

EXTERNAL – DATA PROTECTION COMPLAINTS POLICY AND FORM

As a healthcare service provider delivering home oxygen, sleep therapy, and complex respiratory care, Dolby Medical Home Respiratory Care Limited (trading as **Vivisol UK**) processes personal and sensitive personal data, including special category health data and clinical records.

Complaining to us

You have the right to make a data protection complaint to Vivisol UK at any time. You can use the form at the bottom of this page if you wish to complain. The form is designed to make it easier and quicker for you to provide us with the information we need to investigate your complaint efficiently.

We also accept complaints made by email, post or telephone. You can submit a complaint to us:

- By email to dataprotection@vivisol.co.uk. Please make the subject line "Data Protection Complaint".
- By post to Dolby Medical Home Respiratory Care Limited, Palladian, Manor Royal, West Sussex, RH10 9PY. Please mark the envelope "Private and Confidential - Data Protection Complaint".
- By telephone at 0800 917 9840 (available 24/7/365). If you make a complaint by telephone, we will provide you with a written summary of your complaint by email or post (and ask you to confirm it reflects your complaint) and a reference number for your records.

Where a complaint is made through social media or another insecure public channel, we will ask you to continue the complaint through a more secure method to protect your data.

We are committed to making this complaint process accessible to everyone. If you need this form in large print, audio format, braille, Easy Read or another language, or if you need support to complete it, please let us know by contacting us using the telephone details above. We can arrange for a member of staff to help you complete this form by telephone. If you are a child or vulnerable adult, we may contact you to offer additional help and information.

A third party (someone other than yourself) can make a data protection complaint on your behalf. They must complete section 3 of the form below. You can nominate any third party and change that third party at any point.

Complaining to the regulator

You can also make a complaint to the Information Commissioner's Office (**ICO**) (the UK regulator for data protection issues). You do not have to complain to us before you contact the ICO, but the ICO may ask if you have contacted us about your complaint first. The ICO can be contacted at www.ico.org.uk or on 0303 123 1113.

NON-DATA PROTECTION AND MIXED COMPLAINTS

If your complaint does not relate to data protection, or includes non-data protection aspects, you should explain this in section 5. We will let you know if you need to make your complaint in a different way or if we will handle it under a different policy.

VERIFYING YOUR IDENTITY

We may ask you to provide evidence of your identity before we can progress your complaint, particularly where it involves personal data. We will only ask for information that is reasonably necessary to verify your identity if we do not already have sufficient information.

TIMESCALES FOR RESPONDING TO YOUR COMPLAINT AND NEXT STEPS

We will:

- Acknowledge receipt of your complaint within 30 days.
- Investigate your complaint without undue delay and keep you updated on progress.
- Inform you of the outcome as soon as reasonably practicable. For complex complaints, we will give you an anticipated timeframe.

If you are dissatisfied with our response, you may ask us to escalate your complaint internally, or you may contact the ICO directly as described above.

PRIVACY NOTICE (COMPLAINT HANDLING)

The personal data you provide in this form will be processed by Dolby Medical Home Respiratory Care Limited to investigate and respond to your data protection complaint. We may also use it for internal training and process improvement. Our lawful basis for processing this data is compliance with a legal obligation (*Article 6(1)(c), UK GDPR*) and, where applicable, the exercise or defence of legal claims (*Article 9(2)(f), UK GDPR*) for any special category data. We may also rely on the processing being in our legitimate interests (*Article 6(1)(f), UK GDPR*).

To investigate your complaint, we may need to share information you provide with other departments, our suppliers or partners. This will depend on the nature of the complaint.

We maintain records of complaints and how they are handled.

Vivisol UK will only retain personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements in connection with the data protection complaint. We may retain personal data for a longer period if we reasonably believe there is a prospect of litigation in respect of a complaint, after which it will be securely deleted or anonymised under our Data Retention Policy.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means. Further information is set out in our Data Retention Policy and provided to individuals in our Privacy Policy (linked above).

For full details of how we handle your personal data, please see our Privacy Policy, available at <https://www.vivisol.co.uk/privacy-policy/>

1. Complaint contacts information

Complete all relevant fields below with your personal details (those marked with an *asterisk are mandatory). We need this information to process your complaint and communicate with you.

If you are making a complaint on behalf of someone else, provide their details here and your own details in section 3.

Title:	
*First and last name:	
Any other names that you have been known by (including nicknames and previous surnames that are relevant to this complaint):	
Telephone number:	
*Email address:	
Home address:	
Country of residence:	
Preferred method of contact:	
Any other information that may help us identify you (for example, your relationship to our organisation):	
Do you need any adjustments or support to help you make or progress your complaint? This could include receiving information in another format, using a preferred communication method, translation or interpretation support, or other accessibility adjustments. Please only tell us what we need to know to support you.	

2. Proof of identity

2.1 We need to verify your identity before we can respond to your complaint. To help us establish your identity you must provide identification that clearly shows your name, date of birth and current address. We accept a photocopy or a scanned image of one of the following as proof of identity (please indicate which you have provided):

- ☐ Passport or photo identification such as a driving licence.
- ☐ Birth or adoption certificate.
- ☐ Other proof of Identity

- 2.2 If you do not have any of these forms of identification available, please contact our Data Protection Officer, Benjamin Garner, at benjamin.garner@vivisol.co.uk or dataprotection@vivisol.co.uk for advice on other acceptable forms of identification.
- 2.3 [In some cases, we may ask you to provide a copy of a bank or credit card statement or utility bill showing your current address and dated within the last three months.]
- 2.4 If you have changed your name, please provide the relevant documents showing the change (for example, marriage certificate or deed poll).
- 2.5 We may request additional information from you to help confirm your identity. We may not be able to act on your complaint if we cannot identify you.

