



Institute
and Faculty
of Actuaries

IFoA Data Protection Complaints Procedure

v1 2025

1. Scope of the IFoA Data Protection Complaints Procedure

- 1.1 This procedure explains the process which is followed when you wish to raise a concern about how the IFoA has handled your personal data.
- 1.2 Examples of concerns that would fall under the Data Protection Complaints Procedure include:
 - You are unhappy with how the IFoA has responded to a data subject rights request such as subject access or erasure.
 - You have been impacted by a data breach.
 - You are concerned about how the IFoA has used your personal data.

2. Raising a data protection concern with the IFoA

- 2.1 In the first instance, we encourage an informal resolution is sought before making a formal complaint. This may be done by contacting the IFoA Data Protection Officer (DPO) to express your concerns. It may be that an informal discussion resolves the matter without further action.
- 2.2 If you are unable to resolve your concerns informally or you feel that the matter is more serious, you can make a formal complaint using this procedure.

3. How to make a complaint under this procedure

- 3.1 To make a complaint contact our DPO with your concerns by email at data.protection@actuaries.org.uk If you consider it inappropriate for the DPO to receive your complaint because it is about them you can send your concerns to the Corporate Secretary at corpsec@actuaries.org.uk for the attention of the IFoA Chief Executive Officer (CEO).
- 3.2 You should provide as much information as you can:
 - a) The nature of your concern or of the issue to be reported;
 - b) Your reason(s) for believing that what you are reporting is an issue;
 - c) The impact on you;
 - d) Whether any action has already been taken by anyone; and
 - e) Any steps you have taken to attempt to resolve the matter.

Generally, the earlier you express your concern and the more detail you are able to provide the easier it is to take action.

- 3.3 We may ask you for information confirming your identity, if we need this we will ask for it at the outset.
- 3.4 You may instruct a third party to make a complaint on your behalf. For this to happen they will have to have your clear consent to do so and provide evidence of this when raising your concern.

- 3.5 Please be aware that any material or documentation which is submitted or created in the course of managing your complaint may be shared in the context of other processes as considered necessary or appropriate by the IFoA.

4. What happens next

- 4.1 When your complaint is received an appropriate representative of the IFoA will be appointed to deal with your concern. An “appropriate representative” of the IFoA will be someone who is of appropriate seniority, is impartial and has had no material prior involvement in the concern you have raised.
- 4.2 As your complaint is being made under the Data Protection Complaints Procedure the IFoA representative investigating your complaint will, by default, be the DPO. If there is a reason the DPO cannot investigate, for example if your concern is about them or the way they have acted, then the CEO will appoint another person of seniority to manage your complaint.
- 4.3 The IFoA representative will contact you with an acknowledgement within 10 working days of receiving your complaint. Depending on the nature of your concern, it may be that you are able to resolve the matter after a further discussion with the IFoA representative.

5. Formal complaints: investigation and outcome

- 5.1 If a formal complaint is registered there will be an initial assessment to determine the scope of any investigation which may need to take place. As part of the investigation you may be asked to provide further information, this may be in the form of correspondence, documents or orally in a meeting.
- 5.2 In some cases we may appoint an independent investigator or team of investigators (this may include internal auditors) including persons with relevant experience of investigations or specialist knowledge in data protection law or information security.
- 5.3 We will aim to keep you informed of the progress of the investigation of your complaint and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or of all actions taken as a result. You should treat any information about the investigation and its outcome as confidential.
- 5.4 We will advise you of the outcome of the investigation and any actions we have taken or are planning to take as a result of your complaint without undue delay.

6. If you are not satisfied

- 6.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way.
- 6.2 If you are unhappy with the outcome of our investigation or with the way your concern was handled you have the right to make a complaint to a Supervisory Authority about how we process your personal data. In the United Kingdom the Supervisory Authority is the [Information Commissioner's Office](#)

Version Control

Version	Date	Author/Revised by	Notes/Revisions
1	September 2025	Data Protection Officer	<ul style="list-style-type: none">New Procedure as per Information Commissioner's Office guidance on the Data Use and Access Act (2025)
Review interval: Every 2 years		Last reviewed: September 2025	