

# **Privacy Notice for Service Complaints**

## **Service description**

In order to deal with your complaints and/or enquiries, it is necessary for us to collect and hold personal information about you.

## **Processing activity**

The information collected and held will vary and depend on the nature of your complaint. You can raise your complaint with us by telephone, e-mail, letter or in person. All we ask is that you clearly tell us, who is making the complaint, how we can reply to you and enough details about your complaint so that we can start dealing with it as soon as possible.

## **Information requirements**

You are not required to provide the personal information we ask for, however, if you choose not to do so, in many cases, we will not be able to provide you with a service or respond to any complaints or enquiries you may have.

Personal information we process about you in dealing with your complaint may include:

- Name
- Address
- Telephone number
- Email address
- What you are complaining about
- What you would like us to do to put things right
- Recordings of any telephone calls
- Special category personal information

## **Lawful bases**

The lawful bases for processing your personal information is “where needed for the performance of a task carried out in the public interest under the laws that apply to us or the exercise of official authority vested in us”.

## **Reasons for processing special category and criminal convictions information**

Some of the information that is collected and shared is classified as special category personal information or personal information consisting of criminal convictions and offences (including alleged offences). This is processed for reasons of substantial public interest under the laws that apply to us, such as where it is necessary for us to fulfil our legal obligations and regulatory requirements. We have a [Data Protection Policy](#) which sets out how this information will be handled.

## **Data sharing**

Your information will be shared with the relevant service department and, where we have outsourced the service, with our external service provider. We may also share your information with a number of other organisations for example Kent County Council, the Ombudsmen (where you have complained to the Ombudsmen and we are asked to provide them with information), and elected Councillors and/or a Member of Parliament.

We rely on a number of exemptions, which allow us to share information without needing to identify a lawful basis for the sharing and without needing to provide information to individuals about the sharing. Please refer to the Kent & Medway Information Agreement for further details on our sharing arrangements.

## **Anonymisation**

Your personal information may be converted ('anonymised') into statistical or aggregated data in such a way that ensures that you cannot be identified from it. Aggregated data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our reports such as showing the number of complaints we receive, but not in a form which identifies anyone.

## **Right to object**

Where processing your personal information is required for the performance of a public interest task (see our lawful bases above), you have the right to object on 'grounds relating to your particular situation'. We will have to demonstrate why it is appropriate for us to continue to use your personal data.

## **Changes to this Privacy Notice**

We review this Privacy Notice regularly and will place updates on our website. Please refer to our [Corporate Privacy Notice](#) for further details of how we process your personal information and for details on your rights.