

CLIENT COMPLAINT HANDLING POLICY

Effective: 1 October 2022

Introduction

Exclusive Best Change Zrt. (H7621 Pécs, Citrom utca 2-6. földszint 26. ajtó); hereinafter referred to as „**Service Provider**”), as a currency exchange agent acting as a principal intermediary of Raiffeisen Bank Zrt. (H-1133 Budapest, Váci út 116-118.), aims to provide high quality service to its clients. Improving services and processes to better meet our clients’ needs is a priority. Therefore, the Service Provider shall handle complaints received from the Clients in accordance with the applicable legal provisions in force at the time, involving the Financial Institution under contract with the Service Provider.

Accordingly, the Service Provider shall ensure that the Client may communicate his/her complaint regarding the conduct, activity or omission of the Service Provider either verbally (in person or by telephone) or in writing (in person or by means of a document delivered by another person, by post, fax, e-mail).

I. Definitions of complaint handling

1. *The definition of a customer complaint*

1.1 . Any objections relating to the conduct, activity or omission of the service provider before the conclusion of the contract or in connection with the conclusion of the contract, the performance by the service provider during the contractual relationship, upon the termination of the contractual relationship or thereafter, in connection with the contract.

A Client Complaint is any complaint communicated by the Client to the Service Provider or to the Financial Institution under contract with the Service Provider in any of the ways set out in Chapter II of this Policy.

1.2 A request submitted by the Client to the Service Provider or the Financial Institution for general information, opinion or statement shall not be considered a Client Complaint.

2. *Definition of Client*

2.1 A Client is any natural person, legal entity or unincorporated business entity, organisation or public authority, or their authorised representative, who enters into a business relationship with the Service Provider, regardless of whether or not they have a valid contract with the Service Provider.

3. *Recommended content of a client complaint*

3.1 In order to investigate the client complaint as soon as possible, it is necessary that the Client should always provide his/her personal data, specify precisely and concretely his/her observations, the deficiency or error detected and,

if available, provide the Service Provider or the Financial Institution with the supporting documents in order to speed up the complaint investigation process.

3.2 In order to ensure a prompt investigation of the complaint, it is necessary for the Client to specify the exact location of the event or fact which constitutes the subject of the complaint and, if possible, also the time thereof and any possible claim for compensation.

4. *Customer service*

For the purpose of receiving client complaints, the Service Provider's and the Financial Institution's premises open to clients, as well as their headquarters and their unit accessible by telephone or Internet, shall be considered as customer service.

5. *Financial institution*

Raiffeisen Bank Zrt. (H-1133 Budapest, Váci út 116-118.), which as a Credit Institution, has an intermediation agency contract with the Service Provider for the provision of currency exchange services.

6. *Service Provider*

Exclusive Best Change Kft., which is in an agency relationship with the Financial Institution for the exchange of currency. The Service Provider carries out the currency exchange activity in the territory of Hungary, on the basis of the law and the agency contract, as a principal intermediary for the benefit of the Credit Institution, on its behalf and under its responsibility.

7. *Currency exchange activity*

The purchase and sale of foreign currencies for the legal tender and the purchase and sale of foreign currencies for foreign currencies. The exchange of currencies by a payment service provider in connection with a payment service, the distribution of coins and banknotes denominated in foreign currency in circulation or convertible into circulation for numismatic purposes, and the execution of payments for goods and services in domestic trade are not considered as currency exchange activities.

II. Means of reporting a complaint

1. **Verbal complaint**

1.1 The Client may submit a report:

a) **personally:**

Verbal complaints may be made at any of the premises of the Service Provider or the Financial Institution open to clients during its opening hours, where the Service Provider or the Financial Institution staff shall take a record of the Client's complaint, which shall be signed by both parties and a copy of which shall be provided to the Client.

The exact address and opening hours of the Financial Institution's branches can be found on its [website](#).

b) **by telephone:**

Complaints can be made via the Raiffeisen Direct Customer Service by calling +36 80 488 588 (0-24 hours, 7 days a week).

- Telephone communications between the Clients and the Financial Institution shall be recorded by the Financial Institution and kept for five years.
- Upon the Client's request, the Financial Institution shall ensure the replay of the audio recording and provide a certified transcript of the audio recording free of charge within twenty-five days.

