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Armadillo Financial Technologies

Customer Complaints Procedures

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Purpose of this Document

This document sets out AFT's policy of receiving and dealing with complaints made by its clients. AFT is committed to treating its customers fairly and to ensuring that any complaints that you may have about the products or services provided to you by us are dealt with quickly and fairly. If you have any questions about this document or on your rights of complaint to AFT, please do not hesitate to contact the CEO, who has responsibility for oversight of the Company's compliance with the Financial Conduct Authority's (FCA) rules in relation to client complaints.

The FCA has issued specific rules governing the manner in which regulated firms are to handle customer complaints (see FCA Handbook: Dispute Resolution: Complaints (DISP)). The FCA's rules relating to complaints are designed to lay down minimum standards for the proper handling and resolution of complaints received from clients. This is to ensure that complaints are handled fairly, effectively and promptly, minimising the number of complaints that need to be referred to the Financial Ombudsman Service. This purpose is consistent with the FCA's consumer protection regulatory objective.

1. Making a Complaint

If you are a client or a potential client of AFT and you are dissatisfied with any aspect of your dealings with us, you have the right to complain to us. You may make such a complaint in writing, over the telephone, or in any other usual method of communication which is convenient for you.

2. Dealing with Your Complaint

As soon as we receive your complaint, it will be referred to the CEO, who will take full responsibility for resolving the issue. The CEO will liaise on your behalf with the relevant department within our business and if required, you will be contacted and asked to provide as much information as you can in relation to the complaint. We will endeavour to resolve the complaint to your satisfaction within one business day.

If we are unable to resolve your complaint within one business day, we will acknowledge your complaint in writing and we will keep you up to date as matters progress. You are free to contact us at any time if you have any questions.

At the earliest opportunity, and within 15 business days of receipt of your complaint, we will send a final written response to you which either:

- i. Accepts the complaint and, where appropriate, offers redress or remedial action; or
- ii. Offers redress or remedial action without accepting the complaint; or
- iii. Rejects the complaint and gives our reasons for doing so; or
- iv. Explains why it is not possible to make a final response and indicates when we expect to be able to do so.

In exceptional circumstances where, for reasons beyond our control, we are unable to meet the 15-day deadline, we will send our final response by the end of 35 business days from receipt of the complaint.

At this point we will also provide you with full details of how you can refer your complaint to the Financial Ombudsman Service if you are dissatisfied with our response.

3. Right to Refer to Financial Services Ombudsman Services

Where we are not able to resolve your complaint to your satisfaction, you may be permitted to refer your complaint to the Financial Ombudsman Service. Please be advised you must do this within 6 months. Should this be necessary, AFT will provide you with full details of how to do this.

3.1. Eligible Complainants

An eligible complainant is a complainant that is

- A consumer (a person acting outside their trade, business or profession)
- A micro enterprise (enterprise which employs fewer than 10 people and has a turnover or balance sheets that does not exceed EUR 2,000,000)
- A charity with an annual income of less than £6,500,000
- A trustee of a trust which has a net asset value of less than £5,000,000
- A consumer buy to let (CBTL) consumer
- A small business (enterprise which has an annual turnover of less than £6.5 million and employs fewer than 50 people or has a balance sheet total of less than £5 million)
- A guarantor

If in doubt whether a complainant is an eligible complainant or not, the Firm will treat them as an eligible complainant. Only eligible complainants can refer their complaints on to the Financial Ombudsman Service.

If you are an Eligible Complainant, and we are not able to resolve your complaint to your satisfaction, you may be permitted to refer your complaint to the Financial Ombudsman Service. Please be advised you must do this within 6 months of your initial complaint.

3.2. Non-Eligible Complainants

If you do not qualify as an eligible complainant, and where we have not been able to resolve a situation to your satisfaction, you will not be able to make use of the Financial Ombudsman Service. In those situations we will nominate an independent, a commercial dispute resolution service to resolve the matter.