

# LifeGoals.

## LifeGoals Financial Services Ltd

(Regulated by the Cyprus Securities & Exchange Commission, License Number 232/14)

### **Complaints Handling Policy**

## Contents

Complaints Handling Policy	1
1. Introduction	3
2. Procedures	3
3. Resolving Clients Complaints	3
4. Record-Keeping	5
5. PEPP Related Complaints	5

## 1. Introduction

Pursuant to the implementation of the Markets in Financial Instruments Directive (MiFID) and in accordance with the provision of the Directive for the Authorisation and Operating Conditions of Cyprus Investment Firms (DI144-2007-01), Emergo Wealth has established, implemented and maintains effective and transparent procedures for the professional, objective and prompt handling of complaints received from *Retail Clients* or potential *Retail Clients*, and to keep a record of each complaint and the measures taken for the complaint's resolution. Such procedures and records are the responsibility of the Administration/Back Office Department.

The Internal Auditor shall supervise the implementation of the Company policy and procedures with respect to Client Complaints.

## 2. Procedures

The following details have to be documented

- the identity of the Client who filed the complaint
- the identity of the employee that undertook to provide the service to the Client
- the department to which the relevant employee relates to
- the date of receipt of the complaint
- the details of the complaint – full description
- the extent in financial terms of the potential loss that the Client claims has suffered
- the date and in summary, the content of the reply of the Company to the said complaint

## 3. Resolving Clients Complaints

The Head of the Administration/Back Office Department shall be responsible for documenting all complaints received by the Company. Complaints can be received:

- By post to: 12 Demostheni Severi Street, 1090 Nicosia, Cyprus (Attention to: Complaints Handling Officer)
- By email to: [complaints@emergowealth.net](mailto:complaints@emergowealth.net)
- By telephone at: +357 22449122
- By fax at: +357 22780589

All complaints must be acknowledged in writing within 5 working days of being received. The written acknowledgement sent to the Complainant will include the details as to the name and capacity of the person dealing with the complaint. Depending on the significance of the complaint this acknowledgement may also include a proposed resolution.

Following the receipt of a complaint, by the Company, the Head of the Administration/Back Office Department shall make efforts to resolve the complaint within 5 working days. Following resolving the issue, the Head of the Administration/Back Office Department shall record the remedy measures or explanations granted, as applicable.

In the event that the issue has not been resolved within 5 working days, or if the remedy measure involves actions by other departments, then the Head of the Administration/Back Office Department shall communicate the Client's complaint to the Chief Operating Officer. A letter of acknowledgment should be sent to the Complainant, stating that the complaint is still under investigation and upon completion the Complainant will be informed of the outcome.

The Chief Operating Officer shall review carefully the details of the Client's complaint brought to him. Once the Chief Operating Officer understands fully the nature of the Client complaint, he may also communicate with the Client, to understand fully the nature and implications of the complaint, as applicable. At the same time, the Chief Operating Officer shall investigate and co-ordinate any relevant Heads of the Departments related to the Client complaint, until it is satisfactorily resolved.

In case the investigation is not concluded within four weeks following the submission of the complaint, the complainant will be informed in writing on the investigation's progress, the reason why the Company has been unable to resolve the complaint in the aforementioned time frame and an indication on when further contact will be made.

The Chief Operating Officer shall inform the Board, as well as the legal advisor of the Company of all Client complaints brought to him, at least annually.

In cases where Client complaints are in relation to the Administration/Back Office Department, the Compliance Officer of the Company shall have the responsibility and shall undertake the necessary efforts for resolving the complaint following the same procedures described above.

All decisions relating to Clients' complaints shall be communicated to Clients in writing (including electronic mail) and copies shall be retained by the Administration/Back Office Department. The decisions with respect to complaints in relation to Administration/Back Office Department shall also be retained by the Compliance Officer.

The report sent to the Complainant will explain clearly:

- The outcome of the investigation
- The nature and terms of any offer of settlement which the Company is prepared to make in satisfaction of the Complaint or
- The reasons for declining to offer a settlement

The report will also state that if the Complainant does not indicate dissatisfaction within one month of receiving the report, the Company will treat the complaint as settled.

The Company will also inform the Complainant that they may refer the complaint with a copy of the final response to the Cyprus Securities and Exchange Commission (CySEC) for further investigation. The Company will cooperate with CySEC in case it decides to carry out its own investigation in relation to a client's complaint.

#### 4. Record-Keeping

The Company shall maintain all complaints for a minimum period of **five** years. Responsible Department shall be the Administration/Back Office Department. Records are kept in physical and electronic form.

Further to the above, for Client complaints related to the Administration/Back Office Department, the Compliance Officer will also keep a copy of the relevant Client complaints, as applicable.

#### 5. PEPP Related Complaints

The clients may file a complaint via the platform at <https://www.lifegoals.eu/legal/en>. The following shall form the process for Complaint's handling:

The Personal Pensions & Investments Department shall monitor notifications for complaints.

An officer of the aforementioned department will be responsible for assessing the nature of the complaint and delegating it to the appropriate department. Depending on the nature of the complaint, the following departments shall be responsible for handling complaints (list is not exhaustive):

Nature of complaint	Department
Technical issue (i.e. access to account, failure to login, issues with the account)	Administration / Information Technology
Investments	Portfolio management
Account balance & related questions	Finance

Fees & charges	Sales
Any other legal issue	Compliance department

The respective officer shall inform the Compliance officer of the relevant complaint and action so that it can be recorded accordingly.

The Company shall make every possible effort to respond to client complaints either electronically or in another durable medium. The response shall address all points raised within an adequate timeframe and no later than 15 working days from the date of receipt of the complaint. In exceptional cases, where it is not possible to provide a response within 15 working days due to circumstances beyond the Company's control, a holding reply shall be sent, clearly indicating the reasons for the delay and specifying the deadline by which the client will receive the final response. In any event, the final response shall be provided no later than 35 working days from the date of receipt of the complaint.

Where the complaint cannot be resolved, the matter should be escalated to the Compliance officer. The Compliance officer may then escalate further to Senior Management if required.

A record shall be kept by the Compliance officer.

The Client may wish to file a Complaint to CySEC or may file a complaint for damages with the Financial Ombudsman.