



PhoenixLtd

Complaints Policy

Last Updated – September 2022





1. Scope.

We, Phoenix Ltd (hereinafter, the “Company”), have adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

2. Applicable Procedure for Submission of Queries and Complaints

Submitting a Query

- 2.1.1. If the Customer has any query regarding his account, or he is dissatisfied with the Company’s services, in the first instance, the Customer should contact the Company’s Customer Support Department via e-mail, live chat, telephone or any other official method of communication made available by the Company, as the vast majority of queries and issues can be dealt with at this level.
- 2.1.2. The Company’s Customer Support Department will try to resolve the Customer’s query immediately. If the Customer’s query cannot be resolved immediately, the Company remains committed to addressing and resolving it in a prompt manner (usually within 3 business days). If additional time is required, we will issue a holding response in writing and we will indicate when we will make further contact to inform you of the investigation process and outcome.
- 2.1.3. If you are not satisfied with the final response received by the Customer Support Department, then you may raise this further, following the procedure described in Section 2.2. below ‘Submitting a Complaint’.

Submitting a Complaint

- 2.1.4. Further to the above, any Customer who is not satisfied with the final response received by the Customer Support Department and would like to raise a query further, may submit its complaint in writing to the dedicated email which is: complaints@ltdphoenix.com
- 2.1.5. The Company may accept complaints brought by third parties acting on behalf of a Customer (Authorised Representatives), as long as the Customer authorised in writing the third party and provides this authorisation as evidence to the Company via his/her registered email. When the Complaint is submitted by a representative or other duly authorized person, the Company will investigate the legal basis of the submission, which must be presented by the Complainant in a format required by law. If no authorization is available, the Company will approach the Complainant directly, in order to accelerate the procedure.



- 2.1.6. The Complaint submitted should include truthful, complete and accurate information. The Customer can also use supporting documentation to accompany his/her Complaint. The information required through the Complaint submitted is indicative and additional information and/or clarification and/or evidence might be requested, for the Company to be able to handle / tackle the Complaint promptly and efficiently.
- 2.1.7. Upon the successful submission of the Complaint, and within five (5) working days we will acknowledge receipt of the same. We will then carry out an impartial review of the matter and communicate to the Customer the outcome of the Company's investigation and propose remedial actions (if applicable) within fifteen (30) working days from the date of the Company's acknowledgement.
- 2.1.8. In the unlikely event that the Company is unable to respond within fifteen (30) working days, the Company will inform the Customer of the reasons for the delay and indicate the period of time within which it is possible to complete the investigation.

3. Additional Information on Queries and Complaints

- 3.1. The Company may require at any given time during the examination and handling of queries and complaints from the Customer to provide additional information, clarifications and/or documentation and the Customer's full cooperation in order for the Company's investigation to be concluded.
- 3.2. The Company may decide to extend the investigation timeframe, or put the matter on hold, or consider the matter as closed if the Customer fails to respond adequately and/or within a reasonable timeframe or within the designated timeframe.
- 3.3. Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint.
- 3.4. We encourage the Customer to lodge his / her query and/or complaint within a reasonable time from the moment the matter occurs. The Complainant, if possible, should report the event or the date of the occasion and the subject of the Complaint to the Company, as soon as possible. This is necessary to enable the Company to investigate the Complaint as efficiently as possible.



3.5. The Company is entitled to treat a Query or Complaint as closed in the following circumstances, among others:

- a) where it is determined that no further action is required by the Customer and/or the Company, upon the issuance of the final decision by the Company, and/or
 - a) where the matter has been mutually resolved, and/or
 - b) where the Customer has failed to respond to our officers within the period of three (3) months from the date of the submission of your complaint.
 - c) where the Company has given a substantive response and the Customer has failed to indicate that the response is unsatisfactory and/or substantiate the claim with relevant data, within a reasonable timeframe. The Company shall notify the Customer upon the closure of a query or complaint.

4. Response to Complaints

The Company follows the outlined procedures to ensure that the Complainant's complaint is resolved within a period of a maximum of thirty (30) business days. This response, including the reasoning, is always send in writing to the Complainant to his provided email address. Some Complaints can be resolved more quickly depending on the facts and the nature of the Complaint. If the Complaint is more complex and takes longer than thirty (30) business days to resolve, the Company will communicate the reasons for the delay. Sometimes the complainant is requested to supply additional information required for investigating the Complaint.

When the Complaint is submitted by another person or with a method unsuitable for establishing proper authorization of the submission, the Company may ask the person authorized to submit the Complaint to confirm the complaint in question.

The Company adds a an adequate, clear and unanimous reasoning to every decision brought down in order to settle complaints, which shall be emailed to the Complainant in writing. If the decision refers to a legislation, not only the legislation, but also relevant regulations must also be included in the above reasoning (if applicable).

5. Settlement of Disputes

When disputes between the Company and the Complainant cannot be settled by the official Company procedure, the Customer may source alternative routes to lodge his/her Complaint. If further to the investigation conducted by the Company, the Complaint of the Customer is rejected by the Company and/or is not resolved, the Complainant may lodge an appeal to the FSA, in order for the required enforcement actions to be taken. More information for the Customer is accessible via the FSA website <https://fsaseychelles.sc/complaint-handling> and also below:



Financial Services Authority (FSA):

It is mandatory for complainants to fill in the Complaints Handling Form before any complaint is investigated by the Financial Services Authority.

All the information indicated on the form must be provided. The Complaint Handling Form, which is available on the FSA website can be submitted by any of the following ways:

1. Email address:	complaints@fsaseychelles.sc
2. Formal letter addressed to:	The Chief Executive Officer Policy (Information & Communication Unit) Financial Services Authority Bois De Rose Avenue P.O Box 991, Victoria Mahé, Seychelles
3. Hand-delivered directly to the Authority:	Bois De Rose Avenue, P.O. Box 991, Victoria, Mahe, Seychelles
Link to complaint handling form	https://fsaseychelles.sc/other-fsa-documents/complaint-form/download



PhoenixLtd

Phoenix LTD is authorised and regulated by the Financial Services Authority (FSA) of Seychelles with license number: SD113. Phoenix LTD's registration number is 8430083-1.

Registered Address: Block B, Global Village, Jivan's Complex, Mont Fleuri, Mahe, Seychelles

Website: ltdphoenix.com

Email: info@ltdphoenix.com

