

# Procedure – Appeals and Complaints Handling Process

## Kompleye

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CODE	KP-QIP-007-EN
DATE	December 20, 2024
SUMMARY	This procedure establishes the activities for handling appeals and complaints.

### APPROVED

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**PATRICIO GARCIA**  
CEO



The information contained in this document cannot be changed without the express authorization of the CEO of the Organization.

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## 1 General Information

### 1.1 Objectives

To define a procedure to ensure that appeals and complaints with Complainants or any interested parties are promptly dealt with.

### 1.2 Scope

It applies to all services provided by Kompleye related to assessment activities.

This procedure applies to:

- Audit results appeals;
- Inspection Activities;
- Kompleye clients complaints against Kompleye;
- Complaints made by interested third parties against Kompleye certified clients;

### 1.3 References

- **ISO/IEC 17020** Conformity assessment — Requirements for the operation of various types of bodies performing inspection.
- **ISO/IEC 17021-1** Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements
- **ISO/IEC 17021-3** Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 3: Competence requirements for auditing and certification of quality management systems.
- **ISO/IEC 27006:2015** Information technology — Security techniques — Requirements for bodies providing audit and certification of information security management systems
- **ISO/IEC 27006:2015 AMD 1:** Information technology — Security techniques — Requirements for bodies providing audit and certification of information security management systems.
- **ISO/IEC TS 27006-2:2021:** Requirements for bodies providing audit and certification of information security management systems — Part 2: Privacy information management systems.
- **ISO/IEC 27006-1:** Information security, cybersecurity and privacy protection — Requirements for bodies providing audit and certification of information security management systems — Part 1: General
- **ISO 9000** Quality management systems — Fundamentals and vocabulary
- **ISO 9001** Quality management systems — Requirements

- **ISO/TS 9002:2016** Quality management systems - Guidelines for the application of ISO 9001:2015
- **ISO 19011** Guidelines for auditing management systems
- **ISO/IEC 27001:** Information technology — Security techniques — Information security management systems — Requirements
- **ISO/IEC 27701:** Security techniques — Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management — Requirements and guidelines
- **ISO/IEC 20000-1:** Information technology - Service management Part 1: Service management system requirements
- **ISO/IEC 20000-6** Information technology - Service management Part 6: Requirements for bodies providing audit and certifications of service management systems
- **32 CFR Part 170 Cybersecurity Maturity Model Certification (CMMC) Program**
- **IAF Mandatory Documents**
- **ANAB - Accreditation Rules**

For dated references, only the edition cited applies. For undated references, the latest edition or the valid version of the referenced document (including any amendments) applies.

### 1.4 Responsibilities

This document is generated by the ISO Lead of the Organization and reviewed and approved by the CEO.

It is the responsibility of the entire organization to follow the parameters specified in this document.

It is the ISO Lead's responsibility to verify the implementation of what is specified in this procedure and its compliance in all areas of the Organization.

### 1.5 Definitions

For the purposes of this document, the terms and definitions contained in ISO/IEC17020 and ISO/IEC 17021 and the following apply:

- **Appeals:** Request by the provider of the item of inspection to the inspection body for reconsideration by that body of a decision it has made relating to that item.
- **Complaints:** Expression of dissatisfaction, other than appeal, by any person or organization to an inspection body, relating to the activities of that body, where a response is expected.

## 2 Procedure - Appeals and Complaints Handling Process

It would be the endeavors of Kompleye to provide efficient and satisfactory services. However, in case it is felt that any decision or conduct of Kompleye is unjust and prejudicial to any party, they can appeal to Kompleye and seek redressal.

Appeals and/or complaints are brought to the notice of Kompleye are promptly dealt with and remain confidential. Information about the client from sources other than the client are also kept confidential. This procedure is applicable to decisions pertaining to certification including maintenance.

It is ensured that personnel are not employed to investigate any appeal and/or complaint if they have been directly involved in the activities towards the organization or any other party involved in the appeal or complaint in question within the certification cycle.

