

Complaints & Disputes Policy

English

Aspect Labs Europe



Complaints & Disputes Policy

1. Introduction:

The societe anonyme company under the name "Aspect Labs Europe Insurance Agents Single-Member Sigle Member Societe Anonyme Company" and trading as "Aspect Labs Europe S.A." (henceforth the "Company") is established, operates, and is legally represented in accordance with the provisions of Greek law and has a registration number for public limited companies of CGR 182727703000, Tax Identification Number 802785392 / KEFODE ATTIKIS, is based in Athens, at 171 Syngrou Avenue, Nea Smyrni, 171 21, is legally registered with the Athens Chamber of Commerce under registration number 445622 (in the special register as an insurance agent with registration number 10160 and as an insurance agent coordinator with registration number 1711) and legally provides insurance mediation/distribution services for insurance products.

As part of our activities as insurance agents and coverholders, we adopt and implement a Complaints & Disputes Policy (henceforth the "Policy"), pursuant to Law 4583/2018 and Act No. 89/5.4.2016 of the Executive Committee of the Bank of Greece entitled "Complaint Management by Insurance Intermediaries," which sets out the procedure for handling complaints by insurance intermediaries, as well as their relevant organisational obligations. This policy has been approved by the Company's management in accordance with the decision of its Board of Directors dated

2. Objective:

With this Policy, the Company undertakes to make every effort to manage complaints from its customers and/or third parties in a prompt, objective, and impartial manner, in accordance with the applicable legislation on the distribution of insurance products, based on good faith through the collection of all relevant data and information, with respect for the protection of personal data.

Our goal is to continuously improve the services and products we provide to our customers. Effective complaint management is extremely important for the Company to provide quality services and products.

It is clarified that, in accordance with Articles 1 & 2(a) of the above-mentioned Act of the Bank of Greece, the above act does not apply when: "an insurance intermediary receives a complaint relating to activities other than those supervised by the Bank of Greece."

3. Definitions:

A "complaint" is a written statement of dissatisfaction addressed to an insurance intermediary by a person who is the recipient of the insurance intermediary's services, in accordance with the legislation on the distribution of insurance products. Complaints do not include notices of claims or requests for compensation, nor simple requests relating to the performance of the insurance contract and the provision of information or clarifications.

A "complainant" is defined as a person who is deemed to be eligible to lodge a complaint for consideration by an insurance intermediary and who has already lodged a complaint, such as the counterparty, the insured, the beneficiary of compensation, and/or the injured third party.

4. Complaint Handling Procedure

4.1 Submission of Complaints

- 4.1.1 Insured persons and/or third parties who wish to submit a complaint must provide the Company with at least the following information:
- Personal details of the complainant (including their contact details)
 - Line of Business to which the complaint relates
 - Description of the complaint/claim/statement of dissatisfaction and the desired solution or request.
- 4.1.2 Complaints shall be submitted to the Complaints Management Officer. All complaints must be submitted in writing via:
- By e-mail:
 - By post to: Aspect Labs Europe S.A. (for the attention of the Complaints Manager, Mr/Ms, 171 Syngrou Avenue, Nea Smyrni, 171 21)
- 4.1.3 The Company reserves the right to request the identification of such persons in accordance with national and EU legislation on the protection of personal data processing.

4.2 Complaints Handling Register

- 4.2.1 The Company keeps a register of complaints and related files, where the necessary details of the complaints submitted are recorded. The minimum content of each entry is as follows:
- a. The date of submission of the complaint by the Complainant and the date on which the relevant file was closed
 - b. The Complainant's identification details
 - c. A summary description of the specific complaint
 - d. The insurance sector to which the complaint relates, and
 - e. The outcome of the complaint.
- 4.2.2. The Company keeps a complete set of documents relating to the handling of each complaint separately in a secure file. The relevant file is kept in accordance with the provisions of national and EU legislation on the protection of personal data for a period of five (5) years, and in the case of pending court cases, until their final adjudication.

