

Customer Complaints Handling

Transmitter, person in charge of the updates	Compliance Officer	
Purpose	a) Efficient management of Complaints B) Compliance with local regulatory requirements <i>(- BoG Governor's Act 2501/31.10.2002 - disclosure obligations to customers with respect to terms and conditions governing the provision of financial services, - Regulation 2016/679 of the European Union - General Data Protection Regulation)</i>	
Field of application	Hellas Capital Leasing S.A.	
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In General

A complaint is any verbal or written expression of disagreement or dissatisfaction by a customer or by a 3rd party (supplier, partner etc) regarding a service or product offered.

Hellas Capital Leasing S.A. implements a sound, effective and efficient procedure for managing customer complaints, in view of the high level of reputational risk inherent in a reply that is inappropriate or not addressed promptly and taking into account the possible legal or compliance consequences.

The purpose of this procedure is:

- To establish, implement and maintain effective and transparent procedure for the reasonable and prompt handling of complaints received and of the measures taken for the resolution.
- To examine and resolve customer complaints and settle the differences with the least possible discomfort of all the parts involved.
- To analyse the problems encountered, to identify the causes and to report any customer suggestions regarding the improvement of the services and the products offered.

This procedure will be reviewed and updated on regular basis, by Compliance Department in order to be in compliance with the regulatory framework and to ensure transparency and high level of customer or 3rd parties' satisfaction.

Submission of the Complaints

A complaint may be submitted:

1. IN WRITTEN FORM

- By filling the CUSTOMER COMPLAINT FORM (Form No 1). The form is uploaded on the Company's internet site under section: "Contact us"
- By sending a letter to the Company's postal address (Hellas Capital Leasing S.A., Panepistimiou 39, 105 64 Athens, Greece), indicating your contact details, so that we can provide follow-up

- By fax to the Company's fax number: 210-6773398• By sending an e-mail – the Company's generic mailbox is: info@hc-leasing.gr .

2. VERBALLY

With regard to verbal complaints, these should not include any kind of trivial queries or sign of disturbance from the client on matters of day-to-day cooperation. Only strong verbal disputes should be included in the definition of a verbal complaint.

Verbal complaints can be made either over the phone (tel no: 210-6783000), either during a face to face meeting. In case that the issue could not be resolved, the employee contacted should ask the customer whether he wishes to record a verbal complaint. In affirmative, the employee should fill in the CUSTOMER VERBAL COMPLAINT FORM (Form No 2), after duly notifying the complainant about the process to be followed and giving information on the processing of his personal data, as described below in detail.

Any correspondence and communication with customers who are in a litigation process or any correspondence received via a court bailiff is handled by Legal Department and falls outside the scope of the Complaints management process.

Management of Complaints

Complaints must be analyzed as soon as possible. To secure the proper management of such issues and ensure their correct and timely treatment, the following steps should be applied.

1. Complaints can be received through different channels (electronically through e-mail, fax, hard copy) and in different forms (Word document, PDF files or hardcopies). Complaints may also be directly received by members of staff from various Units/Departments. In all cases, Complaints must be immediately forwarded to the Compliance Department, after they have been given a protocol number.

As a matter of general rule set to secure the Management of Complaints, any Complaint **MUST BE** in all cases, immediately communicated to the Compliance which in turn, is responsible for ensuring their centralization and for organizing the relevant actions to be taken internally according to this Procedure described below.

2. The Compliance department keeps a detailed record of such incidents via a Complaints Register (e.g. complaints over pricing, payments settlement etc) reported by any recipient of customer complaint. Recording refers to the following details:

1. Date the complaint file was filed
 2. Complainant's name
 3. Nature of the incident
 4. Date of reply
 5. Status: Open/ Resolved
 6. Other notes (if applicable) & short description
3. Compliance Officer after recording the incident calls for a meeting, where the following functions participate:
1. Legal
 2. Risk & Permanent Control
 3. Compliance and
 4. Any other involved function

The analysis of a complaint has as main purpose:

1. To define the degree of severity
2. To gather all information/data required for preparing the Company's reply

The meeting ends up to an action plan specifying the nature of the actions to be taken, who shall be responsible for taking them, as well as their respective schedules of implementation.

4. A reply to the customer complaints is expected to be submitted with 10 working days from the date of receiving the complaint
5. A copy of the reply is also submitted to the Compliance Officer for purposes of updating the record monitor and for following-up on various actions decided, as well as for maintaining a progress status report of the respective Action Plans established.
6. In case the Company does not respond to the complainant , rejects the complaint or in case the complainant is not satisfied with the resolution of his complaint, he has the right to address his complaint to the Hellenic Ombudsman for Banking-Investment Services (<http://hobis.gr/>). In all cases, the complainant reserves the right to file a lawsuit at any stage of the complaint.