2. Written complaint

2.1 The Client may submit a letter of complaint:

- a) **personally or;**
- b) **by post** to Raiffeisen Bank Zrt., Central Complaints Handling Group (Budapest, H-1700 or H-1133 Budapest, Váci út 116-118.)
- c) **by telefax** at the telefax number +36 1 484-4444, addressed to Raiffeisen Bank Zrt., Central Complaints Management Group;
- d) **by e-mail** to info@raiffeisen.hu, which shall be received by the Financial Institution on a continuous basis.

The Service Provider and the Financial Institution shall provide a dedicated **Complaint Reporting Form** in the premises open to clients, but the report may be accepted in any form.

2.2 The Client may act by an authorised representative. If the Client acts by proxy, the authorisation must be a notarial deed or a private document with full probative value, and the authorisation must comply with the requirements of Act No. CXXX of 2016 on the Code of Civil Procedure and Act No. CCXXXVII of 2013 on credit institutions and financial undertakings. A sample authorisation form can be found on the website of the Financial Institution. In the absence thereof, the Service Provider or the Financial Institution will not start investigating the complaint submitted by the authorised representative until the authorisation is received.

In the case of a Client acting by an authorised representative, the complaint must be accompanied by the original copy of the authorisation.

III. Investigating a complaint

1. General rules

1.1. The complaint is investigated free of charge, no extra fee shall be charged by the Service Provider or the Financial Institution. The complaint shall be investigated in the light of all relevant circumstances.

1.2. When handling complaints, the Service Provider and the Financial Institution shall act in such a way as to avoid, to the extent possible under the circumstances, the development of a consumer financial dispute.

2. Verbal complaint

2.1. Complaints made in person, directly to the Service Provider or the Financial Institution – will be promptly investigated and, if possible, remedied by the Service Provider or the Financial Institution.

2.2. In the event of a verbal complaint made by telephone, the Financial Institution shall proceed as normally expected in the circumstances in order to ensure that the complaint is made live within five minutes of the successful completion of the call. The Financial Institution shall keep a record of the issue.

2.3. In the case of a verbal complaint by telephone, the Financial Institution shall inform the Client that the complaint is being recorded. The Financial Institution keeps an audio recording of verbal complaints for 5 years. Upon the Client's request, the Financial Institution shall ensure the replay of the audio recording and shall provide a certified transcript of the audio recording free of charge.

2.4. If the Client does not agree with the immediate handling of the complaint, the Service Provider or the Financial Institution shall take a record of the complaint and its position thereon, and, in the case of a verbal complaint made in person shall provide the Client with a copy of the record, or in the case of a verbal complaint made by telephone together with the response to the complaint. In the latter case, the Financial Institution shall send the reasoned opinion on the complaint to the Client within 30 calendar days of the receipt of the complaint.

2.5. The log can be used to record the following:

- a) the Client's name;
- b) Client's address, registered office and, where applicable, postal address;
- c) the place, time and manner of the lodging of the complaint;
- d) a detailed description of the Client's complaint, recording separately the objections to which the complaint relates, in order to ensure that all the objections contained in the Client's complaint are fully investigated;
- e) the number of the contract concerned by the complaint, depending on the case, the Client number;
- f) a list of documents, records and other evidence presented by the Client;
- g) if it is not possible to investigate the complaint immediately –except in the case of a verbal complaint made by telephone– the signatures of the person who took the report and the Client;
- h) if it is not possible to investigate the complaint immediately –except in the case of a verbal complaint made by telephone– the signatures of the person who took the report and the Client;
- i) time and place of recording the complaint;
- j) the name and address of the service provider affected by the complaint.

2.6. In case of the rejection of a complaint, the Financial Institution shall inform the Client in its reply of the legal remedies available to the Client (which are also set out in Chapter No. V of this Policy) and provide the contact details and mailing addresses of the relevant authorities and bodies.

2.7. If the Client re-submits a complaint with the same content as the previously submitted one, which was rejected by the Financial Institution, and the Financial Institution maintains its previous position, it may also fulfil its obligation to respond by referring to the previous reply letter and providing the information required in case of rejection of the complaint.

3. Written complaint

3.1. It is the right and the duty of the Central Complaints Handling Unit of the Financial Institution to supervise the investigation of and respond to customer complaints. The reasoned position on the written complaint shall be sent by the Financial Institution to the Client within 30 calendar days after the receipt of the complaint by the Service Provider or the Financial Institution.

