



# Customer Complaints Handling

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## **In General**

A complaint is any verbal or written expression of disagreement or dissatisfaction by a customer or by a 3<sup>rd</sup> party (vendor, partner etc) regarding a service or product offered in accordance to Law 4354/2015, as in force.

Special Financial Solutions S.M.S.A. implements a sound, effective and efficient procedure for managing customer complaints, in view of the high level of reputational risk inherent in a reply that is inappropriate or not addressed promptly and taking into account the possible legal or compliance consequences.

The purpose of this procedure is:

- To establish, implement and maintain effective and transparent procedure for the reasonable and prompt handling of complaints received and of the measures taken for the resolution.
- To examine and resolve customer complaints and settle the differences with the least possible discomfort of all the parts involved.
- To analyse the problems encountered, to identify the causes and to report any customer suggestions regarding the improvement of the services and the products offered.

This procedure will be reviewed and updated on regular basis, by Compliance Department in order to be in compliance with the regulatory framework and to ensure transparency and high level of customer or 3<sup>rd</sup> parties' satisfaction.

The review shall include due consideration of the following:

- Instructions / requests for updating the procedure received from the Board of Directors,
- Requests for updating the procedure received from Internal Audit. The observance of the relevant procedures shall be subject to control by the Internal Audit.

This documented procedure and its amendments is communicated to all personnel.

## **Submission of the Complaints**

A complaint may be submitted:

## **1. IN WRITTEN FORM**

- By filling the CUSTOMER COMPLAINT FORM (Form No 1). The form is uploaded on the Company's internet site under section: "Contact us" and may be submitted by e-mail at the Company's generic mailbox: [info@sfs-sa.gr](mailto:info@sfs-sa.gr) to the attention of Complaints Unit or
- By sending a letter to the Company's postal address to the attention of Complaints Unit (Special Financial Solutions S.M.S.A., Filellinon 1 & Othonos, 105 57 Athens, Greece), indicating contact details, so that the Company can provide follow-up or
- By fax to the Company's fax number: + 30 210 3235442 to the attention of Complaints Unit or
- By sending an e-mail at the Company's generic mailbox: [info@sfs-sa.gr](mailto:info@sfs-sa.gr) to the attention of Complaints Unit or
- By extra-judicial letter or bailiff.

## **2. VERBALLY**

With regard to verbal complaints, these should not include any kind of trivial queries or sign of disturbance from the client on matters of day-to-day cooperation. Only strong verbal disputes should be included in the definition of a verbal complaint.

Verbal complaints can be made either over the designated phone number (tel no: +30 210 3200014), either during a face to face meeting. In case that the issue could not be resolved, the employee contacted should ask the customer whether he wishes to record a verbal complaint. In affirmative, the employee should fill in the CUSTOMER VERBAL COMPLAINT FORM (Form No 2), after duly notifying the complainant about the process to be followed and giving information on the processing of his personal data, as described below in detail.

### **Management of Complaints**

Complaints must be analyzed as soon as possible. The Company has established a Complaints Unit under the responsibility of George Petrakos, Head of Portfolio

Administration. To secure the proper management of such issues and ensure their correct and timely treatment, the following steps should be applied:

1. Apart from the submission methods mentioned under (1) and (2) above, complaints may be received through different channels (electronically through e-mail, by fax, in hard copy) and in different forms (Word document, PDF files or even handwritten hardcopies). Complaints may also be directly received by members of staff from various Departments.
2. In all cases, complaints must be immediately forwarded to the Complaints Unit and Compliance Department, after they have been given a protocol number by the Reception to the written complaints (i.e. Complaint forms as per the Annexes of the present Procedure and in any other complaint letter).
3. The Complaints Unit/ Head of Portfolio Administration informs the Management and the Internal Audit Unit on the receipt of the complaint. Subsequently, he sends an acknowledgment of receipt to the complainant, whereby it is acknowledged that the Company has received the complaint and will proceed to its examination. The acknowledgment contains a link to the Company's site, where the complainant may easily access the Company's Customer Complaints Procedure.
4. Compliance department keeps a detailed record of complaints reported by any recipient of customer complaint. Complaints are recorded in the Complaints Register, including the following details:
  1. Date the complaint file was received
  2. Complainant's name
  3. Nature of the complaint
  4. Date of reply
  5. Status: Open/ Resolved
  6. Other notes (if applicable) & short description

The detailed records are kept in electronic folders by the Compliance Officer, as well as in hard copies by the Head of Portfolio Administration, under controlled access.

