



Klips

Klips CY Ltd – Complaints Handling Procedure

1. INTRODUCTION

- 1.1 KLIPS CY Ltd (the “Company”, “Klips CY”, “we” and “our”) a limited liability Company incorporated in the Republic of Cyprus with registration number HE431041. Klips CY is authorized and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) as a Cyprus Investment Firm (“CIF”) with license number 434/23 and having its registered address at 116 Gladstonos Street, M.Kyprianou House 3rd & 4th floor, 3032, Limassol, Cyprus.
- 1.2 We aim to provide a high level of service to all clients, at all times. Therefore, we value feedback from our clients and use it to enhance the quality of our products and services. We appreciate that from time to time there can be misunderstandings and we endeavor to deal with your queries and complaints sympathetically and in timely manner.
- 1.3 As part of our commitment to provide our clients the best service, we uphold effective and transparent procedures for the prompt handling of client Complaints, and we maintain records of complaints and measures taken for complaint resolution, in line with the applicable Rules, and/or Regulations and we are pleased to operate in accordance with the complaint management procedures of the Cyprus Securities and Exchange Commission (“CySEC”).

2. TYPES OF COMPLAINT HANDLED

- 2.1 In line with the foregoing, we will investigate any written expression of dissatisfaction you have against our Company relating to the investment and/or ancillary services provided by our Company, in accordance with the Complaint Handling Procedures set forth herein. The aforesaid reasons for dissatisfaction may include, but not be limited to, the following:
 - a) a perceived injustice because of an alleged maladministration on our part, pertaining to:
 - i. your Account(s) with us and/or the Transactions and/or Contracts carried out and/or reflected therein;
 - ii. your rights under the ‘Client Agreement/Terms and Conditions’, our ‘Client Categorization Policy’, our ‘Order Execution Policy’, our ‘Conflicts of Interest Policy’, our ‘Money Laundering Prevention Policy’ and the ‘Investor Compensation Fund Scheme’, as set forth in the ‘About Us’ section on our Online Trading Facility.
 - b) a denial of a request for information regarding your Account and/or the Transactions and/or Contracts carried out and/or reflected therein; and/or
 - c) dissatisfaction with the way in which we respond to an enquiry and/or the time that we have taken to respond.

3. PROCEDURE REQUIREMENTS

- 3.1 The Company shall maintain effective and transparent procedures for the prompt handling of complaints or grievances received from Clients. The Company shall keep a record of each complaint or grievance as well as the measures taken for the complaint’s/grievance’s resolution. The Company will issue a unique reference number upon review of the submitted form. The Client should use this unique reference number in all future contact with the Company, the Financial Ombudsman and/or CySEC.
- 3.2 If the complaint or dispute cannot be resolved internally by us in accordance with our Complaint Handling Procedures set out herein, you may refer the matter to the Approved Dispute Resolution (ADR) scheme set forth in Sections 10 and 11 hereinafter, if you so wish. If you wish to refer your complaint to the ‘**Financial Ombudsman**’ or an **ADR**, please see below the relevant contact details:

Financial Ombudsman of the Republic of Cyprus
Address: 13 Lord Byron Avenue, 1096 Nicosia,
Cyprus Phone: 22848900
Facsimile (Fax): 22660584, 22660118

E-mail: complaints@financialombudsman.gov.cy
Complaints:
Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy
Website: www.financialombudsman.gov.cy

Competition and Consumer Protection Service

Address: 6 Andrea Araouzou, Nicosia, 1421, Cyprus
Phone: 00357 22867153
E-mail: ccps@mcit.gov.cy
Website: <http://www.mcit.gov.cy/ccps>

More information on ADRs and Online Dispute Resolution of complaints (“ODR”) can be found at: <http://ec.europa.eu/odf>.

