



**COMPLAINT HANDLING
POLICY**

CREDITFORTE KFT.

Ágnes Balázs
Managing Director

1. **Introductory provisions**

In order to handle the complaints made by clients efficiently, transparently and rapidly, Creditforte Kft. – hereinafter called: Creditforte or the Company - (seat: 1118 Budapest Gombocz Z.u.14. Cg.:01-09-345193, VAT No.: 14656257-2-43, represented by: Ágnes BALÁZS, with individual signatory powers) has drafted the present Complaint Handling Policy and acts accordingly. The fundamental goal of this internal regulation is that those who get in contact with Creditforte should be satisfied with the services of the Company but they could also notify us of their remarks, advices to make our processes better or even, if they have, complaints, in the manner as the act and the various statutory provisions define.

The activities of Creditforte Kft. are restricted exclusively to debt management based on assignment.

Approved:	Ágnes Balázs, Managing Director
Date of coming into force:	25 04 2018
Last amended:	30 06 2020
Revision:	annually
Statutory provisions mentioned in the Complaint Handling Policy:	

- Act CCXXXVII/2013 on Credit Institutions and Financial Enterprises
- Government Decree 435/2016 (XII.16) on the Detailed Rules of the Complaint Handling Regulations of Investment Enterprises, Financial Institutions, Issuers of Electronic Money, Vouchers, Independent Intermediaries of Financial Services
- Decree 28/2014 (VII.23) of the President of the National Bank of Hungary
- Act CLV/1997 on Consumer Protection
- Act CXII/2011 on Information Self-Determination and the Freedom of Information
- Government Decree No. 387/2016 (XII.2) on the Appointment of Consumer Protection Authority

Editor:	Balázs Tóth, Data Protection Officer
Approved:	Ágnes BALÁZS, Managing Director
List of Amendments:	Annex 1

Creditforte Kft. examines and manages (resolves) the complaints submitted to it according to Act CCXXXVII/2013 on Credit Institutions and Financial Enterprises, Government Decree 435/2016 (XII.16) on the Detailed Rules of the Complaint Handling Regulations of Investment Enterprises, Financial Institutions, Issuers of Electronic Money, Vouchers, Independent Intermediaries of Financial Services, Decree 28/2014 (VII.23) of the President of the National Bank of Hungary, Act CLV/1997 on Consumer Protection, Act CXII/2011 on Information Self-Determination and the Freedom of Information, Government Decree No. 387/2016 (XII.2) on the Appointment of Consumer Protection Authority.

2. **Scope**

The Complaint Handling Policy, i.e., this Policy, covers all the employees and clients of the Company. It shall come into force from the date appearing thereon and remains valid for an indefinite term. With its entry into force all former policies upon the same subject shall lose force.

3. **Revision, accessibility of the Policy**

The present Policy is approved by the managing director of Creditforte and is kept by the Complaint Handling Team. The Policy is revised (approved) once a year. The amendments, if any, are shown in the List of Amendments in Annex No 1. The Policy is accessible for the employees through the Knowledge base/policies window, and in hard copy at the Complaint Handling Team, in the premises where clients are received and also on our website:

www.creditforte.hu

4. Responsibility

The senior management shall be liable for the strict observance of the present Policy. Employees, however, shall be also obliged to report, if any fact or circumstance comes to their knowledge, that results from or suggest evasion or breach of the present Policy.

5. Definitions

Complaint: Creditforte shall consider as complaint all objections which the Client or his/her representative sends to the Company in any form defined in the Policy. It shall, however, not classify as a complaint, if the Client asks from the Company general information or a position, opinion or certificate.

Client: the legal entities, business companies or organizations without having legal personalities, private persons and their representatives with which or whom Creditforte has or had contact. If it is the representative or proxy of the client who files the complaint, then the Company shall first check whether this person is entitled or not to file complaints by ascertaining his/her identity by the help of identity documents or data suitable for identification and the relevant power-of-attorney.

