

Neotree Data Protection Complaints Policy

1. About this policy

This policy explains how you can make a data protection complaint to Neotree, and what we will do when you do. It applies to anyone whose personal data we handle. That includes parents and family members whose child's data is in the Neotree system, healthcare workers whose information we hold, employees, donors, contacts, and anyone else who has been in touch with us.

We have to operate this complaints process by law. The relevant law in the UK is section 164A of the Data Protection Act 2018 (added by the Data (Use and Access) Act 2025), which takes effect on 19 June 2026. We also follow the guidance the UK Information Commissioner's Office (ICO) has published on how to handle complaints. If your data is held in Zimbabwe or Malawi, you can also use this process, and we'll work with our colleagues in those countries to handle your complaint and tell you what your local rights are.

If you'd rather ask a question before making a formal complaint, you can use the contact details in section 3.

2. What counts as a data protection complaint

A data protection complaint is a concern you raise about how Neotree handles your personal data, or somebody else's data that you are entitled to act on (for example, your child's). Things you can complain about include:

- We have used your data in a way you didn't expect, or in a way we don't have permission for.
- We are keeping your data when we shouldn't be.
- We won't give you access to your own data when you've asked, or have given you the wrong data.
- We've shared your data with somebody who shouldn't have it.
- Our systems weren't secure enough and your data was exposed.
- We aren't being clear about what we do with your data.

If you have a concern that isn't about personal data, such as clinical care or a service issue at a hospital, please use the relevant complaints route for the organisation involved. If you aren't sure whether your concern is a data protection matter or something else, get in touch and we'll help you work it out.

3. How to make a complaint

You can make a complaint in any of the following ways.

By email: complaints@neotree.org

By post: Data Protection Officer Neotree (Charity no. 1186748) 1 Blossom Yard, Fourth Floor
London E1 6RS United Kingdom

Through any member of Neotree staff. If you tell a Neotree employee, a clinician using the Neotree app, or anyone else working on our behalf that you want to make a complaint, they will pass it on to us. You do not have to use a specific form or specific words. If you tell us "I want to make a complaint about my data," that is enough.

If you have a disability, language need, or any other reason you can't use the channels above, please let us know what would work for you and we will find a way.

You can also ask somebody else to make a complaint on your behalf. That might be a family member, a healthcare worker, or a legal representative. If you do, we will ask them for evidence that you have authorised them to act for you before we can share information about your complaint with them.

You don't need to give us specific evidence or proof of identity to make a complaint. We will only ask for identification if we can't otherwise be confident who we're dealing with.

4. What we will do when we receive your complaint

We will:

1. **Confirm we've received it within five working days.** You'll get a reply by email (or by post if that's how you wrote to us), with a reference number.
2. **Start looking into your complaint on the day we receive it,** not when we send the acknowledgement.
3. **Keep you informed** about what we are doing. If your complaint is complicated, you'll hear from us at least once a month while we investigate.
4. **Give you our answer in writing** once we've finished. Our answer will go through each thing you raised and tell you what we found.
5. **Tell you who you can complain to next** if you are not happy with our answer.

If your complaint reveals that something has gone wrong with our handling of data more widely, we may open a separate breach investigation. We'll keep you informed about what that means

for your complaint, and we'll close the loop with you whether or not the wider investigation is still ongoing.

5. How long it will take

We aim to give you a final answer within **one month** of the day we receive your complaint.

If your complaint is more complex and we need longer, we will tell you and will give you our final answer within **three months** at the latest. You'll hear from us at least once a month while we are still looking into it.

If we can answer you within five working days, we'll combine the acknowledgement and the answer into a single reply.

6. Your right to take your complaint further

If you're not happy with our answer, or if you'd rather not come to us first, you can take your complaint to the data protection regulator. Which one depends on where your data is held.

Where your data is held	Regulator	How to contact them
United Kingdom	Information Commissioner's Office (ICO)	ico.org.uk · 0303 123 1113 · Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Zimbabwe	Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ), Zimbabwe's data protection authority	potraz.gov.zw · +263 242 333 032 · the.regulator@potraz.gov.zw · P.O. Box MP 843, Mount Pleasant, Harare
Malawi	Malawi Communications Regulatory Authority (MACRA), acting as Malawi's Data Protection Authority	dpa.mw (online complaint form at dpa.mw/lodge-a-complaint) · +265 991 80 21 80 · info@dpa.mw · 1st Floor, Green Heritage House, 2 Khonje Close, City Centre, P.O. Box 30214, Lilongwe 207213

You can go to a regulator at any time. You don't have to wait for our response. The regulators will usually ask whether you've raised the issue with us first, so giving us a chance to answer is usually a good idea, but it's your choice.

7. How we handle your personal data when we are investigating

To look into your complaint, we will need to read your personal data in our systems and share it with the people investigating. We will only use your data for what is needed to handle your complaint and to show, if asked, that we have handled it properly.

We keep complaint records for **six years from the date the complaint is closed**. After that, we either delete the records or keep them in a non-identifying summary form for our own learning. We hold the smallest amount of your personal information necessary to handle the complaint. We don't quote your personal details in the register unless we have to.

If you'd like to know more about how we look after your data generally, that's covered in our privacy notice (link to be added when published).

8. Anonymous complaints

You can make a complaint anonymously. We will look into it as far as we can, but it's harder to give you a proper answer if we don't know who you are. If you'd like to stay anonymous to us but still receive a reply, you can give us a contact channel that doesn't identify you, such as a temporary email address. We'll use it only for replying to your complaint.

9. Children and young people

If you are a parent or guardian making a complaint about your child's data, please tell us in your message. We may ask you to confirm your relationship to the child before we share information about the complaint with you.

If you are a child or young person making a complaint about your own data, we will treat your complaint seriously and reply to you in plain language. Please tell us if there is anything we can do to make the process easier for you, such as using a particular contact method or involving a trusted adult.

10. If you're unhappy with how we handle your complaint

If you are not satisfied with our answer, or with how we have handled the complaint itself, you can ask us to take another look. The Data Protection Officer, or someone not previously involved, will review and reply to you.

You can also go directly to the regulator at any time (see section 6).

11. Who is responsible for this policy

The **Data Protection Officer** is responsible for this policy and for the complaints process it describes. The DPO reports to the **Data Compliance Working Group** (DCWG), which reviews the complaints register every quarter to spot patterns and improve the process.

The **Data Management Committee** (DMC) oversees the DPO's work and reports to the **trustees** of Neotree. The trustees noted this policy and approved its overall approach at their July 2026 meeting.

12. Review and changes

We review this policy at least once a year, and sooner if the law changes or if we learn something from a complaint that means we should change how we do things. Changes are approved by the DCWG. The current version, effective and review date are at the top of this policy.