5. The Head of Portfolio Administration calls for a meeting or initiates e-mail correspondence, where the following functions participate:
  1. Legal (internal or external)

2. Compliance and
3. Any other involved function

The analysis of a complaint has as main purpose:

1. To define the degree of severity
2. To gather all information/data required for preparing the Company's reply

The meeting ends up to an action plan specifying the nature of the actions to be taken, who shall be responsible for taking them, as well as their respective schedules of implementation.

6. A reply to the customer complaints is expected to be submitted within ten (10) working days from the date of receipt the complaint, while the maximum period indicated by the Bank of Greece is forty-five (45) calendar days. When, for important reasons, it is not possible to provide a reply within the above timeline, the Head of Portfolio arranges for a letter to be sent to the customer in which the cause of delay is explained, as well as the time period within which the Company will provide the response to the customer.
7. A copy of the reply is also submitted to the Compliance Officer for purposes of updating the record monitor and for following-up on various actions decided, as well as for maintaining a progress status report of the respective Action Plans established.
8. In case the Company does not respond to the complainant, rejects the complaint or in case the complainant is not satisfied with the resolution of his complaint, he has the right to address his complaint to the Hellenic Ombudsman for Banking-Investment Services (<http://hobis.gr/>). In all cases, the complainant reserves the right to file a lawsuit at any stage of the complaint.

## **Information about personal data**

### **INTRODUCTION**

Special Financial Solutions S.M.S.A., with registered seat at 1, Filellinon & Othonos street in Athens, acts as “ joint data controller” with “AMOEBΑ ISSUER DAC”, a designated activity company incorporated under the laws of Ireland, having its registered office at 32 Molesworth Street, Dublin 2, Ireland, with respect to the Debtors’ Data collected directly by the SFS to the extent necessary for SFS to comply with its lawful and regulatory obligations and particularly in the context and for the purpose of handling Debtors’ complaints. This information refers to the nature of personal data, the means and purposes of collection, any third parties with which this data is being shared, as well as the rights that Debtors have, according to Regulation 2016/679 of the European Union [General Data Protection Regulation] and Greek Law 4624/2019.

### **WHICH PERSONAL DATA WE COLLECT**

The authorized and especially trained employees of Special Financial Solutions S.M.S.A. are responsible for the collection and other processing of personal data obtained under the customer complaints procedure. Such information can be derived from any electronic or hard copy documents received in the context of customer complaints (e.g. e-mails, forms, contracts and other supporting documents).

### **WHY WE COLLECT IT**

The information and personal data in the context of customer complaints is collected in the legitimate interests of the Company to effectively assess and treat complaints and in order to comply with the Company’s regulatory obligations, as prescribed by the Bank of Greece (Executive Committee Act 157/1/02.04.2019).

### **WITH WHOM WE SHARE IT**

Personal data that is being processed in the context of customer complaints are transmitted, if necessary for the purpose of handling and responding to customer complaints, to AMOEBΑ ISSUER DAC. Such personal data is not disclosed or transmitted to third parties. Exceptionally, such personal data is disclosed and/or transmitted where applicable legislation so requires (e.g. to the Bank of Greece or the Ombudsman for Banking-Investment Services) and in view of pursuing or responding to legal claims.

## **HOW LONG WE KEEP IT**

All records and personal data related to customer complaints are kept for five (5) years after the final resolution of the customer complaint. After the said period, the information received is safely erased and destroyed, according to the applicable Company's Policies.

## **OUR COMMITMENTS**

Special Financial Solutions S.M.S.A. complies with its obligations under the General Data Protection Regulation by keeping personal data accurate and up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorized access and disclosure; by ensuring that appropriate technical and organizational measures are in place to protect personal data.

