



Data Protection Complaints Procedure February 2026

What is a data protection complaint?

If you think that we have not complied with data protection legislation because of the way we have handled your personal information (or the personal information of someone you're acting on behalf of), you can complain to us. You don't need to use legal terms or quote sections of the legislation.

For example, a complaint might be about:

- The way we've responded to a request you have made about the personal information we hold about you (a subject access request or other rights request);
- The security measures we have used to store your information, for example where you have been impacted by a data breach;
- How we have collected or used your personal information, for example where we've stored it, how long we've kept it, or its accuracy; or
- Any other incident or issue that you believe does not comply with data protection legislation.

If we're not sure whether you have made a data protection complaint, we will ask you to clarify.

How to complain

If you want to make a data protection complaint you should complete the online form by [clicking here](#). Alternatively you can email us at info@swa.org.uk or write to us at:

The Scotch Whisky Association
Quartermile Two
2 Lister Square
Edinburgh
EH3 9GL

If you make an informal complaint through social media, we will ask you for alternative contact methods as responding on social media is not a secure way of providing information.

You should provide as much information as possible about your complaint, including:

- whether the complaint is about your information or if you are complaining on behalf of someone else;
- if complaining on behalf of someone else, their name and your relationship to them;
- how you would like to be contacted when we respond to your complaint;
- what type of information is involved;
- detailed information about what happened and when it happened;
- how and when you discovered the issue; and
- what you would like to happen as a result of your complaint

If you have any evidence or supporting information about your complaint you should supply this along with your complaint. The online form will enable you to upload documents or other evidence. If necessary we may contact you to clarify what you are complaining about.

What will happen once we receive your complaint

If necessary, we may ask you to confirm your identity, or proof of authority if you are complaining on behalf of someone else, before we respond to your complaint.

We will acknowledge your complaint within 30 days of receiving it.

As soon as we receive your complaint we will begin investigating it. This will involve gathering as much information as possible and looking at the relevant facts thoroughly, fairly and accurately. We may speak to relevant members of staff, check we've complied with this procedure, and compare the information we hold with the information you hold.

We do not have a set time frame for responding to complaints but will respond without an unjustifiable or excessive delay. We will keep you informed of the progress of your complaint as appropriate, particularly if the investigation is likely to take some time. The time it takes us to investigate is likely to be impacted by:

- the complexity of the issue;
- the scale of the issue (for example if it relates to one, recent incident or issue, or a number of incidents or issues over a longer period of time); and
- any harm that you are suffering as a result of the unresolved issue

Once we have investigated your complaint we will respond to you to explain what we have found, and what action we will take. If we are able to investigate your complaint within 30 days of receiving it, you may receive an acknowledgement of your complaint at the same time as we tell you about the outcome of the investigation.

We will keep a record of your complaint, including the date we received it, our acknowledgement, any relevant conversations or documents, the outcome and any actions we take as a result of the investigation.

What might the outcome of my complaint be?

The outcome of your complaint will depend on the nature of the issue, what we have found in our investigation and what you have told us you would like to happen.

We will clearly explain what we've done to resolve your complaint and, where appropriate, any actions we have taken as a result.

Potential outcomes could include (but are not limited to) one or more of the following:

- an apology;
- a change to our systems, policies or procedures;
- a correction to the information we hold about you; or
- confirmation that we have complied with data protection legislation in the circumstances and therefore won't take any action

We will send you a response which explains what we have done to investigate and resolve your complaint, and any actions we have taken. If we believe we have complied with data protection legislation, we will explain this in detail. If there is appropriate evidence to support our decision we will provide you with this.

We will also review what has happened in order to consider whether there is anything we can learn or improve on to prevent future complaints.

What if I am not satisfied with the outcome of my complaint?

If you are not satisfied with the outcome of your complaint, you should contact us. We may be able to provide more detail or clarify our decision and will do this without undue delay.

You may complain to the Information Commissioner about us. You can do this in the following ways:

Online: <https://ico.org.uk/make-a-complaint/data-protection-complaints/>
By phone: 0303 123 1113
By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

The Information Commissioner can only deal with complaints about data protection. If the complaint relates to any other legislation or regulatory framework, they won't be able to help.