



## How to submit

# Compliments, Complaints, Information on certified organizations or Appeals to RINA Services

This document describes how to submit compliments or complaints to RINA Services concerning its activities, submit information concerning an organisation which has been certified by RINA Services or file an appeal against a decision issued by RINA.

Compliments, complaints, information and appeals on RINA Services activities, or information on organizations certified by RINA Services, shall be submitted via e-mail to:

[crt.accreditation@rina.org](mailto:crt.accreditation@rina.org)

Moreover, appeals shall also be despatched to the pertinent RINA Services office, by registered letter with return receipt to the relevant RINA Services office managing the appellant's contract.

Compliments and complaints shall include all the data required to allow RINA Services to properly identify the activity involved, together with the relevant claimant contacts.

Information will detail all the relevant data concerning the certified organisation and the certified product/service involved, together with the relevant claimant contacts.

Communication confirming the receipt of the claim (compliment, complaint or information) will be provided by RINA Services to the claimant.

The complaint or information will be analysed and the subject investigated in order to properly manage and resolve the issue in the most effective way in a timely manner, depending from the action required.



At the end of the investigation the outcome of the analysis and action taken will be communicated to the claimant by RINA Services.

Please note that, to effectively manage the submission of compliments, complaints, information or appeals, the official channels will be used:

- E-mail to [crt.accreditation@rina.org](mailto:crt.accreditation@rina.org) for submission of any compliment, complaint or information;
- E-mail to [crt.accreditation@rina.org](mailto:crt.accreditation@rina.org) and registered letter with return receipt to the pertinent RINA Services office, for submission of any appeal.

Personal data collected will be processed in accordance with Article 13 of the GDPR, as referred in the [PRIVACY NOTICE](#), which shall be provided undersigned together with the compliment, complaint, or information in order to allow the correct management of the same.

For any report concerning violations of the Code of Ethics, human rights, laws and regulations, or to GDPR please refer to the dedicated platform at the following link:

[Whistleblowing - RINA.org](https://www.rina.org/whistleblowing)

Please note that the whistleblowing platform allow the possibility to submit anonymous claims.

Please find hereinafter the methods adopted by RINA Services - Certification Division for the management of claims, being these compliments, complaints or information about customers, or appeals and disputes, as defined in the current version of the applicable RINA Service internal instruction (IS-CERTI-ACP-03), of which this procedure is an abstract for the public.

<h1>RINA</h1>	<b>Procedure for the Management of Compliments, Complaints, Information, Appeals and Disputes</b>  <b>(PUBLIC ABSTRACT)</b>	<b>IS-CERTI-ACP-03-P</b>
		<b>Rev. 00</b>
		Page 3/12

**TABLE OF CONTENTS**

1. DEFINITIONS AND ABBREVIATIONS .....	4
2. CLAIMS RECEPTION .....	5
3. COMMUNICATION TO ACCREDITATION/RECOGNITION BODIES .....	5
4. PUBLICATION.....	5
5. COMPLAINTS / INFORMATIONS MANAGEMENT .....	5
5.1 COMPLAINT RECEIPT AND REGISTRATION .....	5
5.2 CLAIM ANALYSIS AND MANAGEMENT ACTION(S) PROPOSAL .....	6
5.3 CLAIM MANAGEMENT ACTION(S) PROPOSAL APPROVAL/REJECTION .....	6
5.4 CLAIM MANAGEMENT ACTION(S) IMPLEMENTATION AND COMMUNICATIONS .....	7
5.5 CLAIM CLOSURE .....	7
6. APPEALS CONTROL.....	7
7. DISPUTES.....	8
8. ANALYSIS AND CONCLUSION .....	8

PRIVACY NOTICE

<h1>RINA</h1>	<b>Procedure for the Management of Compliments, Complaints, Information, Appeals and Disputes</b>	<b>IS-CERTI-ACP-03-P</b>
	<b>(PUBLIC ABSTRACT)</b>	<b>Rev. 00</b>
		Page 4/12

## 1. DEFINITIONS AND ABBREVIATIONS

**Appeal:** Written communication stating disagreement about decisions taken by RINA Certification concerning the non-issuance, suspension or withdrawal of certification. For CDM activity under UNFCCC accreditation, an appeal is defined as “A CDM client organization’s (CDM PP – project participant) request for a review by an independent appeal panel of various decisions taken by a DOE (Designated Operational Entity) in respect of validation and/or verification/certification functions”.

