

Amati Global Investors Data Protection Complaints Procedure

1. Purpose

This procedure sets out how Amati Global Investors (“Amati”) handles complaints relating to the processing of personal data, including alleged breaches of data protection legislation or failures to comply with individuals’ data protection rights.

Amati is committed to handling personal data lawfully, fairly and transparently, and to dealing with complaints promptly and effectively.

2. Scope

This procedure applies to:

- All personal data processed by the Firm
- Complaints made by clients, investors, employees, former employees, contractors, suppliers, or other individuals
- Complaints relating to misuse or loss of personal data, unauthorised access or disclosure, failure to comply with data subject rights, data accuracy or retention concerns

3. Responsibility

Overall responsibility for data protection complaints rests with the Data Protection Officer.

All staff are responsible for identifying potential data protection complaints and escalating them promptly.

4. What is a Data Protection Complaint?

A data protection complaint is any expression of dissatisfaction relating to how Amati processes personal data, whether made verbally or in writing.

5. How Complaints May Be Made

Complaints may be made to Amati in writing¹ or verbally². All complaints must be referred immediately to the Data Protection Officer.

6. Complaint Handling Process

Acknowledgement:

Amati will acknowledge receipt promptly and in any event within five business days.

Investigation:

The Data Protection Officer will review the complaint, gather information, and assess compliance with applicable data protection legislation.

Response:

Amati will aim to respond within one month. Where necessary, this may be extended by up to two further months in line with UK GDPR requirements.

7. Remedies and Redress

Where a complaint is upheld, Amati will take appropriate remedial action, including correction or deletion of data, procedural improvements, or staff training.

8. Escalation to the Information Commissioner's Office ("ICO")

If dissatisfied with Amati's response, the complainant may raise the matter with the ICO.

9. Record Keeping

Amati will maintain records of all complaints and actions taken in accordance with its data retention policy.

10. Financial Conduct Authority ("FCA") Considerations

Where relevant, Amati will consider whether FCA notification or escalation is required.

11. Review

This procedure will be reviewed annually and following any material data protection incident.

¹ Complaints in writing should be addressed to: The Data Protection Officer, Amati Global Investors Limited, 8 Coates Crescent, Edinburgh, EH3 7AL or sent by email to dpo@amatiglobal.com

² Verbal complaints should be made by telephone to 0131-503-9100