

Grievance Procedure

Purpose

MyPup is committed to ethical business practices and stakeholder engagement. This policy ensures that employees and external stakeholders have a safe, transparent, and accessible mechanism to raise concerns and seek resolutions, in line with B Corp standards.

Further notes

Annual summary of grievances and resolutions published in Impact Report and presented annually in MT meeting.

All grievances are recorded after investigation by the COO and kept internally.

Grievance Procedure for external stakeholders

MyPup is committed to ethical business practices and stakeholder engagement. This policy ensures that external stakeholders have a safe, transparent, and accessible mechanism to raise concerns and seek resolutions.

NOTE: this policy is for grievance only. If you are looking for help related to your MyPup account, please contact our customer service department:

[NL +31 \(0\)85 001 37 17](tel:+3120850013717)

GB [+44 \(0\)20 396 053 73](tel:+442039605373)

[IE +353 \(0\)12 338 220](tel:+353212338220)

 info@my-pup.com

Scope

This policy applies to all stakeholders: Customers, suppliers, partners, MyPup users, Employees, interns.

Grievances may relate to:

- Breach of company policies or ethical standards
- Environmental or social impact concerns
- Discrimination, harassment, or bullying

- Any other issue affecting stakeholders

Formal procedure

To submit a grievance, send an email to grievance@my-pup.com. We will review and acknowledge the issue internally within **3 working days**.

Submission must include:

- Description of the problem with relevant details and evidence
- Desired resolution

Within **10 working days**, we will conduct an investigation together with ArboVita and come back with findings and actions.

All grievances are recorded and tracked in our secure system. Annually, all grievances will be reviewed within the Management Team and included in our Impact Report.

MYPUP

PRIVACY NOTICE FOR THE COMPLAINTS PROCEDURE

Document Classification: Internal & External

Document Owner: Operations Director

Policy Sponsor: Management Board

Version: 2.0

Status: Approved

Effective Date: October 05, 2026

Review Frequency: Annual

Next Review Date: July 01, 2027

Related Standards: GDPR, ISO/IEC 27001

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EXECUTIVE SUMMARY

Purpose

This Privacy Notice establishes the framework governing the processing of personal data received through the MyPup Complaints Procedure.

The Notice explains how personal data is collected, used, stored, secured, shared, retained, and disposed of throughout the investigation and resolution of complaints. It supports MyPup's commitment to transparency, accountability, information security, and compliance with the General Data Protection Regulation (GDPR) and ISO/IEC 27001 principles.

Scope

This Notice applies to all complaints, grievances, objections, appeals, and related investigations submitted by customers, clients, suppliers, business partners, contractors, and other stakeholders where personal data is processed by MyPup.

Objectives

The objectives of this Notice are to:

- Protect the rights and freedoms of data subjects.
- Ensure lawful and transparent processing of personal data.
- Define clear roles and responsibilities.
- Protect the confidentiality, integrity, and availability of complaint-related information.
- Support effective complaint handling and continuous improvement.
- Establish appropriate controls for retention and disposal of records.
- Demonstrate compliance with privacy and information security requirements.

Information Security Commitment

MyPup recognizes that complaint records may contain confidential, commercially sensitive, and personal information. Complaint records are therefore protected through technical and organizational safeguards operating within MyPup's Information Security Management System (ISMS) in alignment with ISO/IEC 27001.

Governance Statement

Responsibility for this Notice rests with the Operations Director. All employees, contractors, managers, Complaint Officers, and information security personnel are responsible for complying

with this Notice and supporting the protection of personal data throughout the complaints process.

Data Subject Rights

MyPup is committed to facilitating the exercise of data subject rights under applicable data protection laws, including rights of access, rectification, erasure, restriction, portability, and objection.

1. PURPOSE

The purpose of this Privacy Notice is to ensure that personal data processed through the MyPup Complaints Procedure is handled lawfully, fairly, transparently, securely, and in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR).

