



Branch Office in Hungary

COMPLAINT MANAGEMENT RULES

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COMPLAINT MANAGEMENT RULES OF COLONNADE INSURANCE S.A. BRANCH OFFICE IN HUNGARY

A./ GENERAL PRINCIPLES FOR COMPLAINTS

- 1.) The Colonnade Insurance S.A. Branch Office in Hungary (hereinafter: the Branch) is obliged to object to the activities or omissions of its client prior to the conclusion of the contract with the Branch, the performance of the contract by the Branch and the termination of the contractual relationship. hereinafter referred to as "the complaint") to be fully investigated and answered.
- 2.) A complainant may be a natural person, a legal entity, or any other organization that uses a service of the Branch, or the recipient of information or an offer related to the service.
- 3.) A complaint shall be deemed to be and shall be treated as any written (personal or other document, post, fax, e-mail) or oral (personal, telephone) communication, which relating to the conduct, services, products, activities and omissions of any of its organizational units prior to the conclusion of the contract, in connection with the conclusion of the contract and the termination of the contract or arrives at any unit of the Branch due to the conduct of any employee of the Branch.

The customer may act by proxy. If the client acts through a power of attorney, the power of attorney must comply with the requirements set forth in the Civil Code (Act CXXX of 2016 on Civil Procedure) and the Civil Code (Act V of 2013 on the Civil Code).

- 4.) **A complaint is also considered to be a complaint if it is submitted in a matter other than that of the customer but also in a matter other than an insurance matter, except for documents received in an employment law case or in a lawsuit that has already been initiated.**
- 5.) It is the right and duty of the head of the acting unit to investigate the complaint due to the activity or omission, to take the substantive action and to inform the complainant. In the case of a complaint against conduct, this task and authority shall lie with the immediate superior.

If the complainant so wishes, he or she must be heard in person by the manager or, by his or her designation, by a subordinate capable of making a substantive decision.
- 6.) Complaints should be investigated promptly and with due diligence and appropriate action taken. In the event of a legitimate complaint, the measure complained of must be changed and the omission remedied as soon as possible and in the shortest possible time.

On the basis of a legitimate complaint against the conduct, measures shall be taken to ensure that the conduct complained of does not recur as far as possible and that

the person acting is held liable.

7.) In particular, the Branch Office may request the following information from the customer during the handling of complaints:

- name;
- contract ID;
- home address, registered office, mailing address;
- telephone number;
- method of notification;
- the insurance product or service affected by the complaint;
- description of the complaint, reason;
- the complainant's claim;
- a copy of the documents held by the customer in support of the complaint;
- a power of attorney valid in the case of a client acting through a proxy;
- other data necessary for the investigation and response of the complaint.

Should the Branch need additional information available to the customer to investigate the complaint, in particular to identify the customer in relation to the legal relationship affected by the complaint, it shall contact the customer immediately and obtain it.

8.) Possible ways to report a complaint are listed in Section E / of these policies, entitled "Handling Customer Complaints".

9.) The details of the customer submitting the complaint are provided by the Branch in accordance with Regulation 2016/679 of the European Parliament and of the Council and Regulation CXII of 2011 on the right to self-determination of information. in accordance with the provisions of

10.) Investigation of the complaint:

The Branch is obliged to ensure that the customers have the opportunity to pre-book the date of the personal administration in the room open to the oral complaint or, failing that, at the registered office. Within five working days from the date of requesting the date of personal administration, the Branch is obliged to provide the customer with a personal customer reception date.

- a.) An oral complaint, including a personal and telephone complaint, should be investigated immediately and, if possible, remedied. If the complainant does not agree with the handling of the oral complaint, the Customer Service Representative of the Branch shall immediately take minutes of the complaint and its position and provide a copy of the minutes to the complainant in the event of a personal oral complaint. Upon request, the Branch shall send the audio recording and minutes of the oral complaint communicated to the complainant to the complainant, otherwise it shall act in accordance with the rules applicable to the written complaint.

In the case of telephone complaints, the Branch shall ensure the reception and administration of calls within a reasonable waiting time.

The Branch is obliged to act as expected in the given situation in order to log in live within five minutes from the date of the successful recovery of the call to the Branch.

In the case of telephone complaints, the telephone communication between the Branch and the customer shall be recorded by the Branch and shall be kept for five years or until the end of the review proceedings against the decision made during the proceedings.

The customer must be informed of the recording of telephone communications at the beginning of the telephone administration. At the customer's request, the recording of the sound recording must be provided, and a certified record of the sound recording must be made available free of charge.

