

INTRODUCTION

This Policy is designed to provide guidance on the manner in which ECCM Bank plc (the Bank) receives, investigates and resolves complaints, related to its products and services.

PURPOSE OF THE COMPLAINTS HANDLING POLICY

The Bank aims at providing high standards of service to customers while also protecting their interest. At the forefront of its corporate values, the Bank is committed to encourage customers to provide constructive feedback in order to enable the Bank to improve its services.

Any feedback received serves as a means of monitoring and improving service delivery to customers, as well as enhancing organisational effectiveness and efficiency. Hence the Bank encourages its customers to come forward with any matter, when they feel that their expectations were not met.

WHAT IS A COMPLAINT?

A ‘complaint’ can be defined as a verbal or written statement of dissatisfaction received by the Bank from any of its customers, about any aspect of the Bank’s products and services provided.

WHO MAY COMPLAIN?

Any customer of the Bank or their representative/s, who may be dissatisfied with the Bank’s products or services, for any reason, may submit a complaint (hereinafter referred to as the “Complainant”).

COST

There is no charge to the complainant for submitting a complaint.

HOW TO COMPLAIN

A complaint may be made in English and is to be addressed to the Chief Executive Officer (CEO).

Complaints may be submitted by either of the following procedures:

- a) a formal telephone call to one of the executive secretaries within the CEO Office; or
- b) an email is sent to info@eccm.com.mt; or
- c) a formal letter is addressed to the CEO and sent to the registered office of the Bank, that is:

**ECCM Bank plc
“The Adelaide”
230/231, Tower Road,
Sliema, SLM 1601
Malta**

WHAT INFORMATION SHOULD BE INCLUDED WHEN FILING A COMPLAINT?

When filing a complaint, a customer is requested to briefly set out all the facts regarding the issue and provide the following information:

- Name, I.D. Card number or Passport number, and contact details of the person filing the complaint;
- The name of the Company in whose name the complaint is being made;
- Name of the Bank employee who received the complaint;
- Copies of any documentation supporting the complaint.

Information and personal data provided in lodging a complaint, shall be treated in accordance with the Data Protection Act (Chapter 586 of the Laws of Malta) and other applicable legislation.

The Bank reserves the right to provide information on complaints and complaints-handling to the Malta Financial Services Authority (MFSA) and, to an alternative dispute resolution entity in the case that a dispute remains unresolved.

DATA PROTECTION

The Bank will ensure that when handling complaints, it shall abide with any data protection laws, including the Data Protection Act (Chapter 586 of the Laws of Malta) and any regulations issued thereunder, including the 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.

ACKNOWLEDGMENT OF COMPLAINTS

Once a complaint is received in line with Section 4 above, the Bank commits itself to acknowledge receipt in writing of the complaint within 2 working days.

Such written acknowledgement should include confirmation to the complainant that:

- a) the Bank will investigate the complaint;
- b) the Bank will, on completion of the investigation and without unnecessary delay, inform the complainant, in writing, about the outcome of the investigation and describing its proposed course of action; and
- c) if the investigation is not completed within 15 working days from the date of receipt of the complaint, the Bank shall inform the complainant of such fact before the end of this period.

RESPONSE TO A COMPLAINT

In normal circumstances, the Bank should be in a position to process the complaint and respond within 15 business days from receipt of the complaint.

If the Bank is not in a position to reply within this timeframe, the Bank shall immediately inform to the complainant:

- a) the reasons of the causes of the delay;
- b) an indication as to when a final reply will be received, in any case by not later than 35 days from date of receipt of the complaint; and
- c) inform the complainant that, if it is not satisfied with the progress of the investigation, it has a right to refer to other Alternative Dispute Resolution fora, including referring the matter to the Office of the Arbiter for Financial Services.

RIGHTS OF A COMPLAINANT DURING THE COMPLAINT PROCESS

The complainant has the right to:

- a) enquire as to the status of their complaint;
- b) withdraw the complaint by a notification in writing to the Bank's CEO, highlighting the reason for the withdrawal.

RIGHTS OF A COMPLAINANT AFTER THE COMPLAINT PROCESS

Should the complainant remain unsatisfied with the Bank's final reply, or no agreement was reached between the parties, one may refer the matter to the Office of the Arbiter for Financial Services, 1st Floor, St Calcedonius Square, Floriana, FLN 1530, Malta. Telephone: +356 21249245.

Email - complaint.info@financialarbiter.org.mt

Further information may be obtained through the official website:

www.financialarbiter.org.mt



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