**CECPL:** RINA Certification Compliance & Process Improvement Unit.

**Claim:** any compliments, complaints about RINA activities or information about RINA customers.

**Complaint:** Communication stating dissatisfaction about services supplied by RINA.

For CDM activity under UNFCCC accreditation, complaint is defined as “formal expression of dissatisfaction, made verbally, electronically or in writing, regarding the performance of a DOE or its outsourced entities in relation to its validation or verification/certification functions from any source, such as clients, project participants, the general public or its representatives, government bodies, non-governmental organization, etc.”

**Compliment:** Communication stating an exceptional level of satisfaction about services supplied by RINA.

**CSI:** RINA Committee for Safeguarding Impartiality

**Dispute:** Disagreement situation that may not be addressed as complaint or appeal (e.g. controversy, discord). For CDM activity under UNFCCC accreditation, dispute is defined as “disagreement between a DOE and its client regarding the DOE’s recommendation and/or opinion/decisions made at various stages in the course of its validation and/or verification/certification activities.

**DOE:** Designated operational entity. A DOE is an independent auditor accredited by the CDM Executive Board (CDM EB) to validate project proposals or verify whether implemented projects have achieved planned greenhouse gas emission reductions

**Information:** Communication stating a dissatisfaction with the product/service supplied by organisations certified by RINA, including anonymous ones.

**RINA:** RINA Services Certification Division

**Scheme Manager:** RINA personnel responsible for the management of specific certification scheme(s).

<h1>RINA</h1>	<b>Procedure for the Management of Compliments, Complaints, Information, Appeals and Disputes</b>  <b>(PUBLIC ABSTRACT)</b>	<b>IS-CERTI-ACP-03-P</b>
		<b>Rev. 00</b>
		Page 5/12

## 2. CLAIMS RECEPTION

The official reception channel for any kind of claim is the address [crt.accreditation@rina.org](mailto:crt.accreditation@rina.org).

RINA personnel receiving contact from any parties interested in submitting a claim will address the claimant to use the official channel and submit the claim via e-mail to [crt.accreditation@rina.org](mailto:crt.accreditation@rina.org), in order to allow the claim management process to be correctly commenced.

Other communication channels, such as customer interface person coordinates, reference OU e-mails, commercial or project meetings, telephone calls, faxes, letters, other means, would not lead to the official recognition of the claim. Any claimant using those non-recognised channels will be addressed to the official reception channel for the claim submission: [crt.accreditation@rina.org](mailto:crt.accreditation@rina.org).

## 3. COMMUNICATION TO ACCREDITATION/RECOGNITION BODIES

If any Accreditation Body (or any other type of external Recognition Body) is involved in a claim, by taking direct contact to require updates on the claim management, or in other ways, relevant updates will be provided to this party on the status of the claim management.

## 4. PUBLICATION

RINA Legal Affairs unit will be involved together with RINA customer involved in the claim and the claimant, to determine if any information on the claim shall be made public, and the extent of the information to be eventually publicly shared.

## 5. COMPLAINTS / INFORMATIONS MANAGEMENT

### 5.1 COMPLAINT RECEIPT AND REGISTRATION

Any RINA OU receiving contact from any parties interested in submitting a claim will address the claimant to use the official channel and submit the claim via e-mail to [crt.accreditation@rina.org](mailto:crt.accreditation@rina.org) in order to allow the claim management process to be correctly commenced.

RINA Compliance section, upon receiving the claim through the official channel (e-mail to [crt.accreditation@rina.org](mailto:crt.accreditation@rina.org)) will, within 10 working days acknowledge receipt to the claimant and record, assigning it to the pertinent RINA office(s) for analysis and management.

