

# Complaints Handling Policy

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## Introduction

InvestFW is a trade name of Itrade Global (CY) Ltd (hereinafter called as the “Company” or “InvestFW”). The Company is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 335424. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission (hereafter the “CySEC”) under the license number 298/16.

This Complaint Handling Policy (hereinafter referred to as the “Policy”) sets out the processes employed by the Company when dealing with complaints received by clients.

## The policy

The purpose of this Policy, as mentioned above, is to outline the procedure in place regarding the handling for all client complaints, to ensure the Company’s compliance with the applicable laws, rules and/or regulations, as well as operate in line with the complaint handling procedures as stipulated and expected by CySEC.

For the purposes of this Policy, ‘complaint’ shall mean an expression of dissatisfaction by a Client regarding the provision of investment and/ or ancillary services provided to him/her by InvestFW.

## How to Submit a Complaint

All clients’ complaints are handled by our Compliance Department. To file a Complaint, the complainant shall complete the Complaint Form developed by the Company (see **Annex 1** attached hereto) or send an email at [complaints@investfw.com](mailto:complaints@investfw.com).

The following information should be provided by the Client to assist the Company to handle the complaint submitted:

- Full name of the client;
- ID/Passport number;
- Email
- Phone Number;
- Address;
- Account Number;
- Date when the issue and/or problem first took place (i.e. date of the incident);
- Summary of the complaint;
- Disputed amount and currency; and
- Provide, where applicable, any other document or otherwise relevant to the complaint.

Once completed, it should be sent to our Compliance Department, in one of the following ways:

- In a hard copy along with a copy of the complainant’s identification document and any other additional documentation relevant to the complaint, to the Company’s head offices, which are located at Gladstonos 99, Elnor Hermes Building, 3rd Floor, 3032 Limassol Cyprus; or
- By e-mail at [complaints@investfw.com](mailto:complaints@investfw.com)

## Handling of Complaints

Within five (5) working days from the date of receipt of a Complaint, the Company will send a written acknowledgement email to the client, confirming safe receipt of the Complaint and that all necessary steps will be taken towards its resolution. Additionally, the Company will give an estimated timeframe required to resolve the said Complaint along with the Unique Reference Number which will be assigned to the Complaint. The complainant should use this unique reference number in all future contact with the Company, the Financial Ombudsman and/or the CySEC regarding the specific complaint.

Following acknowledgement of the Complaint, the Company will investigate the Client's Complaint. In investigating a client's Complaint, the Company takes into account the subject matter of the Complaint, the evidence the Client has provided (where applicable), and the evidence in the Company's records.

Within two (2) months, the Company will reply to the complainant about the outcome and/or decision. During the investigation of the Complaint, the Company will inform the complainant of the handling process of his/her Complaint.

Where the Company is unable to respond within the two (2) month timeframe, it will inform the complainant of the reasons for the delay and indicate the period of time that needed to complete the investigation. In any case, this period of time cannot and will not exceed the three (3) months from the submission of the Complaint.

When we reach our final decision, we will inform you without delay and we will provide you with an explanation of our position and propose remedial measures (if applicable). We will consider a Complaint as resolved once we have sent you in writing our final decision.

Furthermore, should a client fail to reply to any communication from the Company (including the Final Response) for a period of greater than one (1) month, the Company will consider the Complaint time-barred and closed.

## Financial Ombudsman

In the event where you are not satisfied with our assessment and decision, you can refer your complaint to the Financial Ombudsman, given that:

- You first filed a Complaint to the Company within fifteen (15) months from the date that you became aware or reasonably should have become aware of the reason of your complaint;
- You received the Company's final response and/or decision within three (3) months from the date that the Company acknowledged receipt of your complaint and it is not to your satisfaction, or did not received a reply from the Company and the three-month period has expired;
- You must submit your complaint to the Financial Ombudsman within four (4) months from either the date you received the Company's final response or the deadline of the three-month period during which the Company had to reach and provide you with its final response/decision;
- No decision has been issued by a Court of the Republic for the same Complaint or no judicial procedure is pending for the enquiry of the same complaint.



Financial Ombudsman contact details:

Address: 15 Kypranoros, 1061 Nicosia, or P.O. Box 26722, 1647 Nicosia

**Phone:** +357 22 84 89 00

**Fax:** +357 22 66 05 84, +357 22 66 01 18

**Email:** [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)

**Website:** [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

Please note that the CySEC does not have restitution powers and therefore does not investigate individual complaints. However, all Complaints submitted to the CySEC are taken into consideration in the performance of its supervisory mandate.

**Annex 1: Complaints Form****Client Information:**

<b>Full Name:</b>	<b>Account Number:</b>
<b>ID/Passport No.:</b>	<b>Address:</b>
<b>E-mail:</b>	<b>Telephone:</b>

**Brief Summary of the complaint:**

<b>Date of the Incident:</b>	<b>Disputed Amount &amp; Currency:</b>
<b>Description of the incident:</b>	

<b>Signature:</b>	<b>Date:</b>
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