

ERIX Biztosítási Alkusz és Tanácsadó Kft.
Complaints Handling Policy
(PKSZ-EN)

Effective date: 11 January 2022
No.: PKSZ-EN/1/2022.

I. Introduction

ERIX Biztosítási Alkusz és Tanácsadó Kft. (hereinafter: ERIX Kft., Company) announces the following Complaints Handling Policy to ensure the efficient, transparent and prompt handling of complaints regarding its activities, conduct or omissions for its Customers in compliance with Act LXXXVIII of 2014 on the Business of Insurance and other applicable legislation.

II. Definitions

Complaint

A complaint is a specific notification or claim related to a non-contractual performance, service or service-related activity pertaining to the Company's business activities, in which the Customer or a person acting on his/her behalf expresses criticism, comments or opinions regarding the Company's activities, conduct or omissions, or in which the Customer makes known to the Company his/her dissatisfaction and wishes with respect to finding a solution. Complaints may be made verbally (in person or by telephone) or in writing (by way of a document delivered in person or by another person, by post, by telefax, in an electronic letter).

The following shall not be deemed a complaint:

- a request made by the Customer to the Company for general information, opinion or position,
- any objection or comment in which the Customer objects to the Company's conduct not in relation to a specific service, but in relation to other activities related to the service or to the operation of the Company,
- any request for the amendment of data in relation to a change in the Customer's details,
- a request for the rectification of incorrectly recorded data, which does not affect the essential terms of the contract (premium, insurance cover),
- requests made by the Customer not on the grounds of performance by the Company but by an insurer contrary to the law or the contract.

Customer

A Customer is a corporate or unincorporated economic entity or organisation or a natural person for whom the Company, as an independent insurance intermediary, provides services falling within the scope of its commercial economic activity, or a person acting on behalf of the Customer for the purposes of this Policy.

If a complaint is submitted by a representative or a proxy, the Company shall verify the authorisation to submit a complaint, which shall be evidenced by presenting/making available documents and/or data that identify the person submitting the complaint or by a power of attorney.

If a protocol is taken of the complaint, the name of the natural person acting as the Customer's legal representative or proxy (e.g. company representative, natural person's proxy, etc.) submitting the complaint must be indicated next to the name of the complainant Customer.

III. Principles for handling complaints

ERIX Kft. strives to cooperate with the customer and to be flexible and helpful throughout the entire complaint handling process, including at the time of lodging the complaint, during the investigation of the complaint and after providing a response.

In handling complaints, ERIX Kft. shall act in accordance with the general framework of the requirements of good faith and fairness and of the requirements of conduct normally expected in the given situation, as set forth by law, with regard to the Customer's rights and obligations arising from the contract.

ERIX Kft. will handle complaints in such a way as to be able to prevent or identify and deal appropriately with any additional conflict of interest that may arise between the Customer and the Company, in order to avoid a prolonged and deepening dispute.

ERIX Kft. acts in accordance with the principle of transparency when handling complaints in order to ensure that the Customer receives the appropriate information in a timely manner in connection with his/her objections concerning the use of the service and can assert his/her legitimate claim and exhaust his/her legal remedies. To ensure that this principle prevails, the Company ensures increased transparency, openness and predictability both prior to and during the handling of complaints.

The Company will send the Customer its reasoned position on the written complaint within 30 days of the communication of the complaint, without undue delay.

The Company shall retain the complaint and the relevant response for at least 3 years and shall present it to the National Bank of Hungary (HNB) upon request.

The data of the person submitting the complaint shall be processed in accordance with the provisions of Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR) and Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information (Information Act).

IV. Scope of the Policy

The personal scope of this Policy comprises the employees of ERIX Kft, the legal entity and its employees acting under an agreement entered into with ERIX Kft. on the subject of intermediary activities, and the complainant or its representative.

With a view to implementing this Policy, the Company shall appoint a person responsible for handling complaints.

Person responsible for handling complaints: Tibor Kiss

V. Possible means of lodging a complaint

Verbal complaints may be made according to the following:

a. complaints made **in person**:

Venue of handling complaints:

ERIX Kft. Head office: 1096 Budapest, Vendel u. 11. 1st floor

Opening hours: 8.00 a.m. - 4.00 p.m. on weekdays

The Company will investigate a verbally made complaint as soon as possible and remedy it as necessary. If the Customer does not agree with the handling of the complaint, the Company will take a protocol on the complaint and its position on the complaint and provide a copy thereof to the Customer with respect to complaints lodged in person.