All records relevant to any claim received (including the claimants' contact details, incoming and outgoing communications, evidence of corrections carried out, etc.) are permanently filed in a dedicated RINA

<h1>RINA</h1>	<b>Procedure for the Management of Compliments, Complaints, Information, Appeals and Disputes</b>  <b>(PUBLIC ABSTRACT)</b>	<b>IS-CERTI-ACP-03-P</b>
		<b>Rev. 00</b>
		Page 6/12

database.

When a complaint is registered in the dedicated RINA database, a notification is automatically sent to:

- 1) The responsible(s) of RINA office(s) assigned to the claim management and analysis;
- 2) The Director of RINA Compliance Unit; and
- 3) The Scheme Manager for the certification scheme of eventual interest for the claim.

## 5.2 CLAIM ANALYSIS AND MANAGEMENT ACTION(S) PROPOSAL

The claim is analysed by the relevant RINA office(s) and within 10 working days from its registration, action(s) for its management is(are) submitted for approval:

a) to the Scheme Manager of the relevant certification scheme, if the claim refers the claimant's dissatisfaction about the product/service supplied by an organisation certified by RINA (INFORMATION);

OR

b) to the Director of RINA Compliance Unit, if the claim refers to the claimant's dissatisfaction about services supplied by RINA (COMPLAINT).

If the complaint is evaluated as not consistent, the action proposed for its management will be the claim rejection, accompanied by appropriate justification.

## 5.3 CLAIM MANAGEMENT ACTION(S) PROPOSAL APPROVAL/REJECTION

The Scheme Manager of the relevant (in case of INFORMATION) or the Director of RINA Compliance Unit (in case of COMPLAINT), verifies and approves or reject, with eventual GLEGA support, the action(s) proposed, ensuring an independent verification not being directly involved in the activities subject of the complaint.

If the Scheme Manager of the relevant (in case of INFORMATION) or the Director of RINA Compliance Unit<sup>1</sup> (in case of COMPLAINT) evaluates the action(s) proposed to be inadequate for the claim management, if this is rejected, appropriate action(s) shall be re-submitted for approval.

In addition, the eventual need to raise an internal non-conformity is considered by the Scheme Manager of the relevant (in case of INFORMATION) or the Director of RINA Compliance Unit (in case of COMPLAINT), to address eventual systemic lacks that could lead to the recurrence of the cause for the claimant dissatisfaction.<sup>2</sup>

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<sup>1</sup> CDM Scheme Manager is responsible to manage the complaints relevant to CDM activities, instead of CECPL Director.

The OU receiving the complaint will gather and verify all necessary information for evaluating the validity of the complaint, investigating the complaint and proposing what actions are to be taken in response to it. The actions to be taken are approved by the CDM Scheme Manager. The CDM Scheme Manager ensures that people engaged in the complaint handling process are different from those who carried out the validation or verification/certification activities

<sup>2</sup>This is always the case for complaints relevant to validation and verification of CDM projects

<h1>RINA</h1>	<b>Procedure for the Management of Compliments, Complaints, Information, Appeals and Disputes</b>  <b>(PUBLIC ABSTRACT)</b>	<b>IS-CERTI-ACP-03-P</b>
		<b>Rev. 00</b>
		Page 7/12

In such case, the pertinent RINA Compliance Unit personnel is notified in order for an internal non-conformity to be raised, which would be managed in accordance with the relevant RINA.

#### **5.4 CLAIM MANAGEMENT ACTION(S) IMPLEMENTATION AND COMMUNICATIONS**

After the action(s) approval, it will be actuated according to the required implementation schedule by the defined RINA personnel, and the claimant will be notified about the relevant communication/updates on the claim management status.

In the case of claim referring to the claimant's dissatisfaction about the product/service supplied by an organisation certified by RINA (INFORMATION), the certified organization could be contacted in order to allow collection of the relevant evidence useful for the claim management, eventually referring to general or specific matters pertaining the claim subject.