3. Complaints made on a complainant's behalf

- 3.1 If you are acting on the complainant's behalf, please complete the fields below with your name and contact details (those marked with an asterisk are mandatory).

Title:	
*First and last name:	
Contact address:	
Telephone number:	
*Email address:	
Preferred method of contact:	
*Relationship to the complainant (for example, solicitor, adviser, parent or carer):	
Has the complainant previously authorised you to act on their behalf in dealings with us? If yes, please provide details	
*Do you have legal authority to request the complainant's information (for example, power of attorney, parental proof, guardianship or complainant's written consent)?	
Scope of your authority:	
If the complainant is under 18, do you have parental authority to act for them?	
May we contact the complainant directly?	
Issues we should be aware of (for example, time limits or urgency):	
Do you need any adjustments or support to help you make or progress your complaint?	

This could include receiving information in another format, using a preferred communication method, translation or interpretation support, or other accessibility adjustments. Please only tell us what we need to know to support you.	
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3.2 If not already provided to us, we need proof of your legal authority to act on the complainant's behalf (please indicate which you have provided):

- ☐ A written consent signed by the complainant.
- ☐ A certified copy of a power of attorney.
- ☐ Evidence of parental responsibility.
- ☐ Other Proof of Authority

3.3 We may ask you for additional information to help confirm your identity and the complainant's identity. We may not be able to act on the complaint if we cannot identify the complainant or verify your legal authority to act on their behalf. Please be aware that we may need to verify your authority before we can discuss the complaint with you.

4. Information about the organisation your complaint is about

4.1 In most cases, the organisation your complaint is about will be the organisation you are submitting this form to. However, if your complaint relates to a specific part of our organisation, a service provider acting on our behalf or a joint arrangement with a partner organisation, please provide details below.

Departments you have dealt with or who may have information relevant to your complaint:	
Service providers or partners you have dealt with or who may have information relevant to your complaint:	
Any other relevant information: Please only provide information necessary for us to understand and investigate your complaint. You do not need to provide personal details about individual staff members or anyone else unless they are directly relevant to your complaint.	

5. Description of your complaint

Use this section to tell us what happened. You do not need to use legal language. Be as clear and specific as you can. You may use the additional information box or continue on a separate sheet if needed.

Date of incident or discovery:	
Is the issue ongoing?	☐ Yes

	☐ No ☐ Unsure
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Description of the issue Tell us, in your own words, what occurred. Please include: • What personal data is involved • What you believe went wrong • How it has affected you
What personal data is involved? Describe the type of personal data you believe is affected (for example, your name, address, health information, financial details (do not provide any account details, account passwords or credit card information), photographs or online identifiers). You do not need to list every category.

Does your complaint involve special category or sensitive data?

Please check all that apply.

- ☐ Health or medical information.
- ☐ Racial or ethnic origin.
- ☐ Religious or philosophical beliefs.
- ☐ Political opinions.
- ☐ Trade union membership.
- ☐ Genetic or biometric data.
- ☐ Sexual orientation or sex life.
- ☐ Criminal convictions or offences.
- ☐ Financial data.
- ☐ Other sensitive information.
- ☐ None of the above/I am unsure.

Does your complaint also relate to matters that are not data protection issues, for example, a customer service dispute, billing dispute or employment matter?

- ☐ Yes.
- ☐ No.

☐ Unsure.

If Yes, please briefly describe the non-data protection issue(s).
Additional information about your complaint

6. Prior contact and correspondence

Have you previously contacted us about this issue?

☐ Yes

☐ No

☐ Unsure

If yes, please provide the following details.

Date(s) of contact:	
Method of contact (please indicate email, telephone, post, online form, in person or other. If other, please provide specific details):	
Name of person or team contacted (if known):	
Summary of response received (if any):	
Please provide any reference numbers from previous correspondence with us:	

7. Supporting documents

You may enclose copies of documents that support your complaint. Do not send original documents and only enclose information relevant to your complaint.

Are you enclosing any supporting documents with this form?

☐ Yes.

☐ No.

If Yes, please describe the documents in the following table. You may add or delete rows, or continue on a separate sheet as necessary.

Documents

8. Outcome sought

Please tell us what you would like us to do to resolve your complaint.

What outcome or remedy are you seeking?
Is there anything else you would like us to know about the outcome you are seeking?

Signature and acknowledgement

I, (name), confirm that the information provided on this form is correct and that I am the person whose name appears on this form. I understand that:

- Vivisol UK must confirm proof of identity and may need to contact me again for more information; and
- Vivisol UK may not be able to respond to my complaint if it does not receive all of the required information to process the complaint.

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Signature

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Date

Authorised person signature

I, (name), confirm that I am authorised to act on behalf of the complainant. I understand that Vivisol UK must confirm my identity and my legal authority to act on the complainant's behalf, and may need to request more verifying information.

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Signature

.....

Date