## **RIGHTS OF THE COMPLAINANT**

The complainant has the following rights, which can be exercised at any time, by addressing a request to our Company, without charge:

1. Right of Access: the complainant can request information on their personal data that is being held by the Company;
2. Right to Rectification: the complainant can request the rectification of inaccurate personal data or the completion of incomplete personal data;
3. Right to Erasure: the complainant can request the erasure of their personal data, where this data is no longer necessary for the purposes for which it was collected and processed provided that the Company is not obliged to retain data by any other legal or regulatory obligation;
4. Right to Restriction: the complainant can request the restriction of any processing of their personal data, where there is a dispute in relation to the accuracy or processing of data;
5. Right to Object: the complainant can object to the disclosure of their personal data (i.e. contact details) to the employee complained against, by putting forward reasonable explanations overriding the legitimate interests of that person.
6. Right to Data Portability: the complainant can request to receive their personal data, which they have provided to the Company, in a structured,



commonly used and machine-readable format and have the right to transmit those data to another controller.

If a complaint is submitted against an employee of Special Financial Solutions S.M.S.A., the employee has the right of access to the contents of such a complaint, as well as to the information about the complainant (e.g. his name and address). The employee also has the right to rectification, erasure, restriction or to object, as described above.

In case the complainant exercise the rights of rectification, erasure or restriction of their personal data, these requests will be communicated to any third party recipients to whom this data has been disclosed in the context of customer complaints.

## **CONTACT INFORMATION**

Any request regarding the processing of the complainant's personal data in the context of customer complaints, should be addressed to the responsible person for communication regarding data protection issues of our Company, using the following contact details:

Name: Foteini Vezou, Legal Advisor

E-mail : [f.vezou@sfs-sa.gr](mailto:f.vezou@sfs-sa.gr)

Postal address: Filellinon 1 & Othonos, 105 57, Athens, Greece

Phone number: +30 210 3200013

Name: Vassiliki Moiragia, Compliance/AML Officer

E-mail : [v.moiragia@sfs-sa.gr](mailto:v.moiragia@sfs-sa.gr)

Postal address: Filellinon 1 & Othonos, 105 57, Athens, Greece

Phone number: +30 210 3200006

Name: Konstantinos Kefalas, IT Manager

E-mail : [k.Kefalas@sfs-sa.gr](mailto:k.Kefalas@sfs-sa.gr)

Postal address: Filellinon 1 & Othonos, 105 57, Athens, Greece

Phone number: +30 210 3200022

In case the complainant feels that the protection of their personal data is violated in any way whatsoever, they can lodge a complaint with the Hellenic Data Protection Authority, using the following contact details:

Website: [www.dpa.gr](http://www.dpa.gr)

Postal Address: 1-3 Kifissias Ave., 115 23 Athens, Greece

Call Center: +30 210 6475600, Fax: +30 210 6475628

E-mail: [contact@dpa.gr](mailto:contact@dpa.gr)

Annexes – Complaint forms

**ΕΝΤΥΠΟ ΥΠΟΒΟΛΗΣ ΠΑΡΑΠΟΝΩΝ ΠΕΛΑΤΕΙΑΣ**

μ μ μ μ .  
μ 210-3200014 -

Στοιχεία Πελάτη	
*Επίθετο:	
*Όνομα:	
*ΑΔΤ <sup>1</sup>	
Δ/νση (αριθ/οδός/περιοχή/ πόλη/ τκ)	
*Τηλέφωνο επικοινωνίας:	
Κινητό Τηλεφωνο:	
Fax :	
E- mail:	
*Αν είστε εκπρόσωπος εταιρίας παρακαλώ συμπληρώστε την επωνυμία της & το ΑΦΜ της και τη θέση σας αυτή:	

μ \*

**ΠΕΡΙΓΡΑΦΗ ΠΡΟΒΛΗΜΑΤΟΣ**

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μ ,  
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- 1).....  
2).....

μ , μ ,

SPECIAL FINANCIAL SOLUTIONS S.M.S.A. μ

& μ μ .....