Controls and Reporting

Hellas Capital Leasing S.A. has adopted a specific 2nd level control, in order to obtain assurance that customer complaints are processed in accordance with procedures defined herewith. Controls of this level are formalized and executed on a specified frequency by Risk and Permanent Controls staff and contain a broader, cross-departmental scope of areas of activity, as described in the internal procedure on: "Risk Mapping, Permanent Control Framework. Operational Risk Management and Reporting".

Local Regulatory Reporting

Hellas Capital Leasing S.A., complying with the provisions and requirements of Bank of Greece (Governor's Act 2501/31.10.2002), submits the following reports to the Bank of Greece:

1. Annual report on the implementation of requirements of Bank of Greece Governor's Act 2501/31.10.2002 – Chapter Z -> By 31 January each year
2. Annual report in BSD22 format regarding written and verbal complaints received by the Company during the previous year -> by 28 February each year

Information about personal data

INTRODUCTION

With the following notice, our Company, having its registered seat at 39 Panepistimiou str. in Athens and acting as the controller of your personal data, intends to provide information on personal data collected in the context of the customer complaints handling process. This information refers to the nature of personal data, the means and purposes of collection, any third parties with which this data is being shared, as well as the rights that you have, according to Regulation 2016/679 of the European Union [General Data Protection Regulation].

WHICH PERSONAL DATA WE COLLECT

The authorized and especially trained employees of Hellas Capital Leasing S.A. are responsible for the collection and other processing of personal data obtained under the customer complaints procedure. Such information can be derived from any electronic or hard copy documents received in the context of customer complaints (e.g. e-mails, forms, contracts and other supporting documents).

WHY WE COLLECT IT

The information and personal data in the context of customer complaints is collected in the legitimate interests of the Company to effectively assess and treat complaints and in order to comply with the Company's regulatory obligations, as prescribed by the Bank of Greece (Governor's Decision 2501/31.10.2002).

WITH WHOM WE SHARE IT

Personal data that is being processed in the context of customer complaints is not disclosed or transmitted to third parties. Exceptionally, such personal data is disclosed and/or transmitted

where applicable legislation so requires (e.g. to the Bank of Greece or the Ombudsman for Banking-Investment Services) and in view of pursuing or responding to legal claims.

HOW LONG WE KEEP IT

All records and personal data related to customer complaints are kept for 5 years after the final resolution of the customer complaint. After the said period, the information received is safely erased and destroyed, according to the applicable Company's Policies. For more information on these policies you can contact our privacy team responsible for communication regarding data protection issues (see contact information below).

OUR COMMITMENTS

Hellas Capital Leasing complies with its obligations under the General Data Protection Regulation by keeping personal data accurate and up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorized access and disclosure; by ensuring that appropriate technical and organizational measures are in place to protect personal data.

YOUR RIGHTS

The complainant has the following rights, which can be exercised at any time, by addressing a request to our Company, without charge:

- 1) Right of Access: you can request information on your personal data that is being held by our Company;
- 2) Right to Rectification: you can request the rectification of inaccurate personal data or the completion of incomplete personal data;
- 3) Right to Erasure: you can request the erasure of your personal data, where this data is no longer necessary for the purposes for which it was collected and processed provided that we are not obliged to retain your data by any other legal or regulatory obligation;
- 4) Right to Restriction: you can request the restriction of any processing of your personal data, where there is a dispute in relation to their accuracy or processing;
- 5) Right to Object: you can object to the disclosure of your personal data (i.e. contact details) to the employee complained against, by putting forward reasonable explanations overriding the legitimate interests of that person.

If a complaint is submitted against an employee of Hellas Capital Leasing, the employee has the right of access to the contents of such a complaint, as well as to the information about the complainant (e.g. his name and address). The employee also has the right to rectification, erasure, restriction or to object, as described above.

In case you exercise the rights of rectification, erasure or restriction of your personal data, these requests will be communicated to any third party recipients to whom this data has been disclosed in the context of customer complaints.

CONTACT INFORMATION

Any request regarding the processing of your personal data in the context of customer complaints, should be addressed to the team responsible for communication regarding data protection issues of our Company, using the following contact details:

Name: Athanassia Rerre, Legal Advisor

Email :a.erre@hc-leasing.gr

Postal address: Panepistimiou 39, 105 64 Athens, Greece

Phone number: 210-6783173

Name: Vassiliki Mirayia, Compliance Officer

Email :v.moiragia@hc-leasing.gr

Postal address: Panepistimiou 39, 105 64 Athens, Greece

Phone number: 210-6783138

Name: Konstantinos Kefalas, IT Manager

Email :k.kefalas@hc-leasing.gr

Postal address: Panepistimiou 39, 105 64 Athens, Greece

Phone number: 210-6783151

In case you feel that the protection of your personal data is violated in any way whatsoever, you can lodge a complaint with the Hellenic Data Protection Authority, using the following contact details:

