



FINMARKET
Your Gateway To The Financial Market

Complaints Handling Procedure

December 2020

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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 addressed to the Customer Support Department (support@finmarket.com), which in cooperation with the Compliance Department shall resolve the complaint based on the procedure mentioned in the following paragraphs, and by liaising with all departments/personnel that are connected with the complaint(s) received. The Client shall complete and forward to the aforesaid email above, the duly completed Client Complaint Form (see Appendix I), which includes the following information:

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
- The extent in financial terms of the potential loss that the Client claims has suffered
- Reference to any correspondence exchanged between the Company and the client (such correspondence should be attached).

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 CySEC's Circular C338; the client is advised to save his/her unique reference number to be used 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 (by including inter alia, the unique reference number provided to complaints);
- (iii) Within two (2) months 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 a final answer to the Complaint shall be given within three (3) months;
- (iv) 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.

The responsible Departments 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.

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. The Company maintains an internal registry where all relevant details/information are maintained and the Customer Support Department is responsible to duly complete and/or update such accordingly.

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 CySEC's Circular C338.

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
- Compliance Department email: compliance@finmarket.com

Client's dissatisfaction

In cases where a client is dissatisfied with the Company's approach and final response, the client may directly submit his/her complaint to the 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 two hundred and fifty thousand euro (€250.000) within four (4) months from either the date of receipt of the reply from the Company or the deadline of the three (3) month period during which the Company had to respond to the client.

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.

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

Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy

For more information, please visit the website www.financialombudsman.gov.cy

For any further questions of information, do not hesitate to contact us support@finmarket.com

Review date: December 2020.

APPENDIX I – Client Complaint Form

COMPLAINTS FORM

This is the form you need to fill in if you wish to submit your complaint to K-DNA Financial Services Ltd (the “*Company*”). Complete, up-to-date as well as accurate information is required to be provided to the Company for the proper investigation and evaluation of your complaint.

Please note that the below Complaint Form is only indicative and not exhaustive. The Company may request further information and/or clarifications and/or evidence as regards your complaint.

DATE:

CLIENT INFORMATION

Name:

Surname:

ID or Passport Number:

Country of nationality:

Legal Entity Name (in case the Client is a legal person):

Account Trading Number:

CONTACT DETAILS OF THE CLIENT

Postal Address:

City/ Province:

Code:

Country:

Telephone Number:

Email:

Please advise your most convenient method of communication:

DETAILS OF THE COMPLAINT

Date when the Complaint was created:

Employee who offered the services to the Client:

Description of the Complaint: (use a separate sheet if necessary)



I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.

FOR OFFICIAL USE ONLY

Received on:

Received by:

Assigned to:

To reply by: