

# DATA PRIVACY COMPLAINTS PROCEDURE

This Data Privacy Complaints Procedure is available for any data subject whose personal data is processed by Dowlis Inspired Branding Inc. Please refer to the sections below to find the information relevant to your request or complaint.

## 1. EMPLOYEES

**1.1** As an employee of Dowlis Inspired Branding Inc, if you have a complaint about the way in which your personal information has been handled or if you would like to request access to copies of your HR file or other personal information or exercise any of your other rights, please contact an HR representative from your local office. If you are not satisfied with the response of the HR representative, you may proceed with the complaints procedure for Other Inquiries, as described below.

**1.2** If you do not feel comfortable in making your complaint to your local HR department, you may direct your query to the Data Privacy Office.

## 2. FORMER EMPLOYEES

**2.1** As a former employee of Dowlis Inspired Branding Inc, if you would like to request access to copies of your personal information, such as your HR file or exercise any of your other rights, please contact an HR representative. Absent exceptional circumstances, we will acknowledge your request within 48 business hours and will provide a substantive response as soon as practicable, in accordance with any time limits set down by law. Where permitted by law, we may charge a fee for the provision of copies of your personal information.

**2.2** If you are not satisfied with our response, you may proceed with the complaints procedure for Other Inquiries, as described below.

## 3. MARKETING REQUESTS

If you would like to request marketing materials from Dowlis Inspired Branding Inc, please contact our Marketing Director through the main head office number. If you would like to update your contact information Dowlis Inspired Branding Inc marketing materials, or if you would like to be removed from any e-mail or other distribution lists for Dowlis Inspired Branding Inc marketing materials, please also contact the Dowlis Inspired Branding Inc Marketing Director. Absent exceptional circumstances, we will remove your email address from the relevant distribution list(s) within 48 business hours. If you are not satisfied with our response, you may proceed with the complaints procedure for Other Inquiries, as described below.

## 4. OTHER INQUIRIES

**4.1** If you have a complaint about the way in which your personal information has been handled or would like to access or correct your personal information or exercise any of your other rights, please contact the Data Privacy Office. The Data Privacy Office monitors compliance with the Dowlis' Data Privacy Standards and is the initial contact point for any enquiry or complaint relating to compliance with those Standards. The Data Privacy Office will undertake an independent review of the investigation into your complaint and advise you of the conclusions. The Data Privacy Office may be contacted through the Dowlis Inspired Branding Inc head office number.

**4.2** You may request a full copy of the Dowlis Inspired Branding Inc Data Privacy Standards by contacting the Data Privacy Office. In order to receive a full copy of the Data Privacy Standards, you will need to sign a confidentiality agreement in a form acceptable to us. The requirement to sign a confidentiality agreement will not prevent you from sharing information with a lawyer in order to obtain legal advice or from using the Data Privacy Standards in legal proceedings in order to exercise your rights.

**4.3** You may submit your request or complaint via our Head Office main number, which will be forwarded on to the Data Privacy Office to complete your request. Please provide an accurate email address with the following information:

- (a) your full name;
- (b) your address;
- (c) the full details of your data privacy request or complaint;
- (d) any previous correspondence with us regarding the specific data privacy issue; and
- (e) if you have incurred a loss, evidence to show the value of the loss.

**4.4** We may ask you to provide proof of your identity.

**4.5** Upon receipt of a request or complaint, Dowlis Inspired Branding Inc will:

- (a) confirm receipt, where possible, within 2 working days;
- (b) assess the request or investigate the complaint fully; and
- (c) advise you of the outcome within 2 weeks of receipt of your written request or complaint except that, if the investigation or assessment cannot be completed within 2 weeks, we will write to you to tell you when we expect to respond.

**4.6** If you are still not satisfied with our actions and findings, or at any other time if you so choose, you may:

- (a) contact and/or lodge a complaint with the EMEA Managing Director who can be contacted via our Head Office main number
- (b) contact and/or lodge a complaint with the data protection authority in the jurisdiction in the European Economic Area in which you work or are habitually resident, or where the alleged breach took place. Contact details can be found at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en); or
- (c) bring a claim in the relevant courts as specified under Rights of Redress below.

## **5. RIGHTS OF REDRESS**

**5.1** The provisions of this section 5 apply to:

- (a) personal data which is processed by Dowlis Inspired Branding Inc as a data controller and which is governed by laws implementing European Regulation 2016/679 and related European privacy legislation, including the UK Data Protection Act 2018; and
- (b) the export of such personal data outside of the EEA or the UK by Dowlis Inspired Branding Inc and the processing of such exported data by another Dowlis Inspired Branding Inc entity (either in the capacity of a data controller or a data processor) located outside the EEA.

**5.2** If any Dowlis Inspired Branding Inc entity breaches the Standards with respect to your personal data in the circumstances described in 5.1 above, you are entitled in accordance with the provisions of this section 5 to bring a claim as a third party beneficiary in:

- (a) the courts of the EEA jurisdiction of establishment of the relevant Dowlis Inspired Branding Inc data controller that initially collected the personal data to which your claim relates;
- (b) the courts of the EEA jurisdiction of establishment of the relevant Dowlis Inspired Branding Inc data controller that exported the personal data to which your claim relates;

(c) the courts of the EEA jurisdiction in which you are habitually resident.

The selected jurisdiction will be referred to as the "Relevant Jurisdiction."

**5.3** The submission by a Dowlis Inspired Branding Inc entity to the Relevant Jurisdiction does not, in respect of any claims that do not relate to compliance by Dowlis Inspired Branding Inc with the Standards or for any other purpose whatsoever, constitute a submission by the relevant Dowlis Inspired Branding Inc entity to the jurisdiction of such courts or a waiver by the relevant Dowlis Inspired Branding Inc entity of its right to claim *forum non conveniens*.

**UPDATED January 2022**