If the complaint cannot be investigated immediately, the Company will take a protocol on the complaint and provide a copy thereof to the Customer with respect to complaints lodged in person. Otherwise the Company acts in accordance with the provisions on written complaints.

a. complaints made **over the telephone**:

Telephone: +36 1 455 63 86

Period of receiving calls: 8.00 a.m. - 4.00 p.m. on weekdays

Telephone number: +36 20 389 25 00

Period of receiving calls: 8.00 a.m. - 4.00 p.m. on weekdays

In the case of complaints lodged over the telephone, the Company will ensure that calls are answered and dealt with within a reasonable waiting time.

If the Customer does not agree with the handling of the complaint or if it is not possible to investigate the complaint immediately, the Company will take a protocol on the complaint and its position on the complaint and send a copy thereof to the Customer in accordance with the provisions for complaints lodged in written form.

In the event of a complaint lodged over the telephone, the Company records the telephone communication between the Company and the Customer by means of an audio recording and retains the audio recording for a period of one year. The Customer will be informed of the recording at the beginning of the telephone call. Upon the Customer's request, the Company will ensure the replay of the voice recording and will provide, free of charge, a certified transcript of the voice recording (signed by the person responsible for handling the complaint).

c. **Written** complaints may be lodged in the following ways:

in person, by handing over a document at a place open to the public;

by post to the address of Erix Kft. (1096 Budapest, Vendel u. 11);

By **telefax** to the number +36 1 455 63 99.

In an **electronic** letter sent to erix@erix.hu.

Written complaints should be submitted using the complaint form attached to this Policy, or at least with corresponding content.

This Complaints Policy and the form for lodging complaints is available on the ERIX Kft. website (<https://www.erix.hu>).

When filing a complaint, the Customer may also act through his/her proxy, in accordance with the requirements set forth in Act V of 2013 (Civil Code).

During the investigation of the complaint, the Company will inform the Customer of the status of the investigation upon the Customer's request to that effect.

VI. Priority complaints

A complaint shall be deemed a priority complaint if the complainant is:

- An attorney,
- A parliamentary commissioner for citizens' rights,
- A consumer protection organisation or
- A supervisory authority of insurers.

Reason for the complaint:

- Lack of response to a previously submitted complaint,
- A repeat complaint, and
- The complainant complains that the insurer has discriminated against him/her in its activities or violated rules of ethics. Discrimination is understood as defined in Act CXXV of 2003 (on equal treatment and Promotion of equal opportunities).

VII. Procedure in the event of the rejection of a complaint

If the complaint is rejected, the Company will inform the Customer in its reply that he/she may, depending on the nature of the complaint, initiate proceedings before the HNB or the Financial Arbitration Board and will provide the Customer with the mailing address of the HNB and the Financial Arbitration Board competent at the Customer's place of residence or domicile.

VIII. Available remedies

If the complaint is rejected or if the statutory 30-day time limit for responding to the complaint has elapsed without any result, the Customer may apply to the following bodies or authorities:

With respect to a dispute relating to the conclusion, validity, effects and termination of the contract, or to a breach of contract and its effects, the Customer may initiate reconciliation proceedings or **bring an action** before a court.

Financial Arbitration Board

Address for correspondence: Financial Arbitration Board 1525 Budapest, Post Box 172.

Telephone: +36 80 203 776

E-mail: ugyfelszolgalat@mnbb.hu

More information is available on the website <https://www.mnbb.hu/bekeltetes> .

An application may be submitted to the National Bank of Hungary for conducting a consumer protection procedure in the event of an alleged breach of a consumer protection provision concerning the conduct, activity or omission of the service provider.

National Bank of Hungary

Address for correspondence: 1534 Budapest BKKP, Post Box 777.

Telephone: +36 80 203 776

Telefax: +36 1 489 9102

E-mail: ugyfelszolgalat@mnbb.hu

In person: 1122 Budapest, Krisztina krt. 6.

More information is available on the website <https://www.mnbb.hu/fogyasztovedelem> .

IX. Coming into Effect of the Policy

This Policy shall be effective as of 11 January 2022, At the same time, all previous policies, instructions adopted in this subject matter shall be repealed,

Budapest, 10 January 2022.

Tibor Kiss
Signed
Managing Director