Eventual other parties eventually involved (i.e. Accreditation/Recognition Body, RINA certified organization subject of the claim, other as deemed necessary) will be notified accordingly about the relevant communication/updates on the claim management status, as considered appropriate.

Once the action(s) foreseen for the claim management have been actuated, the claimant will be notified about their completion and the claim completion date is updated in the dedicated database.

#### **5.5 CLAIM CLOSURE**

In absence of the claimant's submission of additional relevant evidence the claim will be closed officially by RINA after:

- c) one month, if the claim refers the claimant's dissatisfaction about the product/service supplied by an organisation certified by RINA (INFORMATION);
- d) OR
- e) two months, if the claim refers to the claimant's dissatisfaction about services supplied by RINA (COMPLAINT).

RINA Compliance Unit personnel periodically monitors the status of claims and the effectiveness of their management, moreover, as soon as the due date for completion is set in the dedicated RINA database for the management of the claim, an automatic e-mail reminder is sent to the relevant responsible for the claim management every first day of the month to notify eventual claims to be closed in subsequent month, or overdue.

#### **6. APPEALS CONTROL**

Appeals against decisions taken by RINA concerning the non-issuance, suspension or withdrawal of certification are collected and filed by pertinent RINA office in contact with the client, that will provide written receipt confirmation to the appellants.

<h1>RINA</h1>	<b>Procedure for the Management of Compliments, Complaints, Information, Appeals and Disputes</b>  <b>(PUBLIC ABSTRACT)</b>	<b>IS-CERTI-ACP-03-P</b>
		<b>Rev. 00</b>
		Page 8/12

All documentation related to the appeal will be submitted to RINA Compliance Unit Director, involving the interested Scheme Manager as applicable and, if necessary, the appellant.

For CDM activities under UNFCCC accreditation appeals against decisions taken by RINA Certification concerning the request made by a client for a formal review of a decision taken by RINA in respect of its validation and/or verification/certification activities are managed by the CDM Scheme Manager.

In addition, the eventual need to raise an internal non-conformity is considered by the Director of RINA Compliance Unit.

In such case, the pertinent RINA Compliance Unit personnel is notified in order for an internal non-conformity to be raised, which would be managed in accordance with the relevant RINA instruction.

Any appeal that could not be resolved is submitted to the CSI, together with a report drafted by RINA Compliance Unit Director.

The CSI, after the relevant investigations, eventually involving the appellant, provides an opinion on the matter within 60 days, which is notified by CECPL personnel to the involved RINA office(s) responsible(s) and to the appellant.

For CDM activities under the UNFCCC accreditation, in case a negative opinion is given on the appeal, the appellant is also informed that, if it is not satisfied, it has the option of making a complaint to the Board.

CECPL unit maintains records relevant to appeals for at least 3 years, unless otherwise required in the accreditation/recognition/notification agreements or rules.

## **7. DISPUTES**

Modalities for the management of any dispute that may arise from parties with reference to interpretation and execution of an existing contract are detailed in the document "General Contract Conditions Governing System, Product and Personnel Certification", available on RINA web site.

For CDM activities under UNFCCC accreditation, the disputes are managed according the procedures for claims management described in the previous chapters.

The procedure for handling disputes is made available to clients upon request of if a dispute occurs.

## **8. ANALYSIS AND CONCLUSION**

Analysis of claims, appeals and compliments registered is made annually, together with the results of the current customer satisfaction survey, as input to the process of RINA Quality Management System planning and review.





## **PRIVACY NOTICE**

Pursuant to art 13 of Regulation (EU) 2016/679 (hereinafter, the “GDPR”) and in relation to data provided by the Client or obtained by the Controller during the contractual relationship for the proposed services, the Client is hereby informed that its data will be processed by the following means and for the following purposes:

### **1. DATA CONTROLLER**

RINA S.p.A., whose registered office is in Genoa (Italy), via Corsica 12, Tax code and VAT n° 03794120109, as well as the Company(ies) in the RINA Group are Joint Controllers according to art.26 GDPR. The Controller can be contacted via the contact details shown on the [www.rina.org](http://www.rina.org) website, or via the e-mail address for the Data Protection Officer [rina.dpo@rina.org](mailto:rina.dpo@rina.org).