**ΕΝΤΥΠΟ ΠΡΟΦΟΡΙΚΩΝ ΠΑΡΑΠΟΝΩΝ ΠΕΛΑΤΕΙΑΣ**( μ  
S.M.S.A.)

SPECIAL FINANCIAL SOLUTIONS

<b>Τηλεφωνική κλήση</b>	<b>ΝΑΙ</b> <input type="checkbox"/> <b>ΟΧΙ</b> <input type="checkbox"/>	<b>Ημερομηνία</b> -	/ /
<b>Επίσκεψη</b>	<b>ΝΑΙ</b> <input type="checkbox"/> <b>ΟΧΙ</b> <input type="checkbox"/>	<b>Ωρα</b>	
		<b>Αρ. Πρωτοκόλου</b>	

<b>Στοιχεία Πελάτη</b>	
<b>*Επίθετο:</b>	
<b>*Όνομα:</b>	
<b>*ΑΔΤ<sup>2</sup></b>	
<b>Δ/νση (αριθ/οδός/περιοχή/ πόλη/ τκ)</b>	
<b>*Τηλέφωνο επικοινωνίας:</b>	
<b>Κινητό Τηλεφωνο:</b>	
<b>Fax :</b>	
<b>E- mail:</b>	
<b>*Αν είστε εκπρόσωπος εταιρίας παρακαλώ συμπληρώστε την επωνυμία της &amp; το ΑΦΜ της &amp; τη θέση σας σε αυτή:</b>	

<b>ΠΕΡΙΓΡΑΦΗ ΘΕΜΑΤΟΣ</b>

<b>ΑΙΤΗΜΑ ΠΕΛΑΤΗ</b>

**ΕΝΕΡΓΕΙΕΣ**

.....  
 .....  
 .....  
 .....

μ/μ : \_\_\_\_\_  
 : \_\_\_\_\_

## CUSTOMER COMPLAINT FORM

Please use this form. If you have any difficulties filling in this form just phone us on 210-3200014 – Mr George Petrakos

Customer Details	
<b>*Surname:</b>	
<b>*First Name:</b>	
<b>*ID/ PASSPORT NUMBER <sup>3</sup></b>	
<b>Address (Number-Street-Area-City- Zip Code):</b>	
<b>*Contact phone:</b>	
<b>Mobile phone:</b>	
<b>Fax :</b>	
<b>E- mail:</b>	
<b>*If you are complaining representing a Company: please fill in the Company's name, Tax registration number &amp; your position :</b>	

\* Obligatory fields

Description of the Complaint
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Please write down any relevant documents that you enclose:

- 1).....
- 2).....

I hereby solemnly declare knowing the consequences of the law of misrepresentation, that all information given in this form is complete and accurate and SPECIAL FINANCIAL SOLUTIONS S.M.S.A has the right to verify them at its discretion.

Place.....

Date.....

Signature

Form I

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<sup>3</sup> For identification purposes

<b>CUSTOMER VERBAL COMPLAINT FORM</b>
---------------------------------------

(Completed by Special Financial Solutions S.M.S.A Employees)

<b>Phone call</b>	YES <input type="checkbox"/>	NO <input type="checkbox"/>	<b>Date - Time</b>	/ /
<b>Face to face visit</b>	YES <input type="checkbox"/>	NO <input type="checkbox"/>	<b>Protocol No</b>	

Customer Details	
<b>*Surname:</b>	
<b>*First Name:</b>	
<b>*ID/ PASSPORT NUMBER<sup>1</sup></b>	
<b>Address (Number-Street-Area-City- Zip Code):</b>	
<b>*Contact phone:</b>	
<b>Mobile phone:</b>	
<b>Fax :</b>	
<b>E- mail:</b>	
<b>* If you are complaining representing a Company: please fill in the Company's name, Tax registration number &amp; your position ::</b>	

Description of the Complaint

Customer Request
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**ACTIONS TAKEN OR NEED TO BE TAKEN**

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.....

Employee Name/Surname : \_\_\_\_\_

Signature: \_\_\_\_\_

Form II

<sup>11</sup> For identification purposes