



Protecting Workforces Worldwide

Data Handling and Complaints Process

Stronghold Global Limited

PUBLIC

Document Control

Document Name	Data Handling and Complaints Process
Document Author	George Harris - DPO
Document Date	02 September 2026
Document Version	V0.1
Document Approver	TBC
Classification	Public
Review Cycle	Annual and after material legal, regulatory, processing, system or organisational change

Approval status. This is a review draft. It must be checked against actual operations and approved by the named approver before issue or publication.

Contents

1. Purpose and Status 4

2. Scope.....4

3. Legal and Regulatory Framework 4

4. How to Complain.....4

5. What We Will Do.....4

6. Identity and Representatives 5

7. Related Requests 5

8. Outcome and Escalation.....5

9. Internal Records.....5

1. Purpose and Status

This public-facing process explains how people can raise concerns about Stronghold Global's handling of personal data and how the organisation will acknowledge, investigate, update and respond.

This document is a controlled review draft. It becomes operative only after organisational review and approval.

2. Scope

This document applies to Stronghold Global Limited, trading as Stronghold Global, and to employees, workers, contractors and others acting on its behalf.

The operational scope includes the Stronghold Global website, the Stronghold App and Smarter Service Portal, a customer relationship management service, Google Analytics and Google Ads, Google reCAPTCHA, LinkedIn, Stripe, YouTube or embedded content, WordPress and PHP components, internal company IT and software, email and telephone support, and an automated spam-detection service.

3. Legal and Regulatory Framework

This document is governed by the UK General Data Protection Regulation, the Data Protection Act 2018 as amended, the Data (Use and Access) Act 2025, and the Privacy and Electronic Communications Regulations 2003 where applicable. The EU GDPR applies where Stronghold Global offers goods or services to, or monitors, individuals in the EEA. Other employment, tax, health and safety, corporate, limitation and communications laws apply to particular records and activities.

Legal duties are expressed as mandatory requirements. Controls described as recommended or good practice support accountability but do not replace a documented assessment of the facts.

4. How to Complain

You can complain by emailing info@dataprivacyservices.co.uk, calling +44 (0)1793 484237, or writing to Stronghold Global Limited, 3 Radway Road, Britannia Trade Park, Swindon, Wiltshire, SN3 4ND, United Kingdom. You do not need to cite a law or use a form. Please describe what happened, the data or service involved, relevant dates and the outcome you seek. Do not send unnecessary identity documents or special-category information.

5. What We Will Do

Record the complaint and protect the information provided.

Acknowledge receipt within 30 days. Investigation begins on receipt and is not postponed until acknowledgement.

Clarify the concern and desired outcome where needed, and make appropriate enquiries fairly and accurately.

Keep you informed if the investigation continues for a material period.

Provide the outcome without undue delay, explain the decision and identify action taken or reasons for no action.

Record learning, corrective actions and any linked rights request or incident under its separate legal timetable.

6. Identity and Representatives

We ask for identity or authority evidence only where proportionate to the risk. A representative should provide evidence that they may act for the person. We will not use identity checks to obstruct a complaint.

7. Related Requests

A complaint, data-subject request, customer-service dispute, grievance or incident may overlap, but each follows its own rules and deadline. We will identify and coordinate each route rather than treating one response as satisfying all duties.

8. Outcome and Escalation

The DPO reviews material or contested outcomes. If you remain dissatisfied, you may complain to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>. You may also seek a judicial remedy. This process does not restrict those rights.

9. Internal Records

Stronghold records receipt, acknowledgement, evidence, enquiries, communications, decision, outcome and corrective action. Access is restricted and records are retained according to the retention schedule. Complaint trends are reviewed for systemic issues.

The DPO shall maintain an accessible electronic complaint route, internal case-management record, investigation ownership, update cadence and service targets.