4. SUBMITTING A COMPLAINT

- 4.1 Any query and/or issue and/or problem you may face in respect of the services provided by Klips CY LT following the Client Agreement should be made in writing and addressed to our Company’s Customer Support Department via the “Contact Us” page of our Website.
- 4.2 If you wish to submit an official Complaint for your account and/or your dealings with the Company, please complete the Complaint Form, which is accessible to clients below as **Appendix A** and submit it to the following email address: complaints@klips.com, along with any relevant evidence.
- 4.3 Complaints made by clients or potential clients cannot be considered unless the Complaint Form is duly completed with all the required information and it is accompanied by adequate supporting evidence (as necessary) for the complainant’s claims.
- 4.4 Upon receipt of a duly completed Complaint Form we gather and investigate all relevant evidence and information regarding the complaint. The following information and documentation should, wherever possible, be obtained and recorded and provided to the Compliance Officer as part of your formal complaint, in order to ensure that the complaint is expedited in the most efficient and fair manner: (a) Account Number; (b) Date the problem first occurred; (c) Short summary of the complaint; (d) Disputed amount and currency; (e) Attach any documentation or other material that may assist in the resolution of the complaint.

5. HANDLING A COMPLAINT

- 5.1 The Company’s policy is to acknowledge to the Client receiving of the complaint within 5 working days and try to resolve the complaint/ grievance within this timeframe. Within two (2) months from the date of receipt of the complaint, a final response will be disseminated to the Client analyzing the findings of the investigation.
- 5.2 You should use the said unique reference number in all contact with the Company as well as with the Financial Ombudsman, the ADR and/or CySEC, where applicable.
- 5.3 In the event that the Company is unable to respond within the two (2) months period, it will inform the complainant of the reasons for the delay and indicates an estimated period to complete the investigation, which will be no longer than three (3) months from the submission of the complaint. Details of the full procedure regarding the complaints can be found in the Company’s website and specifically to the complaint handling form.
- 5.4 Once a Complaint’s investigation has been completed, a Final Response shall be issued to the complainant. Further clarifications on the Final Response may be provided following the complainant’s subsequent communication with the Company. If the Company is unable to resolve a Complaint within two (2) months, the Company shall update the complainant on the status of his/her Complaint and shall continue to do so until such time as the investigation is complete. According to applicable regulatory obligations, the Company has an additional month to resolve a

Complaint, if it is unable to resolve a Complaint within two (2) months (i.e. a Final Response should be issued within maximum three (3) months from the day of the Complaint).

6. MONITORING AND REPORTING OF COMPLAINTS

- 6.1 We are required by CySEC to keep detailed records on individual complaints thus, we maintain an internal register of complaints where all relevant information and progress of each complaint is kept.
- 6.2 The Company is required on a monthly basis to submit information regarding the complaints we receive from our clients to CySEC.
- 6.3 In addition, we are required to report to the Senior Management, on at least an annual basis, the complaints handling reporting to CySEC, as well as on the actions undertaken or actions that will be undertaken in relation to any deficiencies and/or weaknesses that may be identified.
- 6.4 The Company does not share any private information with any third parties and we comply with Regulation (EU) 2016/679 of the European Parliament and of the council of 27 April 2016 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 (“General Data Protection Regulation”, “GDPR” or the “Personal Data Protection Legislation”), as the same may be in force from time to time and replaced or amended from time to time.

7. APPENDIX A

Way of Communication:	FAX <input type="checkbox"/>	Electronically <input type="checkbox"/>	Telephone <input type="checkbox"/>	Letter <input type="checkbox"/>
Client details				
Name:		Surname:		
Legal Entity Name:				
Account Number:				
Address:				
Post Code:		City:		County:
Telephone Numbers:	Home:	Work:	Mobile:	Fax:
Email:				
Brief Summary of the complaint Description of product or service and/or department and/or employee you are complaining about (description, evidence, magnitude of damage and suggested way to be solved):				
Please enclose any other relevant documentation that may help us to handle the complaint.				
Signature:			Date:	