6. How to file a complaint?

Complaints:

- **Verbally:** personally, after having made an appointment, at the place designated for handling complaints, i.e., under the address 1118 Budapest, Gombocz Z. u. 14. , on weekdays from 08:00 a.m. to 05:00 p.m.
- **by phone:** by phone No. + 36 1 5100 832 on weekdays from 08:00 a.m. to 05:00 p.m.

Written complaints:

- **Personally, or in writing** at, or sent to the address given hereunder
- **Mailing address:** Creditforte Kft.
- **E-mail:** panaszkezeles@creditforte.hu (without time limit)

Written complaints can be filed also using the template published on the website of the National Bank of Hungary: <https://www.mnb.hu/fogyasztovedelem/penzugyi-panasz#formanyomtatvanyok>. The template is accessible also on the www.creditforte.hu website. At your request we shall send you the forms helping in filing your complaint.

7. Contents of the complaint, data that may be requested for complaint handling and data protection

In connection with the handling of complaints the Company may ask the client to furnish the following data:

- name
- contract number, client identifier
- postal address for the mailing of notices
- telephone number, e-mail address
- manner of notification
- name of the organization subject to the complaint
- description of and reason for the complaint
- claim of the Client
- duplicate copies of the documents the Client has in his/her possession to support his/her complaint
- if the client is represented by a proxy, then a valid power-of-attorney issued to this person.

If the client acts through a representative, then the latter's authorization shall be laid down in the form of a public document or a private deed of full conclusive force and an original or a certified true copy thereof shall be enclosed to the complaint.

Creditforte Kft. shall control the data of the complainant in conformity with the provisions of Act CXII/2011 on Information Self-Determination and the Freedom of Information.

8. Investigating complaints

General rules

The investigation of complaints is free of charge, no fee whatsoever can be charged for it. Complaints shall be investigated with all relevant circumstances taken into account and based on the documents in possession of the Company and the ones submitted by the client. The aim of the complaint handling procedure is to avoid litigation.

In the course of the investigation of the complaint the Company shall examine whether the complaint was filed or not by a person authorized to do so, if the notification submitted qualifies as a complaint or is a general request for information, a leniency application etc. and if the Client gave all the data inevitable for investigating into the case.

If the Client submits a complaint in connection with a specific contract that has been answered already by the Company (i.e., the contents of the complaints in connection with that and the same contract are identical), then, within the 30 days term afforded for replies the Company shall inform the Complainant that the Company maintains its former decision.

Verbal complaints:

If possible, Creditforte Kft. shall examine verbal complaints immediately and, if necessary, remedy them. In case of verbal complaints by phone, if live contacts with the clerk of the customer service could be established, then within 5 (five) minutes after the successful incoming call the Company shall act as it can be expected under the premises. The Company shall make audio recordings of the complaints made by the help of the phone number shown in the Complaint Handling Policy and shall keep these for the period shown in the Policy, i.e., for 5 years. At the request of the Client the Company shall provide for the Client the possibility to listen to the audio recording, and for no charge, it shall place at the Client's disposal within 25 (twenty-five) days the attested typed version or a duplicate copy of the recording.

If the Client disagrees with the handling of the complaint made verbally, or if the immediate investigation of the complaint is not possible, then the Company shall draw minutes of the complaint and its position in connection with it. The Client present shall sign the minutes to certify that the contents truly reflect what have been told. If the complaint is communicated in person, then the Company shall hand over to the complainant a duplicate copy of the minutes; in case of complaints made by phone, it shall send the minutes within 30 (thirty calendar days together with the Company's reasoned response. if, according to any specific statutory provision the Company must respond within a shorter period of time, then the Company shall send its answer within the time limit allowed by the statutory provision in question.

