

Data Protection Complaints Process

v1.1 · Updated Jun 2026 · Reviewed Jun 2026 · Next review Jun 2027

Owner: Andrew James (CEO)

1. Purpose and scope

This document sets out how Halved Limited (Companies House no. 15261677) handles data protection complaints. It has been produced to meet the requirements of section 103 of the Data (Use and Access) Act 2025 (which inserts section 164A into the Data Protection Act 2018), which comes into force on 19 June 2026, and supports compliance with UK GDPR Article 5(2) (accountability). It supplements the complaints section of the Halved Privacy Policy.

This process applies to complaints from any individual whose personal data Halved processes, including students, parents, teachers, school staff, and website visitors. Where Halved acts as data processor for a school, certain complaints will be co-ordinated with the school as controller, as described below.

2. How to make a complaint

If you are unhappy about how Halved has handled your personal data, please contact us using any of the following routes:

- Email: dataprivacy@halved.io
- Post: Data Protection, Halved Limited, 4 Comet House, Calleva Park, Aldermaston, Berkshire, RG7 8JA

Please include your name and contact details, a description of your concern, and any relevant dates or reference numbers. You do not need to use any specific form or format. If you would prefer to use a form, a Data Protection Complaint Form is available on the Halved website and on request from dataprivacy@halved.io.

If you are a student, parent or legal guardian with a question about student data held within the school platform, please contact your school first. Your school is the data controller for student platform data. Halved will assist the school in responding to the complaint.

3. What happens after we receive your complaint

Halved will handle your complaint in the following stages:

- **Acknowledgement.** We will acknowledge receipt of your complaint within 30 days of receiving it. Our acknowledgement will confirm that we have received your complaint and will give you a reference number or contact name.
- **Investigation.** We will investigate your complaint without undue delay. We may contact you to ask for additional information if needed to investigate properly. We will keep you informed of progress.
- **Response.** We will tell you the outcome of our investigation without undue delay. Our response will explain what we found, what action (if any) we have taken or intend to take, and how to escalate to the ICO if you remain unsatisfied.

We will aim to resolve complaints as quickly as possible. If your complaint is complex or requires input from a third party such as your school, we will let you know and keep you updated on timing.

4. School-related complaints (controller co-ordination)

Where Halved acts as a data processor for a school, the school is the data controller for students and school staff platform data. If your complaint concerns data that the school has directed Halved to process, Halved will:

- acknowledge your complaint in line with the timescales in section 3;
- notify the relevant school promptly so that the school, as controller, can assist in responding;
- co-ordinate its response with the school; and
- provide you with a response and, where relevant, direct you to the school's own data protection complaints process or to the school's Data Protection Officer.

You can also contact your school directly. Most schools will have a data protection contact or Data Protection Officer who can assist with complaints about student data. Their contact details should be available from the school.

5. If you are not satisfied with our response

If you are not satisfied with the outcome of your complaint, or if we have not responded within the timeframe above, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection.

- Website: <https://www.ico.org.uk/make-a-complaint/>
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We would always prefer to have the opportunity to address your concern first. Raising your complaint with us directly before escalating to the ICO will usually result in a faster resolution.

6. Complaint records

Halved keeps a record of all data protection complaints received, including the date of receipt, the nature of the complaint, the steps taken to investigate and resolve it, and the outcome. This log is reviewed as part of Halved's data protection governance and compliance activities. Complaint records are retained for a minimum of three years from the date of resolution.

7. Making this process available

This process is published on the Halved website and is referenced in the Halved Privacy Policy. It is written in plain language and is available in alternative formats on request.

Contact dataprivacy@halved.io to request a large-print, audio or other accessible version.

8. Review

This process will be reviewed annually or when data protection requirements change.

Next review: June 2027.

Halved Limited is registered in England and Wales (Companies House no. 15261677).
Registered office: 4 Comet House, Calleva Park, Aldermaston, Berkshire, RG7 8JA.

Questions about data protection? dataprivacy@halved.io

Website halved.io · students log in at my.halved.io

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