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## *Complaints Handling Policy*

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***Risk Warning: CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. 95% of retail investor accounts lose money when trading CFDs with this provider. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money.***

### Contents

1. Introduction .....	<b>Error! Bookmark not defined.</b>
2. Scope of the Complaints Handling ProcedureClient Categorization - Criteria	<b>Error! Bookmark not defined.</b>
3. Definition of a Complaint .....	3
4. Procedure.....	3
5. Records and Reporting .....	5
6. Review of the Policy .....	6
7. FAQs .....	6
8. Relevant contacts.....	6
9. Client’s dissatisfaction.....	6

### Introduction

K-DNA Financial Services Ltd (hereinafter referred to as “K-DNA” or the “Company”), is a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 273/15, offers a variety of investment products to Retail, Professional and Eligible Counterparties (the “Clients”). The Company is located at 56 Griva Digeni street, Anna Tower, Floor 1, 3063 Limassol, Cyprus.

### Scope of the Complaints Handling Procedure

The Complaints Handling Procedure (‘the Procedure’) describes a fair and quick process of dealing and handling client’s complaints that may arise from our relationship with clients.

### Definition of a Complaint

A complaint is an expression of dissatisfaction by a client regarding the provision of investment and/or ancillary services provided by K-DNA Financial Services Ltd (‘the Company’).

The Company considers important and essential to pay the proper attention to each and every complaint made by a client, irrelevant of the subject matter of the complaint.

### Procedure

The Company shall establish a complaints management function responsible for the investigation of complaints.

All complaints must be in writing and firstly addressed to the Customer Support Department ([support@finmarket.com](mailto:support@finmarket.com)). The Customer Support Department shall resolve the complaint based on the procedure mentioned in the below paragraphs. In cases that it deems necessary, the Customer Support can transfer the complaint to the Compliance Department.

#### A complaint must be written in English and include the following information:

- The client's full name
- The client's trading account number
- The Client’s address and email address
- The affected transaction(s) number (if applicable)
- Date and time that the issue causing the complaint arose
- A full and clear description of the issue causing the complaint/content of the complaint
- Reference to any correspondence exchanged between the Company and the client (such correspondence should be attached).

The Company may at its discretion to refuse to handle a complaint if any of the requirements contained in the above subparagraph is not fulfilled.

Once a complaint is received by the Customer Support Department, and fulfils the above requirements, the following shall apply:

- (i) A written acknowledgment from the Customer Support Department shall be sent to the client within five (5) days confirming receipt of the complaint and the estimated time under which the client shall be given a reply, and providing a unique reference number to the client for the specific complaint in accordance with Circular C100; the Compliance Department shall inform the client that he/ she should use the said reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint;
- (ii) The Customer Support Department shall register the complaint directly to the Company's internal register, as soon as possible and in an appropriate manner;
- (iii) Within four (4) weeks of receipt, the Company shall send the client a Final Response or a holding response, which will explain why it is not yet in a position to resolve the complaint and give an indication of when further contact shall be made. In such case an answer shall be given within eight (8) weeks of receipt;
- (iv) Within eight (8) weeks of receipt of the complaint, the Company shall send to the client either a final response or a response which explains why a final response cannot be given with an explanation as to why and an indication of when the Company anticipates on providing a final response;
- (v) Upon sending the final response, the client shall be given a period of eight (8) weeks to respond. If a response is not received within eight (8) weeks, then the Company shall not be obliged to take the complaint further unless further correspondence is received from the client indicating that he/she is still dissatisfied;
- (vi) Please note that the Company shall consider a complaint as closed when a period of three (3) months has elapsed from the date of submission of the complaint and the client has failed to respond to the Company's investigating officer's requests and due to this the investigation cannot be carried forward.

When the client receives a response from the Customer Support Department but considers that the complaint needs to be raised further, the client may ask the Customer Support Department to provide him with the Client Complaint Form that should be filled in and submitted by the client to the Compliance Department ([compliance@finmarket.com](mailto:compliance@finmarket.com)) which will independently and impartially investigate the complaint.

The Compliance Department shall thoroughly examine complaints taking into account all available relevant information including but not limited to the information contained in the books and records of the Company and the client's trading account journal and reach a fair and reasonable outcome.