### **2. PURPOSE OF PROCESSING**

The Controller processes the personal data (hereinafter, “personal data” or also “data”) provided by the Client:

**a.** Without having to obtain your explicit consent, for the following purposes:

- pre-contractual activities aimed at the proposal of offers and the establishment of the contractual relationship for the provision of the Controller's services (such as for example in the case of contact details collected directly from the interested data subject or otherwise publicly available);
- to fulfil contractual, administrative and fiscal obligations arising from relationships in force (like fiscal data for the issuance of the invoice and relevant payment even if electronic, or contact details necessary for the registration and access to restricted areas on online platforms or mobile applications);
- fulfil the obligations established by the specific contractual terms of the requested service and/or by any binding accreditation and/or certification requirements (such as the collection of audit evidence or other supporting documentation, also containing special categories of personal data defined at art. 9 GDPR such as health certificates, if required by law or by reference standard and therefore mandatory to obtain the service itself, provided both through traditional and digital methodologies, or furnished by remote tools);
- to fulfil the obligations imposed by law or by an order of the competent Authority;
- to exercise the Controller's rights, such as the right of defence in a lawsuit.

**b.** Only with your prior consent, for the following promotional purposes:

- to send you e-mails, post, sms and/or telephone calls, newsletters, commercial communications, and/or advertising materials on products or services offered by the Controller, and to measure the level of satisfaction with the quality of such services.
- to use your images, photos and videos, taken on the occasion of the provision of the service, to document the success of the initiative, with the possibility of publication on the website [www.rina.org](http://www.rina.org), on the Company's official social media channels, or others external communication channels selected from time to time.

### **3. PROCESSING METHOD**

The Controller will process personal data in accordance with the principles of lawfulness, fairness and transparency.



Your personal data are processed by means of the following operations: collection, recording, organisation, structuring, storage, consultation, adaptation or alteration, use, dissemination, disclosure by transmission, retrieval, alignment or combination, restriction, erasure or destruction of the data. Your personal details are subjected to both hard-copy and electronic processing.

The Controller will process the personal data for the time necessary to carry out the purposes indicated above and, in any case, for not more than 30 years from termination of contractual relations and not more than 2 years from collecting data for marketing purposes.

Once 10 years have passed since the contractual relations have ceased, access to the data will be limited to heads of departments.

Should the Controller have a documented need to store the data for a period longer than 30 years (e.g. if erasure could compromise its legitimate right to defence or in general, to safeguard its company assets), such further storage shall take place, limiting access to said data to the head of the legal department only, in order to guarantee the legitimate exercising of the right of defence of the Controller.

#### **4. RECIPIENTS OF THE DATA**

Your data may be made accessible for the purposes indicated in art 2.a and 2.b to the following recipients:

- affiliate companies or subsidiaries of RINA Group, in Italy and abroad, to the extent to which this is necessary for processing, in conformity to the binding corporate rules adopted by RINA Group;
- companies or other third entities (credit institutions, professional firms, consultants, insurance companies for providing insurance services, auditing companies, supervisory institutions, etc.) who carry out activities on an outsourcing basis, on the Controller's behalf;
- public entities, for fulfilling legal obligations.

Without requiring your explicit consent, the Controller may communicate your data for the purposes indicated in art 2.a to supervisory bodies, judicial authorities, insurance companies for providing insurance services, as well as to entities to which communication is mandatory in terms of the law, for carrying out said purposes.

#### **5. TRANSFERS OF DATA**

Personal data are stored on servers located within the European Union. In any case, it is understood that, should this be necessary, the Controller will have the right to move the servers even outside the EU. In such a case, the Controller hereby guarantees that transfers of data outside the EU will be done in accordance with the applicable laws, also by means of including standard contractual clauses provided for by the European Commission, and adopting binding corporate rules for intra-group transfers.

