

Complaints Handling Procedure

UKDE is committed to providing the highest quality of service. We recognize that occasionally the high expectations you rightly have of us will not be met. Therefore, we wish to make it as easy as possible for you to comment on our service and tell us when we get things wrong.

We treat every complaint as an expression of dissatisfaction with our service to which a complete response must be given. We will listen to your complaints, treat them seriously and learn from them, so that we can improve our service and not repeat them. We will resolve your complaint as quickly as possible.

This Procedure describes the procedure for the handling of complaints submitted by Policy Holders and other interested parties in line with the Law on Insurance and Reinsurance Business and Other Related Issues of 2016-2019 (the “Law”), as well as with the relevant Guidelines and Regulations issued by the Superintendent of Insurance of Cyprus and the Law Relating to the Establishment and Operation of a Single Agency for the out of Court Settlement of Disputes of Financial Nature by the Financial Ombudsman of 2010-2017.

What is a complaint?

The Cyprus Insurance Companies Control Service defines a complaint as:

A complaint or a statement of dissatisfaction addressed to an insurance undertaking by a Policy Holder relating to the insurance policy or the insurance services provided. Complaint handling must be differentiated both from the handling of claims and/or from simple requests relating to the execution of the contract, information or clarifications.

Who may make a complaint?

We accept service complaints from any person, whether a natural person or legal entity, who is presumed to be eligible to have a complaint considered by UKDE and has already filed a complaint, being a customer or other interested party, e.g. a policyholder, insured person, beneficiary, etc.

We will not accept service complaints from any other person, such as a person making a claim against a Policy Holder insured by UKDE.

What types of complaint will we accept?

A complaint is an expression of dissatisfaction, whether justified or not. We will accept complaints which are about the standard of service we provide, the behaviour of our directors or the Managers and any action or lack of action by us which affects an individual.

What types of complaint will we reject?

We will not accept complaints about activities other than those supervised by the Superintendent of Insurance of Cyprus and regulated in accordance with the Law, as amended or replaced from time to time or about matters which should be dealt with through the dispute resolution procedures set out in the Rules and Terms of Cover. Nor will we accept complaints about matters which have already been fully investigated pursuant to our complaints procedure, anonymous complaints and complaints about access to information where procedures are set out in legislation.

What standards do we apply to handling complaints?

We will:

- Treat all complaints seriously
- Treat complainants fairly and with courtesy at all times
- Treat all complaints in confidence and in accordance with the requirements of GDPR
- Deal with all complaints promptly
- Comply with the complaints procedure appended to this Policy
- Provide our Regulators with statistical information on complaints we receive

How do we record and report complaints?

UKDE will register internally all complaints received within three (3) business days of their receipt. The following details are recorded:

- Complainant
- Complaint details
- Date complaint was received
- Person responsible for managing the complaint
- Member of staff assigned to investigate the complaint
- The status of the complaint (open or closed)

An acknowledgement of receipt will be provided to the complainant within two (2) business days of receiving a complaint.

The response will be sent to the complainant within fifteen (15) business days of receiving a complaint. If this is not possible, the complainant will be notified accordingly.

The final reply will not exceed forty five (45) business days following the date of receipt of the complaint.

All communication with the Complainants will be in plain language which is clearly understood and the Complainant will be Kept informed about the progress of the handling of the complaint.

A record of all complaints received is kept on secure servers and/or paper files. Complaints will be stored in accordance with our Privacy Policy and in line with the requirements of data protection legislation and regulations. We will provide anonymized details of complaints and decisions in respect of them to our Board of Directors, and provide statistical information about complaints to our Regulators, together with any other information about complaints which they may lawfully require of us.

If a Complainant wishes to escalate its complaint, it shall be advised to submit its complaint to the Financial Ombudsman, with all relevant information/documentation and evidence of its complaint.

Their contact details are:

The Financial Ombudsman

Street Address: 13 Lordou Vironos Avenue, 1096 Nicosia, Cyprus

Postal address: PO Box 25735, 1311 Nicosia, Cyprus

Telephone: +357 22 848900

Email: complaints@financialombudsman.gov.cy

How may a complaint be filed?

Please contact UKDE at:

Address:

The United Kingdom Freight Demurrage and Defence Insurance (Europe) Limited

Compliance Department

Gemini House, Office No. 202

37 Theklas Lyssioti Street, 3311 Limassol, Cyprus

E-mail: david.smith@thomasmiller.com