Website: www.dpa.gr

Postal Address: 1-3 Kifissias Ave., 115 23 Athens, Greece

Call Center: +30 210 6475600

Fax: +30 210 6475628

E-mail: contact@dpa.gr

ΕΝΤΥΠΟ ΥΠΟΒΟΛΗΣ ΠΑΡΑΠΟΝΩΝ ΠΕΛΑΤΕΙΑΣ

Παρακαλούμε συμπληρώστε αυτή τη φόρμα. Αν συναντήσετε δυσκολία στη συμπλήρωση της καλέστε μας στο 2106783000

Στοιχεία Πελάτη	
*Επίθετο:	
*Όνομα:	
*ΑΔΤ¹	
Δ/νση (αριθ/οδός/περιοχή/ πόλη/ τκ)	
*Τηλέφωνο επικοινων:	
Κινητό Τηλεφωνο:	
Fax :	
E- mail:	
*Αν είστε εκπρόσωπος εταιρίας παρακαλώ συμπληρώστε την επωνυμία της & το ΑΦΜ της και τη θέση σας αυτή:	

Τα πεδία με * είναι υποχρεωτικά

ΠΕΡΙΓΡΑΦΗ ΠΡΟΒΛΗΜΑΤΟΣ

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Παρακαλούμε να αναφέρετε κάθε σχετικό έγγραφο, το οποίο πρόκειται να επισυνάψετε:

- 1).....
- 2).....

Δηλώνουμε υπεύθυνα, γνωρίζοντας τις συνέπειες του νόμου για ψευδή δήλωση, ότι όλα τα στοιχεία που αναγράφονται στην παρούσα αίτηση είναι πλήρη και ακριβή και η HELLAS CAPITAL LEASING AE έχει το δικαίωμα να τα εξακριβώσει κατά την κρίση της .

Τόπος & Ημερομηνία.....

Υπογραφή

ΕΝΤΥΠΟ ΠΡΟΦΟΡΙΚΩΝ ΠΑΡΑΠΟΝΩΝ ΠΕΛΑΤΕΙΑΣ

(συμπληρώνετε από τον υπάλληλο της Hellas Capital Leasing)

<i>Τηλεφωνική κλήση</i>	ΝΑΙ <input type="checkbox"/> ΟΧΙ <input type="checkbox"/>	<i>Ημερομηνία</i>	/ /
<i>Επίσκεψη</i>	ΝΑΙ <input type="checkbox"/> ΟΧΙ <input type="checkbox"/>	<i>Αρ. Πρωτοκόλου</i>	

Στοιχεία Πελάτη	
*Επίθετο:	
*Όνομα:	
*ΑΔΤ ²	
Δ/νση (αριθ/οδός/περιοχή/ πόλη/ τκ)	
*Τηλέφωνο επικοινωνίας:	
Κινητό Τηλεφωνο:	
Fax :	
E- mail:	
*Αν είστε εκπρόσωπος εταιρίας παρακαλώ συμπληρώστε την επωνυμία της & το ΑΦΜ της & τη θέση σας σε αυτή:	

ΠΕΡΙΓΡΑΦΗ ΘΕΜΑΤΟΣ

ΑΙΤΗΜΑ ΠΕΛΑΤΗ

ΕΝΕΡΓΕΙΕΣ

.....

Όνομ/μο Υπαλλήλου : _____

Υπογραφή: _____

Έντυπο Νο II

² Απαραίτητο προκειμένου να πραγματοποιηθεί η απαιτούμενη ταυτοποίηση



CUSTOMER COMPLAINT FORM

Please use this form. If you have any difficulties filling in this form just phone us on +302106783000.

Customer Details	
*Surname:	
*First Name:	
*ID/ PASSPORT NUMBER ³	
Address (Number-Street-Area-City-Zip Code):	
*Contact phone:	
Mobile phone:	
Fax :	
E- mail:	
*If you are complaining representing a Company: please fill in the Company's name, Tax registration number & your position :	

* Obligatory fields

Description of the Complaint

Please write down any relevant documents that you enclose:

- 1).....
- 2).....

³ For identification purposes



I hereby solemnly declare knowing the consequences of the law of misrepresentation, that all information given in this form is complete and accurate and HELLAS CAPITAL LEASING SA has the right to verify them at its discretion.

Place.....

Date.....

Signature

Form No1



CUSTOMER VERBAL COMPLAINT FORM

(Completed by Hellas Capital Leasing SA Employees)

<i>Phone call</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>	<i>Date</i>	/ /
<i>Face to face visit</i>	YES <input type="checkbox"/>	NO <input type="checkbox"/>	<i>Protocol No</i>	

Customer Details	
*Surname:	
*First Name:	
*ID/ PASSPORT NUMBER¹	
Address (Number-Street-Area-City-Zip Code):	
*Contact phone:	
Mobile phone:	
Fax :	
E- mail:	
* If you are complaining representing a Company: please fill in the Company's name, Tax registration number & your position ::	

Description of the Complaint

Customer Request

¹¹ For identification purposes



ACTIONS TAKEN OR NEED TO BE TAKEN

.....

.....

.....

.....

Employee Name/Surname : _____

Signature: _____

Form No2