

WILSON CYPRUS INSURANCE BROKERS LIMITED

Complaints Handling Policy

1. Introduction

Wilson Cyprus Insurance Brokers Limited (hereinafter the "**Company**" or "**we**" or "**our**" or "**us**") upholds effective and transparent procedures for prompt complaint handling relating to the insurance distribution activities of the Company and maintains records of complaints and measures taken for complaint resolution, in line with the Law on Insurance and Reinsurance Business and other Related Issues of 2016 – 2020 or any law substituting or amending the same (hereinafter the "Law"), as well as with the relevant Guidelines and Regulations issued by the Superintendent of Insurance of Cyprus and the Law Relating to the Establishment and Operation of a Single Agency for the out of Court Settlement of Disputes of Financial Nature (Financial Ombudsman) of 2010-2020 or any law substituting or amending the same.

2. <u>Scope of the Policy</u>

This Policy provides the procedures to be followed by all complainants (hereinafter the "**Complainant**" or "**you**" or "**your**" or "**yourself**") wishing to lodge a complaint as well as the procedures followed by the Company for the handling of all complaints lodged by clients and other interested parties.

What constitutes a complaint?

Complaint is a statement of dissatisfaction addressed to the Company by a person relating to the insurance distribution activities of the Company.

In cases where a complaint does not constitute an eligible complaint, i.e. in cases where a complaint refers to activities other than those supervised by the Superintendent of Insurance of Cyprus (hereinafter the "SI") and regulated in accordance with the Law or a complaint is made for another financial institution under the legal provisions applicable to that institution, the Company should respond, where possible, explaining the reasons why the Company is not the right person to complain to.

In addition, in cases where a complaint is received by the Company for which the insurance company (on behalf of which the Company provides insurance distribution services) is responsible and the Company does not handle the complaint on behalf of the relevant insurance company, the Company should inform you and direct the complaint to the relevant insurance company. In case where the complaint relates to another financial institution, the Company should follow the same procedure, as long as the said financial institution is identifiable.

3. <u>Complaint Procedure</u>

Complaints can be made verbally or in writing (including by electronic communication). If you wish to lodge a complaint, you may do so in one of the following ways:

- By telephone, at 0207 626 9888;
- Electronically at the email of the person who handles your account or at wilson@wilsoneurope.com;
- By post at 19 Anniva Francis Street, Ria Court 57, Flat 401, 6031 Larnaca, Cyprus.

Where the complaint is submitted in writing, you must fill and submit, as described above, a duly completed and signed Complaints Form (Appendix 1), with the following information:

- i. your name and surname;
- ii. contact details;
- iii. a brief description of the issue (please note that you must not include offensive language directed either to the Company or any of its employees);
- iv. name of Company's employee that the client had contact with and/or the relevant department;
- v. supporting evidence of the complaint.

If the complaint is received by telephone, the relevant individual contacting you on behalf of the Company will keep full written notes of such telephone discussion, direct you to the Complaints Form for your completion or complete the Complaints Form on your behalf, should you do not wish to complete this yourself. In such a case, you will need to at least provide all adequate supporting evidence to support your complaint either by post or email, as per the details provided above.

After receiving the complaint, the Company shall acknowledge in writing, to each Complainant, within two (2) working days, the receipt of the complaint.

4. <u>Responding to the Complaint and Timescale</u>

Every complaint is regarded as high priority by the Company, and it is therefore acknowledged within two (2) working days in writing by way of an email or letter. The response shall provide the name of the person handling the complaint.

A final written response on the complaint shall be provided within fifteen (15) working days if a decision can be taken within this period.

When a response cannot be provided within the aforementioned time limits, the Company will inform the Complainant in writing about the causes of the delay before the expiry of the deadline and indicate the time period within which the Company's investigation is likely to be completed.

The additional time limit will not be more than thirty (30) working days from the expiry of the initial deadline of the fifteen (15) working days.

When replying to you whether in fifteen (15) or forty-five (45) working days, as the case may be, the employee responsible for handling the complaint shall provide you with a letter or email responding to you.

On request or when acknowledging receipt of a complaint, the responsible employee shall provide you with written information regarding our complaints-handling process. In any case, the responsible employee shall, during the investigation stage, keep you informed about the progress of the handling of the complaint, as well as when and if requested by you.

5. <u>Alternative Dispute Resolution (ADR)</u>

When providing you with a final decision that does not fully satisfy your demand, the responsible employee will include a thorough written explanation of the Company's position on the complaint and set out explicitly your option to insist on the complaint and to appeal to The Financial Ombudsman of the Republic of Cyprus or through the ODR platform or to the relevant Courts of Justice.

The Financial Ombudsman of the Republic of Cyprus

The Financial Ombudsman is an independent service, competent amongst others for settling disputes between financial firms and their clients. More information on the Financial Ombudsman of Cyprus can be found in its website: http://www.financialombudsman.gov.cy.

If you believe that your complaint has not been handled in a fair and equitable manner by the Company, you have the right to refer the matter to the Financial Ombudsman.

If you wish to escalate your complaint, you are advised to submit your complaint to the Financial Ombudsman of the Republic of Cyprus, with all relevant information/documentation and evidence of your complaint, at:

- By hand or by post to the address: 15 Kypranoros, 1061 Nicosia, Cyprus or P.O. Box. 26722, 1647 Nicosia, Cyprus
- > By email to: complaints@financialombudsman.gov.cy
- > By fax to: +357 22 660584 or to +357 22 660118

Online Dispute Resolution (ODR)

Any consumer buying on-line insurance has the option to register their complaint via the European Commission's online dispute resolution platform using the following link: http://ec.europa.eu/odr.

Civil Action

In case you are not satisfied with the decision issued by the Financial Ombudsman or the ODR, you may refer to the relevant Courts of the Republic of Cyprus.

Appendix 1 – Complaints Form

COMPLAINTS FORM			
Way of Communication:	Email	Tel 📃	Letter
Complainant Details			
Name:		Surname:	
Legal Entity Name (if applicable):			
Address:			
Post Code:	City:		Country:
Contact Telephone Number:			
Email:			
Name of Company's employee that you had contact with and/or the relevant department:			
Brief description of the complaint (please note that you must not include offensive language directed either to the Company or any of its employees)			
*** Please enclose any supporting documentation that may enable us to handle and resolve the complaint.			
I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.			
Signature:		Date:	