Data Protection Complaints Procedure

Effective date: 30 October 2026

1. Introduction

This procedure applies to Keating Chambers, Keating Chambers Service Company Limited and Members of Chambers (together referred to as Keating Chambers) and explains how individuals can complain if they believe that the UK GDPR has been infringed with respect to the processing of their personal data. It also explains what information may be needed, how complaints will be considered, and what response complainants can expect.

Keating Chambers is committed to handling personal data lawfully, fairly, securely and transparently. This procedure is intended to meet the requirements introduced by section 164A of the Data Protection Act 2018 (as amended by the Data (Use and Access) Act 2025) with respect to the handling of data protection complaints from 19 June 2026.

2. When to use this procedure

This procedure should be used where an individual believes Keating Chambers may have infringed the UK GDPR in the way it has collected, used, stored, shared, retained, protected, deleted or otherwise handled their personal data, or the personal data of someone they are authorised to act for.

Examples include complaints about:

- responses to data subject rights requests, including access, rectification, erasure, restriction, objection and portability;
- the accuracy of personal data held by Chambers;
- suspected or actual personal data breaches;
- how personal data has been collected, used, shared, retained or deleted;
- security arrangements for protecting personal data; or
- any other issue relating to compliance with the UK GDPR.

This procedure does not replace Chambers' procedure for complaints about legal services, grievance procedure, regulatory reporting or obligations with respect to data subject rights requests or data breaches. If a complaint raises both data protection issues and legal services issues, Chambers may ask for clarification and may deal with different parts of the complaint under different procedures where appropriate.

3. Scope and responsibilities

This procedure applies to data protection complaints concerning personal data processed by Keating Chambers where the processing relates to Chambers' activities or legal services provided through Chambers.

Where a complaint concerns client matter data, confidential information, legally privileged material, or personal data processed by more than one controller or processor, Chambers will ensure that the complaint is handled as appropriate with reference to the relevant controllers.

Where a complaint relates to a suspected or actual personal data breach, it will be escalated promptly and handled in line with Chambers' personal data breach procedures.

4. How to make a complaint

A complaint may be made by email to gdpr@keatingchambers.com. Correspondence should be clearly marked "Data Protection Complaint" where possible.

Complaints may also be made in writing to:

Chief Executive Officer
Keating Chambers
15 Essex Street
London WC2R 3AA
Email: gdpr@keatingchambers.com

A complaint may also be received through another route. If Chambers receives a concern through another channel that appears to raise a data protection complaint, the concern will be directed to the GDPR mailbox or the nominated person without undue delay.

5. What to include

Please provide as much information as possible so Chambers can understand and respond to the complaint, including:

- name and contact details;
- a description of the concern;
- relevant dates;
- copies of correspondence or reference numbers;
- details of the personal data involved;
- the outcome sought; and
- confirmation if the complaint is made on behalf of someone else.

Chambers may ask for further information or clarification of concerns. Chambers may ask for proof of identity before investigating a complaint. If a complaint is made by a representative, Chambers may need evidence that the representative is authorised to act, such as a signed letter of authority or power of attorney. If appropriate evidence is not provided, Chambers may be unable to investigate the complaint or disclose information to the representative.

6. Acknowledgement and response to complaint

Chambers will acknowledge receipt of a data protection complaint without undue delay and, in any event, within 30 days of receiving it.

The complaint will be referred to the Chief Executive Officer or another appropriate person nominated by Chambers. The nominated person will consider whether the complaint should be handled by Chambers, by an individual Member of Chambers, jointly with another controller, or with input from an external adviser.

Chambers will take appropriate steps to provide a response to the complainant without undue delay. This may include making enquiries, reviewing relevant records, asking for clarification or further information. Chambers will keep the complainant informed of progress and anticipated timeframes where it takes longer than one month to provide a response to the complaint.

7. Outcome and remedies

Once any enquiries or investigation is complete, Chambers will provide the complainant with a response to the complaint without undue delay. The response will explain, where appropriate, what Chambers investigated, the findings, whether the complaint is upheld in whole or in part, any action Chambers will take, and any further steps available to the complainant.

Where a complaint is upheld, possible actions may include:

- correcting inaccurate data;
- completing or revisiting a request to exercise data subject rights;
- improving security measures;
- amending internal processes;
- providing further clarification or explanation;
- offering an apology;
- updating records; or
- taking other appropriate remedial action.

8. Escalation to the Information Commissioner's Office

If the complainant remains dissatisfied after receiving Chambers' response, or believes Chambers has not handled the data protection complaint appropriately, they may raise the matter with the Information Commissioner's Office.

Post	Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Website	ICO complaint page
Telephone	+44 (0)303 123 1113

9. Record keeping and learning

Chambers will keep appropriate records of data protection complaints, including the issues raised, steps taken, decisions made, communications with the complainant, outcomes and remedial actions.

Chambers may review complaints periodically to identify recurring issues, lessons learned and opportunities to improve data protection compliance and operational practice.

10. Review

This policy must be applied consistently, made readily available and reviewed periodically to ensure it remains effective and compliant with current regulatory requirements.

Last review date – October 2026.