

DATA PROTECTION COMPLAINTS PROCEDURE

1. Introduction

- 1.1. This Data Protection Complaints Procedure (this “procedure”) sets out guidance and the procedure to be followed by all employees, workers and contractors (“personnel”, “you”, “your”) of ENSCO 2345 Limited t/a Zapgo (“ENSCO 2345 Limited t/a Zapgo”, “we”, “us”, “our”) in the event that a data protection complaint is received. This procedure relates to individuals whose Personal Data we collect and process (“Data Subjects”).
- 1.2. This procedure has been prepared with due regard to the data protection laws applicable to ENSCO 2345 Limited t/a Zapgo and our Personal Data Processing activities. These data protection laws include the UK GDPR and the EU GDPR (whichever is applicable) and the Data Protection Act 2018 (“DPA 2018”), as amended from time to time (collectively referred to as the “Data Protection Law”).
- 1.3. This procedure should be read together with the following related documents:
 - a) ENSCO 2345 Limited t/a Zapgo Data Protection Policy
 - b) ENSCO 2345 Limited t/a Zapgo Data Protection Complaints Form

Please note, that the definitions for any undefined terms in this document can be found in ENSCO 2345 Limited t/a Zapgo’s Data Protection Policy and are applicable to this procedure.

2. Purpose of this Procedure

- 2.1. It is important to facilitate data protection complaints in the manner required by law. The purpose of this procedure is to set out what is required of ENSCO 2345 Limited t/a Zapgo when a data protection complaint (a “complaint”) is received from a Data Subject.
- 2.2. A Data Subject can make a complaint at any time and through any means of communication. It is important that all ENSCO 2345 Limited t/a Zapgo employees are aware of complaints and the steps to take upon receipt of a complaint.

3. Scope

- 3.1. This procedure applies to all Personal Data processed by ENSCO 2345 Limited t/a Zapgo, whether held in electronic form or in physical records, and regardless of the media on which that data is stored. It applies to Personal Data we process as a Data Controller and Personal Data we process as a Data Processor (on behalf of our customers).
- 3.2. ENSCO 2345 Limited t/a Zapgo is registered as a Data Controller with the Information Commission having registration reference ZB636520.

4. Steps to Follow

- 4.1. The following steps and actions are to be taken in the order shown upon receipt of a complaint:

4.2. Always

No.	Step	Action
1.	A Data Subject submits a complaint. This can be by any means, including social media, email, through our website, by letter, telephone or in person. It may be received by any ENSCO 2345 Limited t/a Zapgo employee or worker.	Communicate receipt of a complaint internally without delay, by sending an email with details of the complaint to complaints@zapgo.co.uk

4.3. ENSCO 2345 Limited t/a Zapgo as a Processor

2.	Notify the Data Controller where ENSCO 2345 Limited t/a Zapgo is a Data Processor.	If the complaint in question relates to ENSCO 2345 Limited t/a Zapgo's activities as a Data Processor, the complaint shall be forwarded to the Data Controller without delay and, if so authorised by the Controller, ENSCO 2345 Limited t/a Zapgo shall notify the Data Subject that they are a Data Processor and the complaint has been passed to the Data Controller.
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4.4. ENSCO 2345 Limited t/a Zapgo as a Controller

3.	Acknowledge the complaint and request proof of identification, if necessary.	ENSCO 2345 Limited t/a Zapgo shall acknowledge the complaint within 30 days of receipt of the complaint. Proof of identification, if required, shall be requested at the same time. There is no legal requirement for Controllers to request proof of identification and it shall not be requested as a matter of routine. Each case shall be assessed on its own facts. If proof of identification is necessary, the attached Data Protection Complaints Form shall be used to assist in the process. The General Counsel and IT Manager shall consult with the Data Protection Officer and shall assess the complaint and the information provided by the Data Subject.
4.	Investigate the complaint and inform the Data Subject of the outcome, keeping the Data Subject updated with progress at regular intervals.	The complaint shall be investigated without undue delay and once the investigation has been completed and a decision has been made, the Data Subject shall be notified. If the investigation takes longer than one month, the Data Subject shall be provided with progress updates once a month.
5.	Record the complaint and the actions taken.	A record of all complaints shall be kept to demonstrate that the complaints have been facilitated and we have complied with the law.

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5. Time Limit to Respond

- 5.1. All requests shall be managed by the General Counsel and the IT Manager who shall record the date on which the request was originally received. The 30 days shall start on the date the request is received.

6. Implementation & Policy Management

- 6.1. This procedure shall be deemed effective as of 12 July 2026 No part of this procedure shall have retroactive effect and shall thus apply only to matters occurring on or after this date.
- 6.2. This procedure shall be reviewed by the General Counsel and the Data Protection Officer in line with the annual review of all policies for ENSCO 2345 Limited t/a Zapgo and following any Personal Data breach.

Schedule 1

Data Protection Complaints Form

This form can be amended as appropriate with the authorisation of the ENSCO 2345 Limited t/a Zapgo's Data Protection Officer.

ENSCO 2345 Limited t/a Zapgo Data Protection Complaints Form

About this Form

This form is used by ENSCO 2345 Limited t/a Zapgo to confirm your identity when you are making a data protection complaint or you are acting on behalf of someone else who is making a data protection complaint.

Once completed, please send this form and any attachments to complaints@zapgo.co.uk to ENSCO 2345 Limited t/a Zapgo, or to the address below, marked for the attention of the General Counsel and the IT Manager: 5th Floor, 167-169 Great Portland Street, London, England, W1W 5PF

Complainant's Details

Please confirm the contacts details of the person making the complaint:

Title	
First Name	
Surname	
Address	
Telephone No.	
Email Address	

Identity Verification of the Complainant

We may ask you to prove your identity. If requested, please provide us with further information to enable us to verify your identity. If you provide additional documents for this purpose, please only send copies to us and not originals, as the documents will not be returned to you:

Details of further information to enable us to verify your identity	
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Third Parties Acting for the Data Subject

If you are acting on behalf of a complainant, please confirm the nature of your relationship with them and provide us with proof that you are entitled to act on their behalf. If you provide additional documents for this purpose, please only send copies to us and not originals. Please also provide us with your contact details:

Details of your relationship with the complainant and proof provided	
Your Title	
Your Surname	

Your Address	
Your Telephone No.	
Your Email Address	

Details of the complaint

Please explain your complaint and the outcome you want and attach any supporting documentation you may have to enable us to fully assess your complaint. Please continue on a separate sheet, if necessary.	
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Declaration

I confirm I am the complainant named above:

Signature	
Full Name	
Date	

OR

I confirm I am the third party named above and that I am entitled to act on behalf of the complainant named above:

Signature	
Full Name	
Date	