
Complaint Handling Procedure

This Complaint Handling Procedure (the "Procedure") addresses complaints from Data Subject(s) related to the Processing of their Personal Data, carried out by OSF under the OSF Processor BCRs, for the cases when OSF processes Personal Data on behalf of a Customer/Controller.

All complaints regarding OSF Entities' Processing of Personal Data on behalf of Controllers will be handled in line with the Procedure set out below.

The focus of any compliant response plan is on protecting Data Subjects and their Personal Data, together with business' critical assets and data.

In order to allow OSF to deal promptly and in the most efficient manner with a complaint regarding the Processing carried out by OSF, Data Subject is invited to follow the following steps:

STEP 1: Any complaint of a Data Subject regarding the Processing of Personal Data carried out by OSF, as Processor, should be addressed directly to the Data Protection Officer via e-mail at dataprotection@osf.digital. Also, any such Data Subject complaint received by an OSF Entity will be immediately forwarded to the Data Protection Officer at the e-mail address mentioned above. All Employees are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Data Protection Officer, who is responsible for dealing with all complaints in line with this procedure.

STEP 2: OSF will acknowledge the complaint within five (5) days of receipt. Investigation of the complaint by the DPO will then proceed.

STEP 3: The complaint of Data Subject will be treated confidentially and fully investigated in order to identify all the required information. During this process, additional communication with the Data Subject might be required. Data Protection Officer will deal with the complaints asking the support of the relevant business and support functions within OSF.

STEP 4: Considering that the complaint of the Data Subject is related to the Processing of Personal Data carried out by OSF, as Processor, OSF will promptly communicate the details of the received complaint to the Customer/Controller and will act in accordance with the terms of the MSA, SOW and/ or DPAA concluded between the Customer and OSF, according to GDPR provisions.

A decision on any complaint made will be communicated to the Data Subject within one (1) month of the complaint being made. Due to the complexity and number of complaints, the term for response may be extended by up to two (2) further months, and OSF will inform the Data Subject accordingly, providing the Data Subject with the reasoning behind delaying the response to the complaint.

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OSF may reject the submitted complaint (and in such case, OSF will inform the Data Subject within one (1) month of the complaint being made):

- a. Where the Controller instructs the OSF Entity not to deal with the received complaint directly
- b. If the refusal to respond to the complaint is consistent with the EU/EEA data protection law within the jurisdiction in which the relevant OSF Entity is located, or
- c. Where the Data Subject complaint is not subject to the EU/EEA data protection law

OSF will inform the Data Subject within its decision on the received complaint that the Data Subject has the right to complain to the competent Supervisory Authority and/or to lodge a claim with a court of competent jurisdiction, including when the Data Subject is not satisfied with the way in which his or her complaint has been resolved by OSF and the steps that Data Subject may follow in such case.

The Data Subject has the right to lodge a complaint with a Supervisory Authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the Data Subject considers that the Processing of Personal Data carried out by OSF infringes the GDPR provisions. Also, the Data Subject has the right to bring the proceedings against OSF before the courts of the Member State where the OSF Entity, as a Data Exporter, has an establishment, or where the Data Subject has his or her habitual residence.

OSF shall keep a written log of complaints received and actions taken, and decisions reached in a data protection complaint inventory. This shall consist of an adequate record to be retained of a case, any reporting to the Supervisory Authority, action taken by OSF and action/conclusion required by the Supervisory Authority (if any).

The Data Protection Officer is the owner of the OSF's data protection complaint inventory and is responsible for ensuring that this Procedure is reviewed from time to time, as necessary, or considering the high number of complaints received during certain period of time (e.g. one year).

The Data Protection Officer will elaborate periodically (e.g. once a year) a report describing the received complaints of Data Subjects, the object of these complaints, as well as the complaints solving status, and will present such report to OSF's Top Management.

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**MODIFICATION/REVISION REGISTRATION FOR: "Complaint Handling Procedure where OSF acts as a Data Processor",
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