If it is not possible to investigate the complaint immediately, the Customer Service Representative of the Branch shall immediately take minutes of the complaint and provide a copy to the complainant in the case of a personal oral complaint. shall act in accordance with the rules.

The minutes of the oral complaint contain the following:

- - customer's name;
- - the customer's address, registered office and, if necessary, mailing address;
- - the name of the complainant, the place, time and method of submission;
- - a detailed description of the customer's complaint, recording separately the objections raised in the complaint, so that all the objections contained in the customer's complaint can be fully investigated;
- - the identifier of the contract concerned by the complaint;
- - list of documents, documents and other evidence presented by the client;
- - if it is not possible to investigate the complaint immediately, in the case of a complaint communicated in person, the signature of the person taking the minutes and the client;
- - place and time of recording the minutes.

If the customer's oral complaint is not submitted to the administrator appointed to handle the complaint, the Branch is obliged to inform the customer about the contact details of the organizational unit handling the complaint.

b.) The Branch provides for customers who qualify as consumers

–**National Bank of Hungary** (Supervisory) the form entitled “Consumer complaint to the service provider” published [here](#) on the website of the Magyar Nemzeti Bank. This form is also available [here](#) on the Branch website. You can also request the free sending of the referred forms from the Branch Office (telephone number: (36 1) 460-1400, (36 1) 801 0801; e-mail address: panasz@colonnade.hu; postal address: 1426 Budapest, Pf. 153.). The Branch is also obliged to accept written complaints submitted in other forms than the Supervisory Form.

The Branch shall be obliged to state its reasoned position on the written complaint in accordance with Article C./22 of these Regulations. reply in writing within the time limits specified in

If the request or complaint is received from an e-mail address (email address) previously announced and registered for the purpose of contact, the Branch will send a reply to it electronically. The Branch receives complaints received electronically on an ongoing basis.

If the customer does not send the written complaint to the address of the complaint handling department specified in these regulations, or if the written complaint is not handed over by the Branch to a complaint handling agent in a room open to customer traffic, the Branch shall forward the complaint immediately upon receipt. for your complaint handling unit.

In the event of a written complaint submitted in person in a room open to customer traffic, the Branch shall inform the customer of the contact details of the organizational unit handling the complaint.

- 11.) In the handling of complaints, efforts should be made to ensure that the competent unit investigates and closes the complaints received.
- 12.) At each branch of the Branch, it must be ensured that the complainants are dealt with by a well-trained, knowledgeable, courteous employee who is able to negotiate. It must be ensured that the complainant receives professional and comprehensible information at the same time as the personal interview. Simple language should be used when providing information and unjustified use of legal terms should be avoided.
- 13.) Following the investigation of the complaint, the Branch shall provide a response detailing the outcome of the full investigation of the complaint, the action taken to settle or resolve the complaint and, if necessary, the reason for the rejection. the exact text of the contract terms and conditions or the articles of association.
- 14.) **The Branch shall provide information on the results of the investigation of the complaint with precise, comprehensible and unambiguous reasons, which - depending on the subject of the complaint - shall include the Branch's resolution, the reasons for the assessment, the exact text of the relevant terms and conditions and references to the customer.**
- 15.) In its response, the Branch shall inform the complainant in writing that in the event of the rejection of the complaint or not answered, the consumer may submit the complaint to the Complaint Manager of the head office of Colonnade Insurance S.A. Branch Office in Hungary (The head office of Colonnade Insurance S.A. Branch Office in Hungary is Colonnade Insurance S.A., registered office: L-2350 Luxembourg, Rue Jean Piret 1. Hereinafter referred as Head Office.) via complaints@colonnade-insurance.com e-mail address.
- 16.) If the consumer submitted his complaint to the Complaint Manager of Head Office however he received an unsatisfactory response or he did not receive a response within 90 days from the date of submission, he can turn to supervisory body of the Head Office as well as Colonnade Insurance S.A. Branch Office in Hungary, Commissariat aux Assurances (hereinafter: CAA) within 1 year from the date of submission of the complaint to Complaint Manager. Details of this can be found

in annex 1.

