owner** may do so by means of a **Contact Form and/or via email** direct to the **Data Protection Officer/GDPR Owner as published (at this location)** on the company website.
- Data subject(s) may also lodge a complaint in writing. Note: All employees should be aware of the process relating to Subject Access Requests (SAR's). Complaints received by telephone will not be accepted and will need to be in writing.
- Complaints are to be resolved within (**timeframe - GDPR does not give guidance on this timeframe**). We aim to resolve within 1 month

- Appeals on the handling of complaints are to be resolved within (1 month).
- If Bruen Financial fails to act on a data subject(s) access request within 30 days or refuses the request, it must specify in clear and plain language the reasons it was unable to respond or indeed, why the request was refused.
- In line with the GDPR's accountability principle, our organisation will document our reasons for not complying with the timelines. In addition, our organisation will promptly communicate these reasons to the data subject. We are aware the Data Protection Commission will consider the extenuating circumstances and the documented reasons for the delay, should a complaint be received regarding an organisation's responsiveness.
- Bruen Financial will also inform the data subject(s) of their right to complain directly to the supervisory authority (Office of the Data Protection Commissioner). In doing so, we will provide the data subject(s) with the contact details of the supervisory authority (Currently: Office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23) and inform them of their right to seek judicial remedy.

### **Roles and Responsibilities**

- All Employees/Staff are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Data Protection Officer/GDPR Owner-Joe Bruen.
- Data Protection Officer/GDPR Owner is responsible for dealing with all complaints in line with this procedure.

### **Contacts**

- (Name) Data Protection Officer (DPO)/GDPR Owner – Joe Bruen

### **Policy Review**

- Policy Prepared For: (Bruen Financial)
- Approved by Board/Management On: (24/11/2022)
- Policy Became Operational On: (24/11/2022)
- Next Review Date: (24/11/2023)

*Joe Bruen* 21/11/2023