

## **ALPHA INVESTOR SERVICES MANAGEMENT S.A.**

### **Complaint management policy**

Version 07/2020

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## **General principles**

The purpose of this policy is to highlight the procedures and principles put in place by Alpha Investor Services Management S.A. ("AISM S.A.") with regard to processing of customer complaints.

The policy has been developed on the basis of CSSF Regulation No. 16-07 of October 26, 2016 relating to the out-of-court complaints resolution.

## **Complaints management policy**

CSSF Regulation n° 16-07 on out-of-court complaints resolution and section 5.5.5 of CSSF Circular 18/698 require professionals in the financial sector to set up and formalize internal complaints management procedures in writing.

AISM S.A. has put in place a procedure to ensure appropriate treatment and prompt resolution of customer complaints as well as the identification and mitigation of potential conflicts of interest, while taking into account the interests of its customers.

## **Définitions**

Aux fins de l'article 1 du règlement n ° 16-07 de la CSSF :

- "complainant": any natural or legal person having filed a complaint with a professional;
- "professional": any natural or legal person falling under the prudential supervision of the CSSF;
- "complaint": complaint filed with a professional to recognise a right or to redress a harm.

## **Complaint submission procedure**

The complainant can lodge his complaint, free of charge, in one of the three languages used by AISM S.A. (namely English, French and Italian) and the communication must clearly indicate that it is a complaint.

Complaints must always be sent in writing to the following address:

**Alpha Investor Services Management S.A.,**

21, Rue Aldringen,

L-1118 Luxembourg

To the attention of the Compliance Officer

Or via an email to the following email address [compliance@aism.lu](mailto:compliance@aism.lu)

Or via a fax to the following number (+352) 27 47 35 72.

The complainant must in all cases indicate his full contact details (name and surname, address, telephone number) as well as the subject of his claim and describe precisely the alleged dysfunction of the services provided - if necessary, by providing supporting documents - in order to the person in charge of processing the complaint to assure an effective remediation.

### **Complaints handling process**

All complaints received from a complainant is dated the day of its receipt by AISM S.A.

A written acknowledgment of receipt will be provided to the complainant within a period of ten working days after receipt of the complaint, unless the response itself is provided to the complainant within this period, indicating the name and contact details (telephone, email, etc.) of the person handling the complaint (Compliance Officer).

All complaints submitted in writing to AISM S.A. are recorded in a dedicated file and kept for the period provided for by legal provisions in force.

AISM S.A. is committed to handle each complaint diligently, transparently and objectively, aiming at gathering and investigating all relevant evidence and information concerning the complaint. In addition, AISM S.A. seeks to communicate in a plain and easily comprehensible language with the claimant as well as to provide an answer without undue delay and in any case, within a period of one month from the date of receipt of the complaint.

If no response can be provided to the claimant within the aforementioned deadline due to the nature or complexity of the claim, the person in charge of the complaint will inform the complainant, indicating the reasons for the delay and indicating a deadline forecast for processing the request.

In the case the complainant cannot be provided with an answer or a satisfactory answer at the level at which he/she submitted his/her complaint in the first instance, he/she has the possibility to rise the complaint up to the level of the management of AISM S.A. by contacting :

Person responsible of complaint handling at Senior management level :

DECALF Vincent

21, Rue Aldringen

L-1118 Luxembourg

Email : [vincent@decalf.lu](mailto:vincent@decalf.lu)

**Out-of-court complaint resolution at the *Commission de Surveillance du Secteur Financier (CSSF)* level**

When the complainant states that the answer to his written complaint given by the person responsible for handling complaints at the Senior Management level of AISM SA is not satisfactory, AISM S.A. must provide him/her with a full explanation of its position regarding the complaint and inform the complainant, on paper or by way of another durable medium, about the existence of the out-of-court complaint resolution procedure at the CSSF, by communicating its contact details :

**Commission de Surveillance du Secteur Financier (CSSF)**

**Département Juridique – Service JUR - CC**

283, Route d'Arlon L - 1150 Luxembourg

LUXEMBOURG

Fax : (+352) 26 25 1 – 2601

reclamation@cssf.lu

CSSF website : <http://www.cssf.lu/en/consumer/complaints/> where the complainant can find useful information concerning the out-of-court complaint resolution procedure before the CSSF.