- 17.) Furthermore, the Branch **shall inform the complainant in its written response that in the event of the rejection of the complaint or the failure to comply with the 30-day legal response period, the consumer customer may submit the complaint to any of the following organizations:**
- a.) **in the event of a dispute related to the conclusion, validity, legal effects and termination of the contract, as well as the breach of contract and its legal effects, the Financial Arbitration Board** (registered office: 1013 Budapest, Krisztina krt. 55.; customer service: 1122 Budapest, Krisztina krt. 6.; mailing address: 1525 Budapest BKKP Pf.: 172, telephone number: + 36-80-203-776, e-mail: ugyfelszolgalat@mnf.hu);
 - b.) **the customer in case of violation of the consumer protection provisions at the Financial Consumer Protection Center of the Magyar Nemzeti Bank** (mailing address: Magyar Nemzeti Bank, 1534 Budapest BKKP Pf.: 777., telephone number: + 36-80-203-776; e-mail: ugyfelszolgalat@mnf.hu) may initiate consumer protection proceedings, or
 - c.) he/she may apply to a court in accordance with the rules of civil procedure.

The branch made a general declaration of submission to the Financial Arbitration Board in cases up to HUF 500,000. The Conciliation Board of the Financial Arbitration Board may, in the absence of an agreement, make a decision containing an obligation even if the Branch has not made a declaration of subjection, but the claim is justified and the consumer's claim the one million forints.

The Branch informs the customer who does not qualify as a consumer that he may appeal to the Court against a decision that is not suitable for him/her.

The Branch is obliged to send the reply to the customer in a way that is suitable to prove to whom the service provider sent the consignment, and also to confirm the fact and date of sending the consignment without any doubt.

B./ COMPLAINTS FORUM SYSTEM AND BODIES

- 18.) Complaints should be grouped according to whether they were brought against conduct or action or omission.

Complaints against conduct should be dealt with as follows:

A complaint filed against the conduct of an employee of any branch employed in any organizational unit must be considered and settled by the head of that unit in all cases, unless it is directed against the head, because then the immediate superior is obliged to take action.

- 19.) The types of complaints against an activity or omission are as follows:

For the purposes of uniform interpretation, in the field of insurance, in particular, the

conclusion or termination of insurance contracts, the payment of premiums and the fulfillment of contractual obligations by the customer or any other person concerned complaints against the resolution or certificate, notification.

Complaints of default, usually those related to the services of the insurance contract or failure to notify.

20.) A request in which the customer requests information or conditions on the terms and conditions of an insurance policy or other matters concerning insurance shall not be considered a complaint. Such questions should be answered according to the requirements of the customer service work, subject to business confidentiality and privacy.

21.) Complaints received by the Branch shall be investigated and resolved in a forum system.

These forums are the followings:

- Claims department
 - Consumer claims handling group (except claims relating to travel insurance),
 - Travel insurance relating claims handling group,
 - Commercial claims handling group.
- Administration department.

22.) The clerks of the organizational units listed in point 21) of these regulations are responsible for investigating and responding to reported complaints.

If the department has previously received a remark or complaint in the given case, it must be sent to the head of the given department together with the history without delay. The proposal of the head of department shall be included in the file if it is not clear from the previous reply letter or, on the basis of a repeated complaint, a change in his previous position in the possession of new information.

23.) The organizational units listed in point 21) of these regulations handle complaints filed against the departments and organizational units operating under their control.

C./ COMPLAINTS HANDLING PROCEDURE

24.) The Company is obliged to handle the complaints received by the Branch during the periods detailed below:

a.) In the proceedings initiated by the MNB in connection with consumer complaints pursuant to Section 81 of the MNB Act, the Branch is obliged to send a written response to the Supervision within the time limit specified in the MNB's request.

b.) In the case of complaints received directly by the Branch, the complaints are subject to the provisions of Act LXXXVIII of 2014 on Insurance Activities. According to Section 159 (8) of the Act (Bit.), it must be dealt with as soon as possible, but no later than within 30 days from the notification (receipt, notification) of the

complaint.

- 25.) If the letter of complaint is not received directly from the complainant, but through another body (MABISZ, MNB, television, radio, press, etc.) and the transmitting body requests information on the settlement, the information shall be provided by the head of the case.

If the original complaint letter is reclaimed by the transferor after administration, this must be complied with. However, care must be taken to ensure that a certified copy of the original complaint letter remains in the file.

- 26.) If a complaint is received by any unit of the Branch that the Company is not competent to resolve, it shall be forwarded directly to the organization competent for settlement within 3 days, with the simultaneous notification of the erroneous sender.
- 27.) In cases where the legal interpretation of the Terms is disputed, you are required to seek the opinion of the Legal Department.
- 28.) In case of complaints from an individual lawyer, a bar association or other legal representative, inquiries received by the Branch will be answered after consultation with the Legal Department.

D./ REGISTRATION, ADMINISTRATION, CORRESPONDENCE, REPORTS, MEASURES

- 29.) A separate register must be kept of the complaints received.

