

**DATA PROTECTION GOVERNANCE DOCUMENTS****ELA'S MANAGEMENT OF DATA SUBJECTS COMPLAINTS PROCEDURE****1. Scope**

This procedure addresses complaints from data subject(s) related to the processing of their personal data, the manner in which Epure, Lizac si Asociatii SCA ("ELA") handles such requests, and appeals from data subjects on how complaints have been handled.

**2. Responsibilities**

- 2.1 All employees of ELA are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Managing Partner.
- 2.2 The Managing Partner is responsible for dealing with all complaints in line with this procedure.

**3. Procedure**

- 3.1 ELA has the contact details of its Managing Partner published on its website [www.epure-lizac.ro](http://www.epure-lizac.ro), clearly under the **Contact us** section.
- 3.2 ELA has clear indications on its website (the **Contact us** section), that enable the data subject to lodge a complaint.
- 3.3 ELA clearly provides data subject(s) with the Privacy Notice, by publishing it on its website [www.epure-lizac.ro](http://www.epure-lizac.ro), under the **Data Protection** section, which indicates how it deals with data subject complaints and how such complaints could be sent.
- 3.4 Data subjects are able to complain to ELA about:
  - 3.4.1 how their personal data has been processed,
  - 3.4.2 how their request for access to data has been handled,
  - 3.4.3 how their complaint has been handled,
  - 3.4.4 appeal against any decision made following a complaint.
- 3.5 Data subject(s) lodging a complaint with ELA's Managing Partner are able to do so by using the **Contact us** window on ELA's website and/or by e-mail to the Managing Partner as published on ELA's website (**Contact us** section).
  - 3.5.1 All complaints are directed to the Managing Partner for resolution.
  - 3.5.2 Complaints are to be resolved within one month since receipt.
  - 3.5.3 Appeals on the handling of complaints are to be resolved within one month since receipt.
- 3.6 If ELA fails to act on a data subject's access request within one month, or refuses the request, it shall set out in clear and plain language the reasons it took no action. ELA will also inform the data subject(s) of their right to complain directly to the supervisory authority. In doing so, ELA shall provide data subject(s) with the contact details of the supervisory authority and shall inform them of their right to seek judicial remedy.

***Document Owner and Approval***

The Managing Partner is the owner of this document and shall ensure that it is kept up to date. A current version of this document is available to all members of staff on ELA's website on page "Data Protection", section "Policies & Procedures". This policy was approved by Decision of Partners on 15.02.2018 and is issued under the signature of the Managing Partner.

Signature: Doru Epure – Managing Partner

Date: 15.02.2018