*The Compliance Department shall:*

- (1) Send a final response to the client as soon as the examination of the complaint is concluded and no later than within 2 months from the date that the complaint form was received.
- (2) In cases that further investigation is required and therefore the Company is unable to respond to the complaint within the timeframe of two (2) months since the receipt of the complaint, the Company shall inform the client of the reasons for the postponement and the expected timeframe to complete the investigation and respond. This period of time shall not exceed three (3) months from the submission of the complaint.

Upon sending the initial response by Compliance department, the client shall be given a period of eight (8) weeks to respond. If a response is not received within eight (8) weeks, then the Company shall not be obligated to take the complaint further unless further correspondence is received from the client indicating that he/ she is still dissatisfied.

Please note that the Company shall consider a complaint as closed when a period of three (3) months has elapsed from the date of submission of the complaint and the client has failed to respond to the Company's investigation officer's requests and due to this the investigation cannot be carried forward.

Clients or potential clients can submit complaints to the Company free of charge. When handling a complaint, communication with clients or potential clients shall be clear, in plain language that is easy to understand.

All complaints will be treated with confidentiality.

### **Records and Reporting**

The Company shall keep and continuously update records of all the complaints received by clients with details of the investigation conducted, the final outcome of these, any measures taken for their resolution and all the communication with the clients.

Furthermore, the Company shall report on a monthly basis to CySEC information regarding Client complaints filed to the Company and how these are being handled, as per the requirements of Circulars C100 and C198.

### Review of the Policy

This policy shall be regularly reviewed and updated by the Compliance Function in line with applicable legislation updates and when considered necessary and each updated version shall be approved by the Company's Board of Directors.

The Company will inform its Clients of any material changes to this procedure by posting the updated version of the policy on its Website.

### FAQs

Questions regarding this Procedure should be addressed, at first instance, to the Customer Support Department.

### Relevant contacts

- Customer Support Department email: [support@finmarket.com](mailto:support@finmarket.com)
- Compliance Department email: [compliance@finmarket.com](mailto:compliance@finmarket.com)

### Client's dissatisfaction

In cases where a client is dissatisfied with the Company's approach and final response, the client can either request from the Company to review the case again or directly he/she can address the issue to Financial Ombudsman Service or to the Cyprus Securities and Exchange Commission (CySEC).

For the Financial Ombudsman Service, please be referred to the information below:

If you are an individual, or a legal entity, trust or charitable entity that can be categorized as a consumer under the legislation governing the creation and operation of an Alternative Dispute Resolution framework in Cyprus (Financial Ombudsman), you are entitled to escalate the complaint to the Financial Ombudsman if the solution or action taken / provided by the Company is not to your satisfaction or if the Company does not respond at all. In addition, clients may address their complaints to the Financial Ombudsman of Cyprus, provided that each complaint does not exceed the amount of one hundred and seventy thousand-euro (€170,000), within four (4) months after the Company provides its final response.

If the client does not accept a decision taken by the Financial Ombudsman, he/ she may take civil action by taking his/ her case to court. Further information can be found on [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy).

The Financial Ombudsman can be contacted as follows:

Address: 13 Lord Byron Avenue, 1096 NICOSIA

Phone: 22848900 (main number)

Fax: 22660584, 22660118

E-mail: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

Financial Ombudsman: [fin.ombudsman@financialombudsman.gov.cy](mailto:fin.ombudsman@financialombudsman.gov.cy)

The complaint form shall be accompanied by the evidence of the paid fee (€20).

*The payment can be done at any of the following banks:*

- (1) Cooperative Central Bank (Συνεργατική Κεντρική Τράπεζα) or Cooperative Institution, IBAN: CY16 0070 1010 0000 0000 4002 8214
- (2) Hellenic Bank (Ελληνική Τράπεζα) IBAN: CY78 0050 0109 0001 0901 7087 6401
- (3) Bank of Cyprus (Τράπεζα Κύπρου) IBAN: CY52 0020 0195 0000 3570 1944 4789

For more information, please visit the website [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

For any further questions of information, do not hesitate to contact us [support@finmarket.com](mailto:support@finmarket.com)