Complaints must be entered in the register in chronological order, and the number of the main case must be recorded, if it appears from the documents. The serial number must also be entered on the file and this serial number must be referred to in the document in the case.

When the investigation of the case has been completed and the necessary measures have been taken, the date of the final closure of the case and whether the complaint was lawful or unfounded shall be entered in the appropriate box in the register.

- 30.) The register contains:
- a) the date of submission of the complaint, the method of submission of the complaint, the method and date of confirmation of the complaint;
 - b) complaint ID;
 - c) the name of the person who submitted the complaint;
 - d) the name of the company in connection with the operation of which the complaint was submitted;
 - e) the complaint handling forum to which the complaint was submitted, and the line of business;
 - f) type of complaint;
 - g) the name of the complainant, the contact details of the complainant and the type of relationship between the complainant and Colonnade Insurance S.A. Branch Office in Hungary;

- h) the name of the administrator;
- i) the line of business;
- j) the insurance product;
- k) the claim number and amount of claim;
- l) the description of the complaint and the subject of the complaint (the reason of the complaint or the type of danger such as burglary, pipe rupture, amount, etc.);
- m) qualification of the complaint;
- n) a description of the measure intended to settle or resolve the complaint and if the complaint was rejected, the reason of rejection, the date of the decision of the before-mentioned measures, the amount which was paid based on the measure;
- o) the reason if the complainant rejects the decision of Colonnade Insurance S.A. Branch Office in Hungary;
- p) the interim measure (e.g. on-site inspection, issued for inspection, contacting a body, etc.), the date of interim measure;
- q) the deadline of the interim measure and the responsible person of execution of the interim measure;
- r) reminder columns before the expiration of the legal deadline for settling the complaint (15 days after the receipt of the complaint, 25 days after the receipt of the complaint);
- s) the date of the response to the complaint, and the period for settling the complaint (expressed in days)
- t) if the complaint was forwarded to Complaint Manager of the Head Office of Colonnade Insurance S.A. Branch Office in Hungary, then the fact of this, the date when it was forwarded to him, the effect of the forwarding on the current process, the information related to the complaint forwarded to the Complaint Manager of Head Office of Colonnade Insurance S.A. Branch Office in Hungary (proposed decision, etc.), the decision of the Complaint Manager of Head Office of Colonnade Insurance S.A. Branch Office in Hungary and the date of his decision;
- u) the final decision on the complaint, the responsible person sends the final decision to the complainant and the mode of sending of the final decision;
- v) if the complaint was submitted to CAA or other local organizations, then this fact, the date of submission, the decision and the date of the decision of the before-mentioned organizations.

31.) The Branch shall keep the complaint and the answer to it for 5 years and present it at the request of the MNB.

32.) Any submission in which the notifier reports a circumstance, error, etc. is considered to be a public interest complaint. draw attention to or suggest a solution that is in the best interests of a larger community or society.

The public interest notification, if it contains a specific complaint, shall be handled in the manner prescribed in the complaint procedure, but at the same time it shall be recorded in a separate register. The public interest notice shall in all cases be sent to the Director of the Center, who shall be responsible for deciding the matter. If it is not possible to decide which director may take action, the matter shall be referred to the head of the branch. Substantive and general action will be the

responsibility of the addressee.

E./ CUSTOMER COMPLAINTS

- 33.) In person: at the Customer Service of Colonnade Insurance S.A. Branch Office in Hungary
1134 Budapest, Váci street 23-27. H₂O Office, 7th floor.

Opening hours of the Customer Service Office of Colonnade Insurance S.A. Branch Office in Hungary:

Monday - Thursday from 8.30 a.m. to 5 p.m.
Friday: from 8 a.m. to 3 p.m.

- 34.) **On phone: (36 1) 460-1400, (36 1) 801 0801**

Monday: from 8.30 a.m. to 8 p.m.
Tuesday – Thursday: from 8.30 a.m. to 5 p.m.
Friday: from 8.30 a.m. to 3 p.m.

By fax: (36 1) 460-1499

- 35.) In written: in e-mail: panasz@colonnade.hu
 via internet: www.colonnade.hu
 in mail: 1426 Budapest, Pf. 153.

- 36.) **Complaint forums:**

If the complaint is rejected or not answered, you can turn to **Complaint Manager** of the head office of Colonnade Insurance S.A. Branch Office in Hungary (The head office of Colonnade Insurance S.A. Branch Office in Hungary is Colonnade Insurance S.A., registered office: L-2350 Luxembourg, Rue Jean Piret 1. Hereinafter referred as Head Office.) via complaints@colonnade-insurance.com e-mail address.