It is ensured that submission, investigation and decision on appeals and complaints will not result in any discriminatory actions against the appellant/complainant.

A description of the Appeals and Complaints Handling Process Procedure shall be available to any interested party upon request.

### **Cybersecurity Maturity Model Certification (CMMC) Program**

If a CSO disagrees with the assessment results, it may formally dispute the assessment and initiate an Assessment Appeal process with the C3PAO that conducted the assessment.

Kompleye shall submit assessments appeals using eMASS (addressed in a separate CMMC eMASS ICR for the CMMC 32 CFR part 170 Program final rule). Appeals shall be tracked in the CMMC instantiation of eMASS and any resulting changes to the assessment results shall be uploaded into the CMMC instantiation of eMASS.

#### 2.1 Appeals

No.	ACTIVIDAD	RESPONSABLE
1.	<p><b>If applicable, Communicate about the appeal process:</b></p> <p>Client organizations are advised of the appeals process for nonconformities during the opening/closing meeting of the on-site activity.</p> <p>See: KP-AEP-010-ENAAudit Execution Process</p>	Lead Auditor

No.	ACTIVIDAD	RESPONSABLE
2.	<p><b>Communicate the appeal:</b></p> <p>Any Kompleye personnel member may receive an appeal either verbally or in writing. Once received, a ticket must be submitted through the ticketing system (Kono Ticket Tool) addressed to the ISO lead, explaining the reason for the appeal, and detailing the appellant's contact information.</p> <p><b>Note:</b> It is also possible to receive appeals through the Complaints form (<a href="#">Complaints - Kompleye - Home</a>) published on the Kompleye website. Once received it must be reported to the ISO Lead.</p>	Kompleye personnel and/or Appellant
3.	<p><b>Registering the appeals</b></p> <p>Once the appeal is received, it must be registered in the Kono – Appeals/Complaints Portal and the information must be validated with the Appellant (if applicable).</p> <p>Appeals can be due to:</p> <ul style="list-style-type: none"> <li>• Nonconformities.</li> <li>• Refusal of an audit by Kompleye.</li> <li>• Non acceptance of scope of certification.</li> <li>• Decisions made on misuse, suspension, withdrawal, cancellation, extending and reducing the certification.</li> <li>• Failure to recommend certification by Kompleye.</li> <li>• Notification by any third party/interested party against the grant of certification by Kompleye.</li> <li>• Inspection process</li> <li>• Inspection results</li> </ul> <p>In case the appeal is associated with a nonconformity, the appellant shall provide information on the nonconformity in question.</p>	ISO Lead
4.	<p><b>Analyze the appeal and propose a solution:</b></p>	ISO Lead Person responsible for solution

No.	ACTIVIDAD	RESPONSABLE
	Communicate the appeal to the person responsible and raise the solution.	
5.	<p><b>Communicate action plan to the appeal:</b></p> <p>The person Responsible for the solution shall communicate to the Appellant the action plan to bring closure to the submitted appeal.</p> <p>Note: Appeals must be responded within 10 business days of reception.</p>	Person responsible for solution
6.	<p><b>Provide feedback to the ISO Lead</b></p> <p>Report on solutions found, actions taken, progress and effectiveness to the ISO Lead.</p>	Person responsible for solution
7.	<p><b>Update Information</b></p> <p>Update follow-up fields information in the Kono – Appeals/Complaints Portal.</p>	ISO Lead
8.	<p>Has the appeal been resolved?</p> <p>Yes, it has been Solved: <span style="float: right;">Activity No.: 9</span></p> <p>Otherwise: <span style="float: right;">Activity No.: 4</span></p>	
9.	<p><b>Closing of the appeal:</b></p> <p>Update the follow-up field and closing date in the Kono – Appeals/Complaints Portal.</p> <p>A formal notice of conclusion of the appeal handling process will be provided to the appellant, through the email provided.</p> <p>No appeal can be considered CLOSED until verification results in a satisfactory outcome by the appellant (email follow-up).</p> <p>In case of appeals relevant to public interest, the certified organization/customer and the appellant</p>	ISO Lead