This Notice establishes governance requirements, responsibilities, and controls relating to complaint-related processing activities.

2. DATA CONTROLLER

MyPup acts as the Data Controller for personal data processed under the Complaints Procedure.

Contact Information

Primary Contact

grievance@my-pup.com

Questions, requests, or concerns relating to personal data may be directed to either contact address.

3. SCOPE

This Notice applies to all personal data processed by MyPup in relation to:

- Complaints;
- Grievances;
- Appeals;
- Objections;
- Complaint investigations;

- Complaint records;
- Related information security matters.

This Notice applies regardless of the communication channel used for submitting the complaint.

4. DEFINITIONS

Complaint

A written expression of dissatisfaction regarding a service, activity, communication, employee action, business process, product, decision, or conduct of MyPup for which a response or resolution is requested.

Complainant

Any individual or organization submitting a complaint to MyPup.

Personal Data

Any information relating to an identified or identifiable natural person.

Data Subject

The individual to whom personal data relates.

Processing

Any operation performed on personal data including collection, recording, storage, organization, use, disclosure, transfer, deletion, or destruction.

Complaint Record

Any complaint-related correspondence, form, email, document, report, note, decision, attachment, or evidence.

Information Security Incident

An event which may compromise the confidentiality, integrity, or availability of data, systems, services, or information assets.

5. ROLES AND RESPONSIBILITIES

5.1 Chief Business Support

The CBS shall:

- Own and maintain this Notice.
- Review compliance requirements.
- Oversee complaint governance.
- Monitor implementation and effectiveness.
- Approve corrective and preventive actions.
- Ensure adequate resources are available.

5.2 Complaint Officer

The Complaint Officer shall:

- Register complaints.
- Maintain complaint records.
- Coordinate investigations.
- Communicate with complainants.
- Monitor complaint timelines.
- Escalate significant issues where required.

5.3 Managers

Managers shall:

- Support investigations.
- Implement corrective measures.
- Ensure compliance within their teams.
- Promote awareness of privacy obligations.

5.4 Employees and Contractors

Employees and contractors shall:

- Protect personal data.

- Maintain confidentiality.
- Follow applicable procedures.
- Report suspected privacy or security incidents.

5.5 Information Security Function

The Information Security function shall:

- Assess security risks.
 - Support investigations.
 - Manage security incidents.
 - Recommend corrective actions.
 - Support GDPR and ISO/IEC 27001 compliance.
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6. PRIVACY PRINCIPLES

MyPup processes personal data in accordance with the following principles:

- Lawfulness, fairness and transparency;
 - Purpose limitation;
 - Data minimization;
 - Accuracy;
 - Storage limitation;
 - Integrity and confidentiality;
 - Accountability.
-

7. CATEGORIES OF PERSONAL DATA

MyPup may process:

Identification Information

- Name;
- Company name;

- Job title;
- Reference numbers.

Contact Information

- Email address;
- Telephone number;
- Postal address.

Complaint Information

- Complaint details;
- Correspondence;
- Investigation notes;
- Supporting evidence;
- Documents and attachments.

Only information necessary for complaint handling shall be processed.

8. PURPOSES OF PROCESSING

Personal data may be processed for:

- Complaint registration;
- Investigation;
- Communication;
- Resolution;
- Appeals handling;
- Corrective and preventive actions (CAPA);
- Information security management;
- Legal compliance;
- Service improvement;
- Legal claims management.

9. LEGAL BASIS FOR PROCESSING

Article 6(1)(b) GDPR - Contract

Processing necessary to perform contractual obligations or investigate service-related complaints.

Article 6(1)(c) GDPR - Legal Obligation

Processing necessary to comply with legal or regulatory obligations.

Article 6(1)(f) GDPR - Legitimate Interests

Processing necessary for:

- Complaint resolution;
- Service improvement;
- Governance;
- Risk management;
- Information security;
- Legal defense.