IV. Data that may be requested from the Client in the course of complaint handling

1. The Service Provider or the Financial Institution may, in particular, request the following data from the Client in the course of complaint handling:

- a) name;
- b) residence, registered office, postal address;
- c) phone number;
- d) notification method;
- e) the product or service affected by the complaint;
- f) description of the complaint, cause;
- g) the Client's claim;
- h) a copy of any documents in the Client's possession which are necessary to substantiate the complaint and which are not available to the Service Provider;
- i) for a Client acting by proxy, a valid authorisation;
- j) any other data necessary to investigate and respond to the complaint.
- k) any other data necessary to investigate and respond to the complaint.

2. The data of the Client submitting the complaint shall be processed in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and Act No. CXII of 2011 on the Right to Information Self-Determination and Freedom of Information.

V. Information obligation concerning complaint handling

1. If the complaint is rejected or the 30-day statutory time limit for responding to the complaint expires without result, the Client who qualifies as a consumer may apply to the following bodies or authorities:

- a) **Financial Arbitration Board** (for disputes relating to the conclusion, validity, effects and termination of a contract, as well as for disputes relating to breach of contract and its effects),

(registered office: MNB H-1054 Budapest, Szabadság tér 9, postal address: H-1525 Budapest BKKP Pf.: 172, telephone: +36-80-203-776, e-mail: ugyfelszolgalat@mnbb.hu, customer service address: H-1122 Budapest, Krisztina krt. 6., location of hearings: H-1133 Budapest, Váci út 76.)

b) **National Bank of Hungary** (registered office: H-1013 Budapest, Krisztina körút 55., postal address: H-1534 Budapest BKKP Pf: 777, telephone: +36-80-203-776, e-mail address: ugyfelszolgalat@mnbb.hu, Customer Contact Information Centre: H-1122 Budapest, Krisztina körút 6.);

c) **court:**

- to the Commercial Arbitration Court under an arbitration clause in the individual contract (H-1055 Budapest, Markó u. 25.)
- in the absence of a contractual arbitration clause, to the ordinary court specified in the individual contract or, in the absence thereof, to the competent court according to the rules of the Code of Civil Procedure (Act No. CXXX of 2016).

2. If the complaint is rejected or the 30-calendar-day statutory time limit for responding to the complaint expires without result, the Client who does not qualify as a consumer may apply to the court.

3. For information on the availability, detailed rules and costs of procedure of the various bodies, authorities and courts, please contact the relevant bodies, authorities or courts.

4. To the Client who qualifies as a consumer a financial consumer protection petition (hereinafter referred to as "Petition") is available, pursuant to Chapter No. V, Section 1 of this Policy, if the Client applies to the Financial Arbitration Board or the National Bank of Hungary. The Petition is available on the official website of the National Bank of Hungary:

<https://www.mnbb.hu/fogyasztovedelem/penzugyi-panasz#formanyomtatvanyok>

and at the personal customer service of the National Bank of Hungary (H-1122 Budapest, Krisztina krt. 6.).

The Client has the possibility to request the Petition from the Service Provider and the Financial Institution free of charge, by one of the following options, on the basis of which the Service Provider will send it to the Client without delay (the electronically requested Petition by electronic means, otherwise by post):

a) in person or by means of a document delivered by an appointee, at the premises of the Service Provider or the Financial Institution open to customers during its opening hours;

b) by post addressing it to Raiffeisen Bank Zrt. (Financial institution), (Budapest, H-1700 or H-1133 Budapest, Váci út 116-118.)

c) by e-mail to info@raiffeisen.hu, which shall be received by the Service Provider on a continuous basis.

d) by telephone: Via the Raiffeisen Direct Customer Service by calling +36 80 488 588 (0-24 hours, 7 days a week).

VI. Registration of the complaint

1. The Financial Institution keeps records of the complaints received and the measures taken to settle and resolve them, which are recorded and processed in its computer system. Each report has a separate identifier so that it can be retrieved at any time at the Client's request. The following is recorded in the complaint handling system:

- a) a description of the complaint, stating the event or fact which is the subject of the complaint;
- b) the date of lodging the complaint;
- c) a description of the measure taken to settle or remedy the complaint and, in the event of refusal, the respective reasons;
- d) the deadline for completing the measure and the name of the person responsible for implementation;
- e) the date of posting of the reply letter to the complaint.

2. The Financial Institution shall keep the complaint and the reply for five years on record and present it to the National Bank of Hungary upon request.