UK Data Protection Complaints Process

UK Data Use and Access Act 2025

Contents

1. Purpose 2
2. Scope 2
3. What Counts as a Data Protection Complaint 2
4. How to Raise a Complaint 3
   4.1 Submission Method 3
   4.2 What you should include in the complaint? 3
5. Acknowledgement of Complaint and Timeframes 3
6. Investigation Process 4
   6.1 Review 4
   6.2 Independence 4
7. Complaint Outcome 4
8. Escalation Rights 5

1. Purpose

The UK Data Use and Access Act (hereinafter DUAA) requires us to establish an effective process for handling data protection complaints.

This process explains how we at Wartsila UK handle data protection complaints relating to Subject Access Requests (SAR hereinafter), breaches, and/or other data accuracy issues under the DUAA and UK data protection law.
In short, a Subject Access Request, also known as right of access, gives you the right to obtain a copy of your personal information, as well as other supplementary information from us processing your data in the capacity of a controller.
Raising a data protection complaint allows you, as an interested individual, to raise a complaint if e.g. you are dissatisfied with how your SAR has been handled, and encourages that complaints are managed fairly, promptly, and transparently.

This complaints process describes the steps to handle data protection complaints of individuals in the UK.

2. Scope

This process applies to everyone subject to the UK data protection law, who has a concern or complaint about the personal data processing, as described in section 3 below. This includes:

- All current and former employees
- Workers, contractors, and job applicants who have submitted a Subject Access Request
- Representatives of customers, suppliers, partners and
- Other interested individuals who have exercised their individual rights from privacy perspective.

3. What Counts as a Data Protection Complaint

A complaint may arise from:

- Complaints relating to the handling of an already submitted SAR or other rights request (including e.g., delays in response, incomplete or unclear responses failed to explain decisions clearly such as how data subjects' personal data has been collected or used, where is it stored, how long is it kept it for, or other inaccuracy issues related to personal data processing; and
- Any complaint alleging an infringement of UK data protection legislation in connection with the processing of personal data, including suspicion of mishandling or misuse of personal data, including concerns about the security measures used to process personal data (including where someone has been affected by a data breach)

Note! If you complain about our service or other matters, whilst also exercising your data protection rights, this does not count as a data protection complaint. For example, you may complain about a customer service issue and also request to delete your personal data.

In addition, if there is ambiguity in whether you are making a data protection complaint or are otherwise alleging an infringement of another UK legislative framework, e.g. where you claim to have been or otherwise suspect being treated unfairly or without transparency, you will be asked to clarify.

4. How to Raise a Complaint

4.1 Submission Method

Data Protection Complaints should be submitted through one the following channels, depending on the way you would want to be contacted back:

- In writing by sending
  - an **email** to Wärtsilä Group Data Protection

    E-mail: dataprotection@wartsila.com

    or
  - A post **letter** to

    Wärtsilä Group Data Protection
    Hiililaiturinkuja 2
    P.O. Box 1834
    00080 WÄRTSILÄ
    Finland

Note! Complaints submitted through any other possible channels will by default be transferred to be handled by email.

4.2 What you should include in the complaint?

Complaints should include (where possible):

- Your full name, contact details and any other details such as account number or user ID for identification purposes.
  NOTE! If you are acting on behalf another person, kindly provide a copy of power of attorney or a signed letter of authority from the person you are acting on behalf of.
- Date of the original SAR if applicable
- Summary of the concern: provide details of your complaint, explaining in a clear and concise manner what has happened and, where appropriate, the effect it has had on you.
- Desired outcome (if known)
- You may send copies of all the key documents as evidence to support the complaint. Please, do not include additional documentation “just in case”. Kindly, use encryption if you are sharing any sensitive data, such as social security number, health data, etc.

5. Acknowledgement of Complaint and Timeframes

The Complaint-handling team will:

- Acknowledge receipt of the complaint within 30 calendar days of receiving the complaint.
- The investigation of the complaint will be handled without undue delay and a full response and outcome will be provided upon receival of all necessary information for data subject identification
- The receipt shall contain the next steps in the complaint handling process, including the following details:

  - Who is handling the complaint
  - Expected timescales for response

- If additional response time is required due to complexity, the complaint-handling team will:
  - Explain why
  - Provide a revised response date when the investigation is expected to finish and
  - Facilitate a point of contact for any questions if applicable.

6. Investigation Process

6.1 Review

The investigation will include:

- Review of the original SAR, response (if applicable) and timelines
- Review of correspondence and decision-making
- Assessment of any exemptions relied upon should there be sufficient grounds for dismissal of the complaint

In case fulfilment of the complaint requires further actions (e.g. more information requested or in case of restrictions of data processing), the complaint-handling team together with stakeholders from the relevant business/support function shall prepare an implementation plan and communicate it to relevant persons (e.g. application owners and other function) and where appropriate, the nominated Data Protection Officer (DPO hereinafter) for the UK should be involved.

6.2 Independence

Where possible, the complaint should be reviewed by:

- Either a different HR representative from the one who handled the original SAR, or
- the relevant Global Data Privacy Manager or
- UK DPO where applicable

7. Complaint Outcome

The Complaint -handling team will assess and conclude your complaint in writing based on the information gathered, taking into account the nature of request, as well as the legal grounds existing for declining or accepting the complaint.

The response will:

- Address each issue raised
- Explain the findings clearly and in plain language
- Confirm whether the complaint is:

  - Upheld
  - Partially upheld
  - Not upheld

Where the complaint is upheld, the complaint-handling team or the appointed point of contact towards the Data Subject shall communicate the decision to decline the complaint to the Data Subject without undue delay.

The complaint-handling team may:

- Issue a revised SAR response
- Provide additional information
- Correct inaccurate data, etc.

NOTE! Fulfilling Data Protection complaints should not lead to undermining or otherwise breaching other Data Subjects' or Wärtsilä's rights and freedoms.

Please be informed that Wärtsilä shall have the right to dismiss complaints, where these are substantially unfounded or there is otherwise founded suspicion of false or frivolous behaviour.

The complaint-handling team will document the case, including the complaint and outcome of it, in a diligent manner for accountability purposes.

8. Escalation Rights

If you are dissatisfied with the outcome of the complaint, please be informed of your right to raise the matter with the local Data Protection Authority:

Information Commissioner's contact details:

- **Postal address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- **Helpline:** 0303 123 1113.
- **Website/Contact Form:** ico.org.uk/global/contact-us/.