If the consumer submitted his complaint to the Complaint Manager of Head Office however he received an unsatisfactory response or he did not receive a response within 90 days from the date of submission, he can turn to supervisory body of the Head Office as well as Colonnade Insurance S.A. Branch Office in Hungary, **Commissariat aux Assurances** (hereinafter: CAA) within 1 year from the date of submission of the complaint to Complaint Manager. A request for CAA's out-of-court dispute resolution must be submitted **in writing** in Luxembourgish, German, French or English, by post to the CAA address (7, Boulevard Joseph II, L-1840 Luxembourg), by fax (22 69 10), by e-mail (reclamation@caa.lu), online on the CAA website (FR, EN, DE form) by completing the alternative dispute resolution request form.

In the event of a rejection of a complaint or an unsuccessful 30-day legal response period to investigate a complaint, a complainant who qualifies as a consumer may submit a complaint to any of the following local organizations:

Financial Arbitration Board

In the event of a (financial consumer) dispute related to the conclusion and performance of the insurance contract, the Financial Conciliation Board (registered office: 1013 Budapest, Krisztina krt. 55.; customer service: 1122 Budapest, Krisztina krt. 6., mailing address: 1525 Budapest BKKP) Pf.: 172; phone: + 36-80-203-776; e-mail: ugyfelszolgalat@mnbb.hu).

National Bank of Hungary

The competent supervisory authority is the Magyar Nemzeti Bank. In case of violation of consumer protection regulations, a natural person (consumer) acting for purposes other than his / her independent occupation and economic activity at the Magyar Nemzeti Bank (letter address: Magyar Nemzeti Bank, 1534 Budapest BKKP Pf.: 777.; tel.: + 36-80-203- 776; e-mail: info@mnbb.hu) may initiate consumer protection proceedings.

Litigation

In the event of a dispute concerning the conclusion and performance of the insurance contract, the consumer may also take legal action in support of his/her position.

In the event of the rejection of the complaint or the failure to comply with the 30-day statutory deadline for replying to the complaint, a customer who does not qualify as a consumer may appeal to the Court against a decision that is not suitable for him/her.

This policy shall enter into force on 31 March 2023 and shall remain in force until revoked.

In Budapest, on 31 March 2023

Csaba Kéringer dr.
General Manager

Appendix 1 - The Alternative Dispute Resolution offered by CAA

The Alternative Dispute Resolution service offered by the Commissariat aux Assurances (CAA) is a service which aims to find an amicable solution to a complaint against a professional subject to the supervision of the CAA free of charge.

Who can refer a case to the CAA?

Any **natural persons** acting for purposes outside their commercial, industrial or liberal activity and concerning insurance contracts concluded or negotiated by the natural or legal persons subject to its supervision.

Before approaching the CAA

The Complaint must have been **previously** submitted **in writing to Colonnade** and the Complainant has not received a reply or a satisfactory reply within **90 days** of the Complaint being sent.

Is the application admissible?

An application is not admissible in the following cases:

- when the Complaint has already been the subject of a court decision or arbitration award, in Luxembourg or abroad;
- when a Luxembourg or foreign court or arbitrator is seized of the Complaint;
- when the Complaint is referred to another out-of-court complaint settlement body than the CAA, in Luxembourg or abroad;
- where the Complaint has not been lodged within one year of the date on which the Complainant lodged a Complaint with Colonnade;
- where the Complaint concerns Colonnade's commercial policy;
- when the Complaint concerns a product or service other than insurance;
- when the request is abusive, unreasonable or vexatious;
- where the Complaint does not originate from a policyholder, a beneficiary of an insurance contract, an insured person (of Colonnade) or an injured third party in a direct action against Colonnade;
- where the Complaint lodged with Colonnade and the application lodged with the CAA differ in their subject matter and/or grounds.

How to refer to the CAA?

The request for out-of-court settlement must be submitted in Luxembourg, German, French or English **in written form**, either

- by post to the address of the CAA (7, boulevard Joseph II, L-1840 Luxembourg),
- by fax to the CAA (22 69 10),
- by e-mail (reclamation@caa.lu),
- online on the CAA website (form [FR](#), [EN](#), [DE](#)) by filling the request for alternative dispute resolution form

The CAA's conclusions

The CAA's reasoned opinion is **not binding** on the parties, who are free, after a reasonable period of reflection, to accept or refuse to follow it. If the parties do not reach an agreement following the issuance of the CAA's reasoned conclusion, they have the possibility to refer the matter to the courts.