

# POLICY AND INFORMATION RELATED TO THE HANDLING OF COMPLAINTS Effective from: 17 October 2016

#### Dear Customer,

Thank you for choosing Erste Investment Ltd. to manage your finances. Our principal consideration is that we should develop and design our services and our products to your fullest satisfaction. Your comments, and any complaints you may have, are vital in this effort, as we can only improve and develop the quality of our services if we are aware of them. If, despite our best efforts, you should have a complaint during our operations, you will find the options for submitting your complaint and the most important information regarding the handling of complaints in this policy.

#### I. WAYS TO REPORT COMPLAINTS

You can report your complaint to our Company in the following ways:

- Oral complaint:
  - a) in person: at any branch of Erste Bank Hungary Ltd. acting as our Company's agent. The address and the opening hours of the branches are available at the official website of the Company (<a href="https://www.erstebank.hu">www.erstebank.hu</a>).
  - b) by phone:
    - between 8.00 and 17.30 on working days on the phone number 06-1-2355-151.
    - between 17.30 and 20.00 on the first working day of each week on the phone number 06-1-2355-111.
- Written complaint:
  - a) through a document handed over by you in person, or by someone else, at any branch of Erste Bank Hungary Ltd. acting as our Company's agent.
  - b) by post, to the following address:
    - ERSTE BEFEKTETÉSI ZRT. Központi Panaszkezelés [Central Complaints Management], 1138 Budapest Népfürdő u. 24-26.
  - c) by fax:
  - to fax number +36-1-2355-190
  - d) in an email sent to the following email address: info@ersteinvestment.hu

In the case of reporting a complaint in writing, you may also use the form published for this purpose on the website of the National Bank of Hungary (<a href="www.mnb.hu">www.mnb.hu</a>), which is available: <a href="http://www.mnb.hu/fogyasztovedelem/panaszom-van/formanyomtatvanyok">http://www.mnb.hu/fogyasztovedelem/panaszom-van/formanyomtatvanyok</a>

Customers may also report complaints through a proxy. If the customer is acting via a
proxy, the letter of proxy must be set forth in a notarised deed or a private deed of full
probative force.



#### II. INVESTIGATION OF COMPLAINTS

### Is a fee payable for the investigation of the complaint?

The complaint is investigated free of charge. The Company does not charge any special fee for it.

# What happens to your complaint?

Our Company investigates the complaint considering all relevant circumstances and judges it in a customer-friendly manner.

# 1. Oral complaint:

- 1.1 The oral complaint whether a complaint made in person or over the phone is immediately investigated, and if possible, remedied, by our Company. In the case of an oral complaint made over the phone, in order that a customer-service representative may answer the call in person within five minutes from the point at which a successful connection is made, our Company shall proceed as may reasonably be expected of it in the given situation. If it is not possible to investigate the complaint immediately, our Company will prepare minutes of the complaint.
- 1.2 In the case of an oral complaint given over the phone, kindly note that the conversation will be recorded.
- 1.3. The recording of phone conversations will be kept for five years.
- 1.4. At your request we provide you with an opportunity to listen to the recording, and will make available to you, free of charge, an authenticated transcript made of the recording.
- 1.5. If you do not agree with the way your oral complaint has been handled, our Company shall prepare minutes of the complaint and of your position on it.
- 1.6. In the case of a complaint reported in person, our service representative will hand over a photocopy of the minutes to you. In the case of a complaint reported by phone, this will be sent to you together with the response given to the complaint. In this case the response given to the complaint, which will include an explanation, must be sent by our Company to you within 30 calendar days following the reporting of the complaint.
- 1.7. If the legal regulations require that minutes be prepared, the minutes must include at least the following:
  - a) your name;
  - b) your address, your registered office and, if necessary, your mailing address;
  - c) place, time and method of reporting the complaint;
  - d) detailed description of the complaint, separately recording each objection to make sure that each objection covered by the complaint is investigated comprehensively:
  - e) customer number, number of the contract concerned by the complaint:
  - f) list of deeds, documents and other evidence presented by you;



- g) if immediate investigation of the complaint is not possible, signature of the taker of minutes and your signature;
- h) place and time of taking the minutes.
- i) Our Company's name and address

# 2. Written complaint

2.1. Our position related to the written complaint, which will include an explanation, will be sent to you within 30 calendar days following the reporting of the complaint.

