

 Clients Complaints Handling Policy

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1. **Scope and Introduction**

Finalto (BVI) Limited (“**FinaltoBVI**” or the “**Company**” or “**we**”) is an authorized and regulated by the B.V.I Financial Services Commission (“**B.V.I. FSC**”) under the Securities and Investment Business Act, 2010, license number SIBA/L/14/1067. As such, the Company established the Clients Complaints Handling Policy (the “**Policy**”) to develop the framework which will enable you to exercise your rights.

The purpose of this document is to inform you of the procedure which will be followed in order to provide a resolution for the complaint which you have submitted.

The Company has adopted the following Clients Complaints Handling Policy specifically designed **for clients (the “Policy”)** in order to ensure its corporate culture for Treating Customers Fairly (“TCF”). This Policy is designed to promote reasonable and prompt handling of complaints, disputes, or grievances received from Clients, referred to as the “**Client**”, the “**Complainant**” or “**You**”).

We aim to provide a high level of service to all of our Clients at all times to build a strong and long-lasting service relationship with you. We We acknowledge that from time to time things can go wrong or there can be misunderstandings. Therefore, we are centrally committed to dealing with queries and complaints, recognizing that a client's feedback and/ or expression of dissatisfaction is an opportunity for us to improve by enhancing our products and level of service.

Accordingly, we established transparent procedures to implement reasonable, effective and prompt handling of Complaints; while maintaining records of each Complaint in line with B.V.I. FSC’s legislative requirements.

“**Query**”- shall be any form of dissatisfaction with our provided services.

“**Trading Query**”- shall be any form of dissatisfaction with our services which relate to your trading account and platform activities.

“**Complaint**”-shall mean an expression of dissatisfaction by a Client regarding the provision of investment and/ or ancillary services provided to him/her by the Company.

1. **Queries and Complaints**

**Query** – Usually resolved within 48 hours

If you are dissatisfied with theserviceprovided by us, please contact our Customer Service as soon as possible by **phone** at +44 2080 979 794, or e-mail at cs@finalto.com.

Our representatives are available to assist you through your concerns to reach to a fair conclusion.

**Trading Query** – Usually resolved within 48 hours

If you have a **trading query** relating for example to your trading account and the operation of this on our trading platform, you can submit a trade enquiry by **phone** at +44 2080 979 794, or e-mail at cs@finalto.com. Please note that all trading enquiries must be logged with us as quickly as possible after the trading enquiry, need for clarification or issue have occurred.

A dedicated team of professionals is available to research and resolve your trading query the soonest – we are committed to responding the latest within 48 hours of receipt of your Trading Query. Once your trading query has been examined you will receive a full explanation of the circumstances and the outcome.

**Complaint** – Process can take up to two (2) months to resolve

You are entitled to submit a complaint at any time in your trading experience with us, where you may feel that our service has not met your satisfaction. Where any trading or other query has not been addressed or when you wish to submit a **formal complaint** at the initial or a subsequent stage, you can do so by contacting us at cs@finalto.com.

When submitting your complaints please include the following information in order for our dedicated Quality Control Department to examine your complaint in an informed manner:

* Full Name
* Account number
* Date of the Event in Dispute
* Date you Noticed the problem
* Summary of your complaint
* Any supporting documentation to your claims

We may request further information and/or supportive documentation during the review process. We ask for your valued cooperation in the review process of your complaint in order to complete our work and provide you with our feedback and response the soonest possible.

1. **Handling Your Complaints**

Upon receipt of the complaint, we will examine your claims and record the receipt of an official Complaint. Upon the recording of your complaint, it will be given a Unique Reference Number (“**URN**”) which will also be communicated to our regulator, B.V.I. FSC.

The process that we envisage will be followed in dealing with your complaint is as follows:

* We will acknowledge receipt of your complaint within 5 days, or as soon as practicable, providing you with the recorded URN which will be quoted in all communications directed to you from the Company regarding the Complaint, while informing you that the Complaint is being investigated;
* We will endeavor to have your complaint resolved within a period not exceeding two (2) months from the submission date of your complaint. However, it should be noted that the full completion of our review and response to your complaint shall not exceed two (2) months from the submission date.

We will investigate the claims, the evidence the Complainant has provided, and the evidence in our records. As part of our investigation, we may share and receive information (including personal, financial and trading data) regarding a Client complaint with/from third parties (e.g. with the B.V.I. FSC, the Financial Ombudsman of B.V.I, our legal advisors or with another subsidiary company) in line with our Privacy Policy.

Further clarifications and information relating to the Complaint may be requested from the Client within a time frame of two (2) months. Once a Complaint’s investigation is completed, a Final Response shall be communicated to the Client with the investigation outcomes, clarifying explanations and any remedy measures the Company intends to take for the resolution of the complaint.

Worth to note, should a Client fail to reply to any communication from the Company (including the Final Response) for a period of exceeding one (1) month, the Company will consider the Complaint closed.

Upon the receipt of our Final Response on your complaint you are not satisfied or in case no response is received within the two (2) months’ timeframe, you can refer your complaint to the B.V.I. FSC. For more information please visit <http://www.bvifsc.vg>.

1. **Disclosure and Update of the Policy**

This Policy shall be regularly reviewed and updated in line with applicable legislation updates.

1. **Record Keeping and Reporting**

The Company, in line with the Regulatory and legislative requirements is required to keep updated records of all the received and registered with details of the investigations conducted, the final outcomes, settlement measures undertaken and all the communication with the Clients in line with our Privacy Policy.

Appropriate records shall be maintained in this respect and the Compliance Department shall regularly monitor and review the Company’s compliance with the applicable regulatory requirements for handling Client Complaints and the record keeping held.