

# ABM Data Protection Complaint Policy

## How to raise a concern about your personal data

### 1. INTRODUCTION

The Association of Business Mentors (ABM) takes the protection of your personal data seriously. Where ABM determines how and why personal data is used, ABM is the data controller. If another organisation is the controller, we will help direct or forward your complaint and support that organisation as required. If you believe we have not handled your personal data correctly, you have the right to complain directly to us.

This policy explains how to make a data protection complaint, what happens when you do and the timescales you can expect from us. The statutory complaint-handling duties described here apply to complaints received on or after 19 June 2026.

### 2. YOUR RIGHT TO COMPLAIN

You can make a complaint if you consider that ABM may have infringed the UK GDPR or the Data Protection Act 2018 in connection with personal data about you.

You do not need to use legal terms or prove that an infringement has happened. Please explain what concerns you. A complaint can be about any aspect of data protection, including, but not limited to:

- How we collected your personal data
- How we are using or sharing your data
- The accuracy of the data we hold about you
- How long we are keeping your data
- How securely we have kept your personal data, including concerns about a personal data breach
- A response (or lack of response) to a data subject access request
- How we have handled your data in connection with marketing
- Any other concern about your data protection rights

You can also authorise someone else to make a complaint on your behalf. If you do, we may need to verify that the person has your authority before we can share details with them.

### 3. HOW TO MAKE A COMPLAIN

You can submit a complaint using any of the contact details below. You may also complain through another ABM channel or to any member of staff; we will accept and route the complaint appropriately.

|             |                                                                                        |
|-------------|----------------------------------------------------------------------------------------|
| ONLINE FORM | <a href="#">Data Protection Complaint Form</a>                                         |
| EMAIL       | <a href="mailto:enquiries@theabm.org">enquiries@theabm.org</a>                         |
| TELEPHONE   | 020 8129 7588                                                                          |
| POST        | Data Privacy Manager, Association of Business Mentors, 124 City Road, London, EC1V 2NX |

If you need help making a complaint, a reasonable adjustment or this policy in an alternative format, please contact us using any of the details above.

Providing the following information will help us look into your complaint as quickly as possible:

- Your name and contact details
- A description of what has happened or what you are concerned about
- Any relevant dates, reference numbers or correspondence
- What outcome you are hoping for (if you have one in mind)

### 4. WHAT HAPPENS NEXT

#### 4.1 Acknowledgement

We will acknowledge your complaint as soon as reasonably possible and no later than 30 days after we receive it. The 30 days start on the day after receipt; if the final day falls on a weekend or public holiday, the deadline moves to the next working day. Our acknowledgement will normally include a reference number and the name or role of the person looking into the complaint.

#### 4.2 Investigation

Our investigation starts when we receive the complaint, not after the acknowledgement period.

We will make appropriate enquiries without undue delay. Depending on the circumstances, this may involve reviewing records, speaking to relevant team members or processors, checking our processes and asking you for clarification.

We will keep you informed about progress without undue delay. If we need more time or additional information, we will explain this and provide an updated timeframe where possible.

### 4.3 Outcome

Once we have completed our investigation, we will provide the outcome without undue delay. We will explain clearly:

- What we found
- Whether we have upheld your complaint (in full or in part)
- What action we have taken or plan to take as a result
- Your options if you remain unhappy

We will respond as quickly as reasonably possible, taking account of the complexity of the complaint and the enquiries that are appropriate.

If your complaint also contains an information-rights request, such as a subject access request, or raises a possible personal data breach, we will handle that matter under the relevant procedure and legal timescale in parallel. The 30-day complaint acknowledgement period does not extend the deadline for responding to an information-rights request.

## 5. Verifying Your Identity

If we have reasonable doubts about your identity, we may ask for evidence before sharing personal data or taking action on your behalf. We will ask at the earliest opportunity and only for information that is reasonable and proportionate. If we already have enough information to confirm your identity, we will not ask for more.

If someone else complains on your behalf, we will need suitable evidence that they are authorised to act for you before we discuss personal data with them or act on your instructions.

## 6. IF YOU ARE NOT SATISFIED

### 6.1 Ask us to review our decision

If you feel we have not fully addressed your concerns, please let us know.

Where practicable, a senior person who was not responsible for the original decision will review the complaint. This is a voluntary ABM process and you do not have to use it before complaining to the ICO.

## 6.2 Complain to the ICO

You have the right to complain to the Information Commissioner's Office (ICO), the UK's independent data protection regulator, at any point. The ICO will usually ask whether you have raised the matter with us first, so that we have an opportunity to put things right, but you do not have to wait for an ABM internal review.

|                        |                                                                                           |
|------------------------|-------------------------------------------------------------------------------------------|
| ICO COMPLAINTS WEBSITE | <a href="https://ico.org.uk/make-a-complaint">ico.org.uk/make-a-complaint</a>             |
| ICO HELPLINE           | 0303 123 1113                                                                             |
| ICO ADDRESS            | Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF |

## 7. How We Use Your Complaint Data

When you make a complaint, we will process personal data as necessary to receive, investigate, record and respond to it. Our primary lawful basis is compliance with our legal obligation under section 164A of the Data Protection Act 2018. Other lawful bases and additional conditions may apply where the complaint includes matters outside that duty or special category or criminal-offence data.

We will only collect information that is necessary and will restrict access to people who need it. We will keep complaint records only for as long as necessary for compliance, legal, operational and improvement purposes, in line with our retention arrangements. Further details are in the [ABM Privacy Policy](#).

## 8. Unacceptable Behaviour

We will treat complainants fairly and with respect and ask for the same in return. If contact is abusive, threatening or creates a safety risk, we may set reasonable and proportionate limits on the method or frequency of communication.

Any such limits will not prevent us from accepting, recording or appropriately investigating the complaint, keeping the complainant informed, or communicating the outcome as required by law. We will explain any limits and consider reasonable adjustments.

## 9. Review of This Policy

This policy was last reviewed in August 2026. ABM will review it at least annually and sooner if the law, ICO guidance or our business practices change.

### DOCUMENT CONTROL

| VERSION | DATE        | CHANGES                                                                     |
|---------|-------------|-----------------------------------------------------------------------------|
| 1.0     | August 2026 | ABM version updated for section 164A commencement and current ICO guidance. |

This ABM policy reflects section 164A of the Data Protection Act 2018, inserted by the Data (Use and Access) Act 2025 and in force for complaints received on or after 19 June 2026. It is an organisational policy and does not constitute legal advice.