No.	ACTIVIDAD	RESPONSABLE
	<p>shall be consulted and if felt necessary information about the appeal and its resolution will be made available for public viewing.</p> <p>Submission, investigation, and decision on appeals will not result in any discriminatory actions against the appellants.</p>	
10.	<p><b>Data analysis:</b></p> <p>Information should be analyzed semi-annually in order to identify trends and possible corrective actions required (in cases of increased appeals, recurring appeals, etc.). This information will be included in the Management Review entries.</p>	ISO Lead
11.	End of procedure	

### 2.2 Complaints

No.	ACTIVIDAD	RESPONSABLE
1.	<p><b>Communicate the complaint or suggestion:</b></p> <p>Any Kompleye personnel member may receive a complaint either verbally or in writing. Once received, a ticket must be submitted through the ticketing system (Kono Ticket Tool) addressed to the ISO lead, explaining the reason for the complaint, and detailing the complainant's contact information.</p> <p><b>Note:</b> It is also possible to receive complaints through the Complaints form (<a href="#">Complaints - Kompleye - Home</a>) published on the Kompleye website. Once received it must be reported to the ISO Lead.</p>	Kompleye personnel and/or Complainant
2.	<p><b>Register the complaint or suggestion</b></p> <p>Once the complaint or suggestion is received, it must be registered in the Kono – Appeals/Complaints Portal and the information must be validated with the Complainant (if applicable).</p>	ISO Lead

No.	ACTIVIDAD	RESPONSABLE
3.	<p><b>Is it a complaint?</b></p> <p>Yes, it is a complaint: <span style="float: right;">Activity No.:4</span></p> <p>Otherwise:</p> <p>Analyze with the affected Area the feasibility of implementing or not the suggestion made by the customer.</p> <p style="text-align: right;">End of Procedure</p>	
4.	<p><b>Analyze the complaint and propose a solution:</b></p> <p>Communicate the complaint to the person responsible and raise the solution. Follow procedure: KP-CAP-006-ES Corrective, Preventive Actions and Opportunities for Improvement.</p> <p>See: 2.2.1 Complaints Received Against Certified Organizations.</p>	<p>ISO Lead Person responsible for solution</p>
5.	<p><b>Communicate action plan to the Complainant:</b></p> <p>The person Responsible for the solution shall communicate to the Complainant the action plan to bring closure to the submitted complaint.</p>	<p>Person responsible for solution</p>
6.	<p><b>Provide feedback to the ISO Lead</b></p> <p>Report on solutions found, actions taken, progress and effectiveness to the ISO Lead.</p>	<p>Person responsible for solution</p>
7.	<p><b>Update Information</b></p> <p>Update follow-up fields the Kompleye Appeals, Complaints and Suggestions portal.</p>	<p>ISO Lead</p>
8.	<p>Has the complaint been resolved?</p> <p>Yes, it has been Solved: <span style="float: right;">Activity No.: 9</span></p> <p>Otherwise:</p>	

No.	ACTIVIDAD	RESPONSABLE
	Activity No.: 4	
9.	<p><b>Closing of the Complaint:</b></p> <p>Update the follow-up field and closing date in the Kono – Appeals/Complaints Portal.</p> <p>A formal notice of conclusion of the appeal handling process will be provided to the complainant, through the email provided.</p> <p>No complaint can be considered CLOSED until verification results in a satisfactory outcome by the Complainant (email follow-up).</p> <p>In case of complaints relevant to public interest, the certified organization/customer and the complainant shall be consulted and if felt necessary information about the complaint and its resolution will be made available for public viewing.</p> <p>Submission, investigation, and decision on complaints will not result in any discriminatory actions against the complainant.</p>	ISO Lead
10.	<p><b>Data analysis:</b></p> <p>Information should be analyzed semi-annually in order to identify trends and possible corrective actions required (in cases of increased complaints, recurring complaints, etc.). This information will be included in the Management Review entries.</p>	ISO Lead
11.	End of procedure	

