

# Complaints procedure

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## Introduction

NFIR B.V. (hereafter: NFIR) NFIR B.V. hereafter: NFIR) operates strictly in accordance with the Privacy Code of Conduct for Private Investigation Agencies of the Security Sector Association of the Netherlands [Nederlandse Veiligheidsbranche] and is subject to the Dutch Data Protection Authority [Autoriteit Persoonsgegevens or AP]. If you have a complaint about NFIR, you can submit it in writing. NFIR's complaints procedure is in accordance with article 18 (establishment of a complaints procedure) of the Private Security Organizations and Detective Agencies Regulations [Regeling Particuliere Beveiligingsorganisaties en Recherchebureaus]. Complaints are taken very seriously by NFIR and dealt with confidentially, which means that any communication about a complaint is only conducted between the parties involved. No costs are involved in the submission of a complaint to, and its handling by, NFIR. Any costs incurred by the complainant in making their submission cannot be claimed from NFIR via this procedure.

NFIR distinguishes between complaints about (1) the quality of service and (2) about NFIR acting as a private investigation agency within the meaning of the WPBR. In both cases, a customer of NFIR may report the complaint to klachten@nfir.nl. All complaints are recorded in a complaint register for improvement purposes. In the case of a complaint about the quality of service, the relevant employee of google will first try to resolve the complaint himself and/or solve the underlying problem. If this is not sufficient, the employee will point out the possibility of filing a complaint with NFIR according to the complaint procedure below. For complaints about NFIR acting as a private investigation agency within the meaning of the WPBR, the complaint procedure below will always be followed immediately.

## Objective

NFIR's objective is to conduct adequate complaint handling so that:

- A. The requirements of the Private Security Organizations and Detective Agencies Regulations are met;
- B. The customer is central to the handling of the complaint;
- C. Complaints contribute optimally to improving the quality of our services.

## Definition of complaint and complainant

The definition of a complaint is the formal expression of dissatisfaction with a service provided or treatment experienced by the complainant in contact with NFIR. Examples of complaints within the scope of this procedure include the provision of incorrect information, delays in dealing with a request for information, etc., as seen from the perspective of the complainant. The complainant is a client or their representative who expresses a complaint

A complaint can be recognized by:

- The word 'complaint' or a synonym is used
- The client or prospect expresses their disagreement with something in strong terms
- NFIR or one of its employees are accused of a certain action or omission
- One or more of NFIR's employees are accused of certain behavior

Complaints which are not regarded as complaints within the scope of this procedure:

- Complaints regarding recommendations in reports<sup>1</sup>

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<sup>1</sup> These complaints are excluded because recommendations in reports are based on research which is a snapshot in time. These recommendations are based on the limited information obtained at the time of the investigation and therefore no rights can be derived from them.

## Requirements of a complaint

The written complaint must contain at least:

- A. Name, (email)address complainant;
- B. Date;
- C. Project name and number of NFIR to which the complaint relates (if applicable);
- D. Description of the behavior and/or service giving rise to the complaint;
- E. The grounds on which the complainant is making their complaint

## Responsibilities and authority

Senior management is responsible for:

1. Dealing with complaints
2. Analyzing complaints
3. Acting on complaints

## Procedure for the handling of a complaint

### Filing a complaint

A complaint must be submitted in writing within six weeks from the date on which the subject of the complaint has taken place. The complaint must be submitted to:

[klachten@nfir.nl](mailto:klachten@nfir.nl)

Or

NFIR B.V.  
FAO NFIR Complaints  
Laan van Zuid Hoorn 165  
2289 DD Rijswijk

### Handling a complaint

Senior management assesses the complaint and confirms that it is being dealt with by means of a letter or e-mail addressed to the complainant within 14 working days of its arrival. The complaint will be investigated by senior management and the complainant and the employee or employees in question may be consulted. They will also determine their position in respect of the complaint within 30 working days of its submission and the complainant will be informed in writing. In respect of the complaint, an attempt will initially be made to mediate. If this is unsuccessful, an independent committee will be involved. Any complaint received about NFIR acting as a private investigation agency within the meaning of the WPBR will be brought to the Minister of Security and Justice, who receives a copy of the complaint

### Complaint analysis

Complaints are archived by NFIR for 5 years if the complaint relates to an (investigative) report. Other complaints are anonymized after resolution and kept for 2 years. Periodically, at least once a year, the management inventories the complaints submitted. If trends can be observed, steps are taken to prevent such complaints in the future.

## Version management

| Version | Name              | Date       | Changes from previous version   | Approved by         |
|---------|-------------------|------------|---|---------------------|
| 1.0     | Setup of BPOB     | 24-12-2018 | -   | Arwi van der Sluijs |
| 1.1     | Verena Hoogerwerf | 07-09-2023 | New formatting applied to the document. Textual adjustments. Addition of route outside Privacy Code of Conduct sector Private Research Agencies and adjustment of definition. Adjustments following comments from FG. | Arwi van der Sluijs |
| 1.2     | Verena Hoogerwerf | 07-12-2023 | Change of address   | -                   |