

Complaints Management Policy – Client Summary



BLACKTOWER
FINANCIAL MANAGEMENT GROUP

Blacktower Insurance Agents & Advisors Ltd (hereinafter, the “Company”), is required to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from clients, and to keep a record of each client complaint and the measures taken for its resolution.

Submitting a Complaint:

All Client complaints must be submitted in writing addressed to the compliance officer, signed by the complainant or a person authorised to act on behalf of the client and should be as descriptive as possible in respect of the events that led to the filing of the complaint. Complaints which are unsigned and do not contain the name and other details of the complainant will not be considered.

Clients are encouraged to use the *Complaints Form* attached herein and submit it in any of the following ways:

1. Electronically at the following email address: infocyprus@blacktowerfm.com; or
2. By sending it in writing by post to: 18 Evagoras Christophorou, Petoussis Building, Office 401, 3030, Limassol, Cyprus.

Acknowledging a Client Complaint:

The Company will acknowledge receipt of your complaint within two (2) business days of receipt. Please note that a **unique reference number** will be assigned to your complaint and it must be used in all future correspondence with the Company.

Handling a Client Complaint:

Once we acknowledge receipt of a complaint, we will review it carefully and will try to resolve it without undue delay. The compliance officer may contact the complainant directly in order to obtain further clarifications and information relating to the complaint. The cooperation of the complainant is needed in order to handle the complaint as reasonably and promptly as possible.

All complaints should be resolved promptly and within a maximum of fifteen working (15) days from the date of its official receipt. In case that an answer cannot be provided within the expected time limit mentioned above, we will inform the complainant about the causes of the delay and we will indicate when the Company’s investigation is likely to be completed. The additional time limit should not be more than thirty (30) working days from the expiry of the initial deadline of the fifteen (15) working days.

Decision on a complaint:

We will inform the complainant of the outcome of our investigation together with an explanation of our position and any remedy measures we intend to take (if applicable).

If the complainant is still not satisfied with our final decision, he/she may maintain his/her complaint through the Financial Ombudsman service of the Republic of Cyprus, the ADR Mechanism, or any relevant Court.

- **Contact Details of the Financial Ombudsman of the Republic of Cyprus:**

Website: <http://www.financialombudsman.gov.cy>

General email: complaints@financialombudsman.gov.cy

Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus

Telephone: +35722848900

Fax: +35722660584, +35722660118

You may wish to raise your complaint with the Cyprus Insurance Companies Control Service (ICCS); however, it should be noted that the ICCS does not have restitution powers and therefore does not investigate individual complaints. Contact Details of the Cyprus Insurance Companies Control Service:

Website: <http://mof.gov.cy/en/directorates-units/insurance-companies-control-service>

Email: insurance@mof.gov.cy

Postal Address: P.O. BOX 23364, 1682 Nicosia, Cyprus

Telephone: +357 22602990

Fax: +357 22302938

It is understood that the complainant's right to take legal actions remains unaffected by the existence or use of any complaint's procedures referred to above.

Resolutions of disputes with customers:

In applying high ethical standards, the Company, when providing services to clients acts honestly, fairly and professionally in the client's best interests.

The Company extends every effort to handle client complaints honestly, fairly and professionally in the Clients' best interests. In each and every case the compliance officer and other managers and staff members involved in the complaint investigation should strive to arrive at a mutually satisfying solution should it occur, that a complaint is founded on reasonable grounds and the compensation demanded is reasonable and fair.

COMPLAINTS FORM

DATE:

CLIENT INFORMATION

Name

Policy Number

Product Provider

CONTACT DETAILS OF THE CLIENT

Postal Address

Telephone Number

Email

DETAILS OF THE COMPLAINT

Description of the Complaint: (use a separate sheet if necessary)

FOR OFFICIAL USE ONLY

Received on

Received by

Assigned to

To reply by