### 2.2.1 Complaints Received Against Certified Organizations

For complaints received against certified organizations, the ISO Lead may decide to:

- Advise to visit/audit may be planned for ascertaining the actions taken and ensuring effectiveness of the certified management system.
- Advise verification of actions taken during forth-coming surveillance audit.
- Kompleye shall require that the certified Complainant organization that, on receipt of a complaint, the certified Complainant organization shall establish, and where

appropriate report on, the cause of the complaint, including any predetermining factors within the Complainant organization's Management System.

- Kompleye shall ensure that the Complainant organization is using such investigations to develop remedial/corrective action, which shall include measures for:
  - notification to appropriate authorities if required by regulation.
  - restoring conformity.
  - preventing recurrence.
  - evaluating and mitigating any adverse security incidents and their associated impacts.
  - ensuring satisfactory interaction with other components of the Management System.
  - assessing the effectiveness of the remedial / corrective measures adopted.
- Kompleye will require each Complainant organization whose Management System is certified to make available to Kompleye when requested, the records of all complaints and corrective action taken in accordance with the requirements of the standard.
- Any such complaints referred to management are examined in fairness and reviewed by the ISO Lead and any other personnel as required either separately or jointly. The complainant may be asked to withdraw the complaint if found not relevant. A complaint after the date on which it has been received, is to be dealt with, within three months.

### 2.3 Confidentiality

Kompleye shall be responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of audit/inspection activities. Kompleye shall inform the client, in advance, of the information it intends to place in the public domain. Except for information that the client makes publicly available, or when agreed between Kompleye and the client, all other information is considered proprietary information and shall be regarded as confidential.

### 3 Performance Indicators

NAME	Appeals Resolved
<b>OBJECTIVE (Reason of the indicator and what it measures)</b>	To measure the level or degree of compliance with response times for appeals.
<b>DEFINITION (Must include method of calculation and units)</b>	$(\text{Appeals resolved in the period} / \text{Number of Appeals in the period}) * 100$
<b>DATA SOURCE (Source from which data is taken)</b>	Kono – Appeals/Complaints Portal
<b>RESPONSIBLE FOR THE INDICATOR (From the collection of the information)</b>	ISO Lead.
<b>FREQUENCY</b>	Annual
<b>TARGET</b>	100%

NAME	Complaints and Suggestions Resolved
<b>OBJECTIVE (Reason of the indicator and what it measures)</b>	To measure the level or degree of compliance with response times for complaints, and suggestions.
<b>DEFINITION (Must include method of calculation and units)</b>	$(\text{Complaints, and Suggestions resolved in the period} / \text{Number of Complaints, and Suggestions received in the period}) * 100$
<b>DATA SOURCE (Source from which data is taken)</b>	Kono – Appeals/Complaints Portal
<b>RESPONSIBLE FOR THE INDICATOR (From the collection of the information)</b>	ISO Lead.
<b>FREQUENCY</b>	Annual
<b>TARGET</b>	90%

#### 4 Records Generated

<b>Format Used</b>	<b>Kono – Appeals/Complaints Portal</b>
Record that Originates	Follow-up on appeals, complaints and/or suggestions.
Identification	Number of the record
Record Type	Digital
Responsible for Preparation/Filing	ISO Lead
Storage	Kono – Appeals/Complaints Portal
Access	All Organization
Recovery	Name of the Record
Time of conservation	Permanent
Responsible for Conservation	ISO Lead/CTO
Final Disposition	Permanent

## 5 Referenced Documents

- KM-QM-001-EN Quality Manual.
- KP-AEP-010-EN Audit Execution Process
- KP-CAP-006-ES Corrective, Preventive Actions and Opportunities for Improvement