Special Category Data

Special category personal data shall only be processed where a valid Article 9 GDPR condition applies.

10. ACCESS AND CONFIDENTIALITY

Access to complaint records shall be restricted to authorized individuals with a legitimate business need.

All persons involved in complaint handling are subject to confidentiality obligations.

11. INFORMATION SECURITY

Complaint-related information shall be protected through appropriate technical and organizational controls, including:

- Access control;
- Authentication controls;
- Encryption where appropriate;
- Audit logging;
- Backup and recovery;
- Incident management.

These controls form part of MyPup's ISMS and align with ISO/IEC 27001.

12. PERSONAL DATA BREACHES

Personal data breaches shall be managed in accordance with MyPup's Incident Management Procedure.

Where required by law, MyPup shall:

- Notify supervisory authorities;
 - Notify affected data subjects;
 - Maintain breach records;
 - Implement corrective actions.
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13. DISCLOSURE OF PERSONAL DATA

Personal data shall only be disclosed where:

- Required for complaint handling;
 - Required by law;
 - Requested by competent authorities;
 - Necessary for legal proceedings;
 - Authorized by the data subject.
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14. THIRD-PARTY PROCESSORS

Where third parties process personal data on behalf of MyPup, appropriate Data Processing Agreements (DPAs) shall be maintained in accordance with Article 28 GDPR.

15. INTERNATIONAL DATA TRANSFERS

International transfers shall only occur where adequate safeguards are implemented, including:

- Adequacy Decisions;
 - Standard Contractual Clauses;
 - Other lawful transfer mechanisms.
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16. RETENTION AND DISPOSAL

Complaint records shall only be retained for as long as necessary.

As a general principle, complaint records may be retained for up to **seven (7) years** after closure unless:

- A longer retention period is legally required;
- A legal claim exists;
- Regulatory requirements apply.

Records shall be securely deleted, destroyed, or anonymized at the end of the retention period.

17. DATA SUBJECT RIGHTS

Data subjects may exercise:

- Right of Access;
- Right to Rectification;
- Right to Erasure;
- Right to Restriction;
- Right to Data Portability;
- Right to Object;

- Rights relating to Automated Decision-Making.

MyPup does not use automated decision-making or profiling in complaint management.

18. RIGHT TO LODGE A COMPLAINT

Individuals may contact MyPup directly regarding privacy concerns.

They also have the right to lodge a complaint with the competent supervisory authority.

For the Netherlands:

Autoriteit Persoonsgegevens

<https://www.autoriteitpersoonsgegevens.nl>

19. ACCOUNTABILITY

MyPup maintains appropriate policies, procedures, records, controls, and governance measures to demonstrate compliance with GDPR requirements, including Records of Processing Activities (RoPA) where applicable.

20. POLICY GOVERNANCE AND REVIEW

This Notice shall be reviewed:

- Annually;
- Following legislative changes;
- Following significant incidents;
- Following material business changes;
- Following significant amendments to the Complaints Procedure.

All material updates require Management approval.

RELATED DOCUMENTS

- MyPup Complaints Procedure
- MyPup Complaints Form

- MyPup Privacy Policy
 - Information Security Policy
 - Data Retention Policy
 - Incident Management Procedure
 - Records of Processing Activities (RoPA)
 - Information Security Management System (ISMS)
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CONTACT INFORMATION

Complaints & Grievances

 grievance@my-pup.com

APPENDIX – PRIVACY NOTICE CHANGE HISTORY

(Controlled Document Record)

Document Title: Privacy Notice for the MyPup Complaints Procedure

Document Owner: Chief Business Support

Document Classification: Internal & External

Related Standard(s): GDPR, ISO/IEC 27001

Document Type: Controlled Policy Appendix

Purpose

This Change History Appendix provides a formal audit trail of amendments, revisions, approvals, and reviews relating to the MyPup Privacy Notice for the Complaints Procedure.

