

COMPLAINTS HANDLING PROCEDURE

IT Management Santora B.V. (**“Santora”**
or **“The Company”**)

1 Version Control

Name	Description
Document Name	Complaints Handling Procedure
Version	1
Author	Santora – Compliance Department
Authorised By	The Board of Directors
Distribution Date	2024
Review Date	

Version	Description	Date	Initials
1	Policy implementation	2024	JH

2 Contents

1	VERSION CONTROL	2
2	CONTENTS	3
3	SCOPE OF PROCEDURE	4
4	RECEIPT AND RECORDING OF COMPLAINTS	4
5	COMPLAINT INFORMATION	5
6	COMPLAINTS HANDLING	5
7	CONFIDENTIALITY AND DATA PROTECTION	6

3 Scope of Procedure

This Complaints Handling Procedure applies to Complaints pertaining to the provision of services by the Company or to the Company's customer service and employees.

For the purposes of this Complaints Handling Procedure, any reference to the Santora also includes the Santora's employees.

Complaints may relate to any of Santora's activities and or services and may include (but not be limited to):

- The quality of Santora's customer service;
- The behaviour and/or professional competence of the Santora's employees;
- Delays, defects, system errors or any other problems associated with the provision of services;

The following do not constitute Complaints. Customers raising such questions or matters should be raised through a ticket on the website:

- General questions about Santora's services;
- General questions relating to offers and promotions;
- Formal requests for the disclosure of information including, but not limited to, the GDPR.

4 Receipt and Recording of Complaints

Customers may make Complaints using any of the following methods:

- In writing, addressed to Santora B.V., at the Registered address of {Insert Registered office address}; or
- By email, addressed to Support team, the Company at {insert email address}; or
- By live chat, located on Santora's website within the on the footer of the website.

Upon receipt of Complaints, the following steps shall be taken as soon as reasonably practicable:

- If a written Complaint is received by post, Head of Customer Support shall log the complaint on Santora's complaints register; or
- If a written Complaint is received by email, Head of Customer Support shall log the complaint on Santora's complaints register; or
- If a complaint is received via live chat, a member of the Customer Support team collates the information and passes it onto Head of Customer Support, who logs the complaint on Santora's complaints register.

All Complaints shall be given a Complaint identification number and the investigation thereof shall begin within one (1) Business Day.

Where practicable, all Complaints shall be acknowledged in writing within one (1) business day of receipt. The acknowledgement shall inform the Customer of their Complaint Reference Agent, by whom their Complaint is to be handled.

Once a final decision has been made, a notification will be sent to the Complainant's preferred method of contact. Only once the Company's full complaints handling procedure has been followed and completed can the Complainant seek external resolution from an Alternative Dispute Resolution entity ("ADR").

5 Complaint Information

Customers are advised in Santora's Complaints Policy that the following information should be provided in as much detail as is reasonably possible when making a Complaint:

- The Customer's name, address, telephone number and email address, indicating any preferred method of communication;
- Further details of the Complaint including, as appropriate, all times, dates, events, and people involved;
- Details of any documents or other evidence on which the Customer wishes to rely in support of the Complaint;
- Details of how the Customer would like the Company to resolve the Complaint. Whilst the Company will make all reasonable efforts to accommodate such requests, however, the Company is not bound to take any action beyond that which Santora may be contractually or otherwise legally obliged to take.

6 Complaints Handling

The following staff members are qualified and eligible to handle Complaints:

- Head of Customer Support
- Head of Risk Management

Upon receipt of a Complaint, the Complaint shall be considered, and a decision made within fourteen (14) Business Days whether to:

- Investigate the Complaint fully if it is valid, in which case the procedure should resume from Section 6.3; or
- Dismiss the Complaint if it is invalid, in which case the Customer shall be informed of the decision in writing within fourteen (14) Business Days.

Subject to delays arising from circumstances beyond Santora's reasonable control or beyond the reasonable control of the staff member handling the Complaint (including, but not limited to, delays in other persons responding to communications), Complaints shall be fully investigated, decided upon and a Recommendation made within fourteen (14) Business Days;

If the Complaint relates to (a) particular employee(s), (a "Complaine" or "Complainees"), the Complaine(s) in question shall be informed of the Complaint and a meeting shall be arranged as required to discuss the Complaint. In such cases, the Complaine(s) should not, under any circumstances, contact the Customer directly regarding the Complaint. If the Customer contacts the Complaine(s) directly regarding the Complaint, the Complaine(s) should respectfully refuse to discuss the matter. Any such contact should be reported to the Company.

If additional information or evidence in support of the Complaint is required, the Customer shall be contacted using the Customer's preferred method of communication, stating clearly what information or evidence is required. Customers should be respectfully reminded that any delay in their response to such a request may delay the resolution of their Complaint.

If a Customer is unable or unwilling to provide information or evidence requested, reasonable endeavours shall nevertheless be used to resolve the Complaint. If, however, it is not possible to uphold the Complaint in the absence of the requested information or evidence, the Complaint may be closed, and the Customer informed of the outcome.

The Complaint shall be examined and evaluated, taking full account of all relevant statements, information, evidence and circumstances. Full objectivity and fairness shall be maintained always.

During the investigation of the Complaint, all records, information, employees that may be necessary to enable an impartial and thorough investigation shall be made available.

Access to the following records and/or information is restricted and shall require the authorisation of senior management;

- a) Suspicious Transaction or Activity Reports, noting that in accordance with Santora's AML / CFT manual, no further correspondence regarding the Suspicious Transaction or Activity Report will be held with the Complainant, unless advised by the Company's Officer; and
- b) Reports disclosed to the Financial Investigation Unit.

Following examination of the Complaint, a decision shall be reached within the time period (subject to the exceptions noted therein).

Once a decision has been made, recommendations shall be reviewed by Head of Risk Management within 1 (one) Business Day before the Customer may be informed of the outcome.

In the event that the Head of Customer Support does not agree with the decision and/or Recommendation they shall give reasons for such disagreement and the decision and/or Recommendation shall be reconsidered by the staff member responsible for investigating the Complaint within five (5) Business Days. If, following resubmission to the Head of Risk Management, they still do not agree with the decision and/or Recommendation, the Head of Regulatory Compliance's preferred decision and/or Recommendation shall be final.

Once a decision has been approved or a final decision made, a notification shall be sent to the Customer by their preferred method of contact. The Customer shall also be reminded of their right to seek External Resolution of their Complaint in accordance with Section 6 below.

If a delay either occurs or is considered likely to occur at any stage of this procedure, the Customer should be informed using his or her preferred communication method. The Customer should be informed of the length or likely length of the delay and the reasons therefor.

7 Confidentiality and Data Protection

All Complaints, appeals, evidence and other information gathered, held and processed under this Complaints Handling Procedure shall always be treated with the utmost confidence. Such information may be shared with employees of the Company only to the extent required to resolve the Complaint in question in accordance with this Complaints Handling Procedure.

In the event that the details of a Complaint are to be used for training or quality improvement purposes, in which case they may be shared with other employees of the Company beyond the scope of this Complaints Handling Procedure, the relevant Customer's express permission must first be sought using that Customer's preferred contact method. Personal details (that is, anything that may be used to identify the Customer) shall be removed from all information so used. Such permission may be revoked at any time in accordance with the Customer's right to do so.

All personal information collected by Santora (including, but not limited to, Customers' names and contact details) shall only be collected, used and held in accordance with the provisions of the Personal Data Protection Ordinance Curacao and our Customers' rights under that Act.

End of document