#### **6. LEGAL BASIS OF THE PROCESSING**

The provision of data and related processing for the purposes indicated in art. 2.a is necessary in order to guarantee the Controller's services you have requested, and for implementing the contract and any pre-contractual obligations. The legal basis of the aforementioned processing can be found in art. 6, par. 1, b) GDPR. Any refusal will make it impossible for the Controller to provide the services covered by the contract.

Providing data for the purposes indicated in art. 2.b, on the other hand, is not mandatory. You may, therefore, decide



not to provide any data or subsequently refuse processing of data already provided . The legal basis of the aforementioned treatment can be found in art. 6, par. 1, a) GDPR, the only consequence of such refusal will be that receiving newsletters, commercial communications, and advertising materials related to the services offered by the Controller will not be possible. However, you will continue to have the right to the services indicated in art. 2.a.

## 7. RIGHTS OF THE DATA SUBJECT

As the data subject, you have the right to:

- i. obtain confirmation of whether or not personal details regarding you are processed or not, as well as to obtain a copy of said data;
- ii. obtain an indication of: a) the source of the personal data; b) the purposes and means of processing; c) the logic involved in the case of processing done with the help of electronic instruments; d) the identity and the contact details of the controller, controller's representatives, processors and data protection officer; e) the recipients or categories of recipients to which the personal data can be communicated, or who can come to know the same as the designated representative within the territory of the State, processors, or employees who carry out processing;
- iii. obtain: a) updating, rectification, or completion of the data; b) erasure, transformation into an anonymous form or blocking of data processed in violation of laws; c) certification that the operations referred to in letters a) and b) have been made known, also in relation to their content, to those to whom the data have been communicated or disclosed by transmission, unless this is impossible or involves a disproportionate effort; d) a structured format, from the Controller, commonly used and provided in an intelligible and easily accessible form with the personal data related to you, and, where technically feasible, to obtain transmission of said data directly from one controller to another;
- iv. object to: a) processing of your personal data, even if pertinent to the purpose for which they were collected. b) processing of your personal data for the purposes of sending advertising or direct sales materials, or for carrying out market research or commercial communication, using automated telephone calling systems without an operator, by e-mail and or by means of traditional telephone and/or hard copy postal marketing methods. Such right of object may also be exercised only in part, thereby allowing the data subjects to choose whether to receive only communications using traditional means or only automated communications, or neither of the two types of communication.
- v. Therefore, in your capacity as Data Subject, you have the rights pursuant to Arts. 15 – 21 of GDPR, as well as the right to lodge a complaint with the competent Authority pursuant to art 77 of GDPR.

## 8. PROCEDURE FOR EXERCISING RIGHTS AND COMMUNICATIONS

The Controller has appointed a Data Protection Officer, who can be contacted for all matters related to processing of your personal data and the exercising of related rights.

Therefore, you may contact the Data Protection Officer at any time, using the following procedure:

- by sending a registered letter with notification of receipt to RINA S.p.A., via Corsica 12, 16128 Genova, for the attention of the Data Protection Officer, or by
- by sending an e-mail message to [rina.dpo@rina.org](mailto:rina.dpo@rina.org).

We wish to state that you have the right to withdraw the consent given at any time by writing to [rina.dpo@rina.org](mailto:rina.dpo@rina.org).



**I declare that I have examined the notice and accept its contents.**

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(Signature of the Data Subject)

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(Place & Date)

For the purpose of receiving e-mails, post, sms and/or telephone calls, newsletters, commercial communications, and/or advertising materials on products or services the Controller offers, and to measure the degree of satisfaction with the quality of such services (non mandatory consent).

**I give my consent**

**I do not give my consent**

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(Signature of the Data Subject)

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(Place & Date)

For the purpose of using your images, photos and videos, taken on the occasion of the provision of the service, to document the success of the initiative, with the possibility of publication on the website [www.rina.org](http://www.rina.org), on the Company's official social media channels, or others external communication channels selected from time to time.

**I give my consent**

**I do not give my consent**

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(Signature of the Data Subject)

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(Place & Date)