#### III. DATA PROCESSING RULES RELATED TO THE COMPLAINT

# 1. What data, in particular, may be requested from you during the handling of your complaint?

- a) your name;
- b) your customer number;
- c) your address, registered office, mailing address;
- d) your phone number;
- e) method of contact;
- f) product or service concerned by the contract;
- g) description and cause of the complaint;
- h) your request in relation to the complaint;
- i) copies of the documents in your possession that are necessary to substantiate the complaint;
- j) power of attorney in the case of customers acting through a proxy;
- k) other data necessary for the investigation and answering of the complaint.
- 2. The data of the customer submitting the complaint will be treated in accordance with the provisions of Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

# IV. THE COMPANY'S OBLIGAITON TO PROVIDE INFORMATION REGARDING COMPLAINT HANDLING

#### What legal remedy options do you have if you do not accept our response?

- 1. Our main goal is to close any arising complaints to the satisfaction of both parties. Besides this, in the case of the rejection of the complaint, or the expiry without result of the 30-day statutory response deadline prescribed for the investigation of the complaint, any customer classified as a consumer may turn to the following:
- a) **Financial Arbitration Board** (in the case of a legal dispute related to the establishment, validity, legal implications and termination of the contract, or to a breach of the contract and the legal implications thereof): mailing address: 1539 Budapest Pf.: 670., telephone: +36-40-203-776, email address: ugyfelszolgalat@mnb.hu.
- b) Financial Consumer Protection Centre of the **National Bank of Hungary**, mailing address: Magyar Nemzeti Bank 1534 BKKP Pf. 777, telephone: +36-40-203-776, email address: ugyfelszolgalat@mnb.hu



- c) It is also possible to file a complaint with the **court** of relevant territorial jurisdiction.
- 2. In the case of the rejection of the complaint, or the expiry without result of the 30-day statutory response deadline prescribed for the investigation of the complaint, any customer not classified as a consumer may turn to the courts.
- 3. In the case of the rejection of the complaint, or the expiry without result of the 30-day statutory response deadline prescribed for the investigation of the complaint, any customer classified as a consumer will be notified by our Company on whether, with respect to his/her application, he/she may request the sending of the application form serving as the basis for the procedure to be launched before the Financial Arbitration Board or the Financial Consumer Protection Centre from our Company as well.

### V. RECORDING OF COMPLAINTS

### What sort of records does the Company keep of complaints that are received by it?

- 1. Our Company keeps an electronic record of the customer complaints it receives, and of the measures that are taken to settle or resolve them. This record includes
  - a. a description of the complaint, including a specification of the event or fact that constitutes the object of the complaint
  - b. the time of lodging the complaint
  - c. a description of the measure taken to settle the matter or resolve the complaint, and grounds for the complaint were rejected, the reason for such
  - d. the deadline for implementing the measure(s), and the name of the person(s) responsible for doing so
  - e. the date on which the letter of response to the complaint was posted.
- 2. The record of the complaint and the response to it is kept by our Company for five years.

This Complaint Handling Policy has been issued by our Company in accordance with the provisions of

- Act CXXXIX of 2013 on the National Bank of Hungary,
- Decree 28/2014 (VII. 23) of the Governor of the National Bank of Hungary on the Rules applicable to Complaint Handling by Financial Institutions,
- Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers and the Regulations Governing their Activities and
- Recommendation No. 13/2015 (X.16) of the National Bank of Hungary on the Complaint Handling Procedure of Financial Institutions.

The Policy can be viewed on our Company's official website (<a href="www.ersteinvestment.hu.hu">www.ersteinvestment.hu.hu</a>), and is also posted, in hard copy format, in our Company's premises that are open to customers.

Thank you for reading our Complaint Handling Policy!

Yours sincerely,

**ERSTE INVESTMENT LTD.**