4.3 Complaint Handling Procedure:

- 4.3.1 Upon receipt of the complaint by the Company, the complainant shall receive, as soon as possible, proof of receipt, accompanied by a description of the procedure to be followed, the contact details of the person or department responsible for handling the complaint, and the type of information that the complainant needs to provide to the Company for a full investigation of their complaint. The Company will also inform complainants that the activation of the complaint examination mechanism does not interrupt the statute of limitations on their legal claims.
- 4.3.2 The Company will make every effort to resolve the complaint as soon as possible and in any case within the legal deadline, i.e. within fifty (50) days of receipt. The Company will forward the questions/requests to the relevant insurance company. For simple questions/requests, the customer-consumer who made the complaint will receive a response from the Company or directly from the insurance company as soon as possible and no later than fifteen (15) days from receipt of the relevant request. In the case of written statements of dissatisfaction/complaints addressed

to the Company concerning its duties as an Insurance Mediator, it should be noted that the latter has appointed a person responsible for coordinating the proper and timely handling of written complaints submitted, which are answered within a reasonable time, within a maximum period of fifty (50) calendar days.

4.3.3 The exercise of this right does not limit the rights of the customer-consumer to seek legal protection. It should be noted that the submission of a written complaint/statement of dissatisfaction/claim to the Company through this procedure does not interrupt the limitation period/statute of limitations of the claim. In any case, the Company shall inform the Complainant of the progress of the examination of their complaint within a reasonable time and/or upon their request. The Company is obliged, within a legal period of fifty (50) calendar days from the date of submission of the complaint, to complete the examination of the complaint and send a written and reasoned response to the complainant, either by the same means by which the complaint came to its attention or by any other means using the complainant's available contact details. In addition, in this response, the Company shall expressly inform the complainant that they have the right to persist with their complaint. Any exceeding of the above deadline of fifty (50) days shall be justified in writing to the complainant and the new deadline for completing the processing of the complaint shall be specified.

4.3.4 If a mutually acceptable solution cannot be reached, the Company will inform the complainant of the authorities to which they may refer for the out-of-court resolution of their complaint, within the specified deadlines, for the out-of-court resolution of their complaint. For example, the complainant may refer to:

- Bank of Greece (Private Insurance Supervision Division)
El. Venizelou 21, Athens, P.C. 102 50
Tel: 210 3201111
<http://www.bankofgreece.gr/Pages/el/deia/default.aspx>
- Ministry of Labor & Social Security (Occupational and Private Insurance Supervision Directorate)
Kanigos Square, Athens, Postal Code. 101 81
Tel: 1520
<http://www.efpolis.gr/>
- Consumer Advocate
Avenue Alexandras 144, Athens, Postal Code. 114 71
Tel: 210 6460612
<http://www.synigoroskatanaloti.gr/>
Complaints addressed to the Consumer Ombudsman must be submitted within one (1) year after you have become fully aware of the harmful act or omission.
- Lloyd's Insurance Company S.A.
lloydseurope.complaints-notification@lloyds.com

4.3.6 In managing each complaint, the Company will analyze and record any weaknesses and deficiencies in its internal procedures, while the responsible individuals and departments of the Company will make proposals to eliminate them. In any case, at the end of each calendar year, the Complaints Officer will submit a report to the Management and the Responsible Natural Person for the Insurance Mediation of the Company, informing them about both the number and the nature and progress of resolving the complaints submitted during the year, as

well as recording any weaknesses and deficiencies in its internal procedures and making proposals for their elimination.

4.3.7 The Company will provide the Bank of Greece, whenever requested, with any kind of information or written update for the examination of the claims concerning it.

5. Validity – Approval – Amendments

5.1 This Policy came into effect with the decision of the Board of Directors of the Company dated Decision of the Company's Board of Directors, brought to the attention of the relevant personnel and has been posted on its website

5.2 The Policy is reviewed and updated whenever deemed necessary by the Company's Management, and its amendments are approved by its Board of Directors, with the updated version being posted on its website.

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