The purpose of this register is to:

- Maintain document integrity and version control.
- Demonstrate compliance with governance requirements.
- Support internal and external audits.
- Ensure traceability of policy changes.
- Evidence management review and approval activities.
- Support continuous improvement within the Information Security Management System (ISMS).

Version Control Register

Version	Date	Author	Description of Change	Approved By	Status
1.0	01-01-2025	Chief Business Support	Initial issue of the Complaints Procedure.	Management Board	Approved
2.0	05-10-2026	B Keepers	Additions about the course of the process and supplements on the GDPR and ISO 27001	Management Board	Approved

Review History

Review Date	Reviewer	Review Outcome	Next Review Date
01-12-2025	Chief Business Support	Initial Review Completed	01-12-2026
01-10-2026	B Keepers	Additional interim review following feedback from the B Corp assessment, additions on process, GDPR and ISO 27001	01-07-2027

Major Revision Categories

The following events require a review and potential revision of this Privacy Notice:

Regulatory Changes

- GDPR amendments or regulatory guidance.
- Changes to applicable privacy legislation.
- Supervisory authority recommendations or enforcement actions.

Business Changes

- Significant changes to complaint handling processes.
- Changes in services, systems, or technologies.
- Organisational restructuring affecting responsibilities.

Security and Privacy Events

- Personal data breaches.
- Information security incidents.
- Material audit findings.
- Compliance investigations.

Governance Changes

- Changes to management responsibilities.

- Appointment of a Data Protection Officer (DPO).
- Changes to information security governance arrangements.

Approval Record

Version	Approval Date	Approved By	Position
1.0	13-12-2024	Luke van der Wardt & Dennis van den Berg	Management Board Representatives (Founders MYPUP)
2.0	05-10-2026	Luke van der Wardt & Dennis van den Berg	Management Board Representatives (Founders MYPUP)

Distribution Record

Recipient Group	Distribution Method
Management	Controlled Copy
Operations Team	Controlled Copy
Complaint Officers	Controlled Copy
Compliance Personnel	Controlled Copy
Information Security Personnel	Controlled Copy
External Stakeholders (upon request)	Public Version

Document Retention

Change history records shall be retained in accordance with the MyPup Data Retention Policy and Information Security Management System requirements.

Document control records shall be maintained for a minimum period consistent with legal, regulatory, contractual, and audit requirements.

Revision Approval Workflow

1. Policy change identified.
 2. Change impact assessed.
 3. Draft revision prepared.
 4. Legal, compliance, privacy, and operational review performed (where applicable).
 5. Management approval obtained.
 6. New version published.
 7. Previous version archived.
 8. Change History Register updated.
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Version Numbering Standard

Change Type	Version Example
Major Policy Revision	2.0, 3.0, 4.0
Significant Update	1.1, 1.2, 1.3
Administrative Update	1.0.1, 1.0.2

Major Revision

A change affecting:

- Governance requirements;
- Regulatory compliance obligations;
- Data subject rights;
- Legal basis for processing;
- Information security controls.

Minor Revision

A change affecting:

- Procedural details;

- Internal references;
- Contact information;
- Clarifications or formatting.

Administrative Revision

A change affecting:

- Typographical corrections;
- Formatting improvements;
- Non-substantive document updates.

Annual Review Certification

The reviewer shall confirm that:

- ☐ The policy remains accurate and current.
- ☐ Applicable legal and regulatory requirements have been reviewed.
- ☐ GDPR compliance remains effective.
- ☐ ISO/IEC 27001 alignment remains appropriate.
- ☐ Contact information remains accurate.
- ☐ Required updates have been identified and implemented.

Reviewer

Name: _Luke van der Wardt_____

Position: CEO & Founder_____

Date: October 5, 2026_____

Signature: _____

Change Management Declaration

All amendments to the Privacy Notice for the Complaints Procedure shall be managed through MyPup's document control process and approved in accordance with applicable governance requirements.

No uncontrolled modifications may be made to the approved version of this document.
