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	Document Classification:	Internal
	Effective Date	10 June 2024
HANDLING COMPLAINTS & QUERIES	Doc No	DPMP-PRO-02
	Revision	1.0

AMENDMENTS LOG

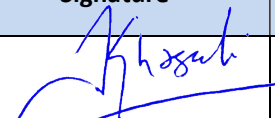
Revision History

Version	Date	Revision Author	Summary of Changes
1.0	10 June 2024	Edwin Soedarta DPO	First Release

Distribution

Name	Location
<i>All employees</i>	<i>Shared Folder</i>

Review & Approval

Name	Position	Signature	Date
Khasali M	Director		10 June 2024

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PURPOSE

The purpose of the procedure is to set out the process for receiving and responding to queries or complaints that may arise with respect to the organization’s collection, use or disclosure of personal data.

SCOPE

This procedure applies to complaints and queries received relating to the organization’s management of personal data.

DEFINITIONS

Query	Query on the organizations policies and practices with respect to management of personal data.
Complaint	Verbal or written complaint on inappropriate handling or mismanagement of personal data.

RESPONSIBILITIES AND AUTHORITIES

The Management has the prime responsibility and approval authority for this procedure.

The Data Protection Officer (“DPO”) together with the respective process owners are responsible to assess, investigate, respond, and take corrective actions to address queries or complaints.

PROCEDURE

1. The DPO contact details shall be made available publicly in the company’s website and in the applicable notices for individuals to know how they can contact the organization if they have any queries or complaints.
2. Handling of queries
 - 2.1 Queries about personal data will normally be received through the DPO contact details. In case a query about personal data is received by another staff, the staff shall forward the query to the DPO.

Note: Queries about personal particulars may be directed to HR-in-charge. HR may consult DPO in case of doubts.
 - 2.2 Depending on the type of the query, the DPO may need to verify the identity of the sender

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within 3 business days by asking through phone call or email their particulars and its current or past relationship with the organization for the DPO to understand the context behind the query to appropriately respond and take actions to address the query.

- 2.3 The DPO shall officially respond to the sender via email within 5 business days to acknowledge the query received. The response shall include that the organization will attend to such queries and will contact the sender to provide updates within 10 business days on the same channel where the query was received unless the sender provides another contact details.
- 2.4 For general queries about information on the organization's policies and practices, verification of identity may not be necessary and the DPO shall officially respond to the sender via email within 5 business days to provide the sender with the necessary information to close the query.
- 2.5 The DPO shall log all queries received, responses and status in the DPMP-PRO-02-F2 PD Complaints & Queries Monitoring Log. Records shall be kept within 30 days upon closure of the queries unless a notice of review has been received from PDPC which will require the records to be retained after the review has been completed. After which, the records will be disposed of in line with the DPMP-PRO-08 Data Retention & Destruction Process.

3. Handling of complaints

- 3.1 Complaints about personal data will normally be received through the DPO contact details. In case a complaint about personal data is received by another staff, the staff shall forward the complaint to the DPO.
- 3.2 The DPO shall verify the authenticity of the complaint via phone call or email verification and the identity of the sender and its current or past relationship with the organization within 3 business days. If the sender is acting on behalf of the complainant, documentation proving the authority to act on behalf of the complainant will be requested.
- 3.3 The DPO shall officially respond to the sender / complainant via email within 5 business days to acknowledge the complaint received. The response shall include that the organization will investigate and revert within 30 calendar days via email.
- 3.4 The DPO shall initially fill the DPMP-PRO-02-F1 Personal Data Complaint and Action Form based on the information available and results of verification and attach the filled form when sending the acknowledgement of the complaint received to the sender.
- 3.5 The DPO shall register the case to the DPMP-PRO-02-F2 PD Complaints & Queries Monitoring Log.

Whereas,
 YYYY – Year e.g., 2022
 MM – Month, 01

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CRN – Case Reference No.

XXXX –Running number e.g., CC0001, CC0002, CC0003.... etc.

- 3.6 DPO shall assess the nature of the complaint received and determine the right process owner to address the complaint.
- 3.7 The responsible person in consultation with the DPO shall investigate the complaint and identify the root cause so appropriate corrective actions can be determined within 10 business days.
- 3.8 DPO shall evaluate the correction action is appropriate and ensure that actions are taken timely by the responsible personnel and verify its effectiveness to prevent recurrence of the problem.
- 3.9 DPO shall update the complainant within 30 calendar days on the status and actions taken, and complete Part B of DPMP-PRO-02-F1 Personal Data Complaint and Action Form.
- 3.10 DPO shall log all complaints received, responses and status in the DPMP-PRO-02-F2 PD Complaints & Queries Monitoring Log. Records shall be kept within 30 days upon closure of the complaints unless a notice of review has been received from PDPC which will require the records to be retained after the review has been completed. After which, the records will be disposed of in line with the DPMP-PRO-08 Data Retention & Destruction Process.

FORMS

DPMP-PRO-02-F1 Personal Data Complaint and Action Form
DPMP-PRO-02-F2 PD Complaints & Queries Monitoring Log

ANNEX

Annex A Process Flow for Handling Complaints & Queries

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ANNEX A: PROCESS FLOW FOR HANDLING QUERIES AND COMPLAINTS