The minutes drawn up of the complaint shall contain the following data:

- name of Client
- notification address and seat of the Client
- place, date and manner of filing the complaint
- detailed description of the Client's complaint (with every objected point being discussed separately)
- number of the contract in connection with which the complaint is being made and the case identifier
- list of the documents presented by the Client
- if the complaint cannot be investigated immediately then, with the exception of verbal complaints made by phone, the signatures of the person drawing up the minutes and also of the client

- place and date of drawing up the minutes
- name and address of the services provider being subject of the complaint

Written complaint

Creditforte Kft. shall send its decision with the reasons regarding written complaints within 30 (thirty) calendar days to the client, unless some specific statutory provision prescribes a shorter term in which case the Company shall send its response within the shorter term prescribed.

9. **Obligation to inform, legal remedy:**

Creditforte Kft. wants to solve complaints in a way satisfactory for both parties, with all circumstances and positions being considered. If, however, our Company rejects the complaint or no answer is sent within the 30 (thirty) days' term prescribed by law, the Client is entitled to ask from the following organizations assistance, of which fact the Client shall also be informed in the Company's response.

9.1. **Clients classifying as consumers:**

9.1.1. **In case of complaints arising from legal relations based on financial services:**

Financial Conciliation Board (Pénzügyi Békéltető Testület): (for legal disputes touching the existence, validity, expiry and termination of contracts and their legal consequences)

Mailing address: HU-1525 Budapest BKKP Pf.:172
Telephone number: 0680203776
E-mail: ugyfelszolgalat@mnbb.hu
Download link: <https://www.mnbb.hu/fogyasztovedelem/panaszom-van/formanyomtatvanyok>

The National Bank of Hungary, Financial Consumer Protection Centre (Magyar Nemzeti Bank Pénzügyi Fogyasztóvédelmi Központ)

Mailing address: HU-1534 Budapest BKKP Pf.:177
Telephone number: 0680203776
E-mail: ugyfelszolgalat@mnbb.hu
Download link: <https://www.mnbb.hu/fogyasztovedelem/panaszom-van/formanyomtatvanyok>

and the territorially competent courts

9.1.2. **In case of complaints resulting from other than legal relations based on financial services:**

Territorially competent district offices

In the letter rejecting the complaint our Company shall inform the complainant on which district office is competent for judging his/her case based on the complainant address known to us, and what are its access data.

The territorially competent district office can also be found on this link: <https://jarasinfo.gov.hu/>

In cases judged by the district offices as proceeding authorities of 1st instance, the **Pest County Government Office (Pest Megyei Kormányhivatal)**

Mailing address: 1052 Budapest, Városház u. 7.
Telephone number: 0613285814, 0614856957
E-mail: pest@pest.gov.hu shall proceed.

Conciliation boards

The list of territorially competent conciliation boards can be downloaded from here, <http://www.bekeltetes.hu/index.php?id=testuletek>

or from the website of Creditforte Kft.. In its response rejecting the complaint the Company shall inform the complainant on that based on his/her address known by us, which conciliation board is competent to judge his/her case and what are its access data.

In addition to the above, when the legal disputes fall under the effect of the Civil Code, the Client can submit the case also to the **court having jurisdiction**.

9.2. Clients not classifying as consumers

Clients not classifying consumers can turn to the court having jurisdiction.

Our Company shall respond to the complaint according to the nature of the complaint and in its response it shall inform the Client on the possible legal remedies (to which organization it can apply for remedy)-

With respect to complaints relying on legal relation entered into for financial services: if the complaint is rejected or the 30 days' term prescribed for responding elapses without result, then the client classifying as consumer shall be notified of the fact that he/she can ask for the application form to be used for initiating a revision of the case at the Financial Conciliation Board (Pénzügyi Békéltető Testület) or the Financial Consumer Protection Centre (Pénzügyi Fogyasztóvédelmi Központ), or if to obtain the forms would otherwise be problematic for the Client, then at the contact addresses of the Company (1506 Budapest, Pf.: 74.), free of charge.

10. Records of complaints

The Company keeps records of the complaints and the measures taken for resolving them.

The records shall contain the following:

- description of the complaint and the event or fact serving as its basis
- date of filing of the complaint
- description of the measures taken with a view to conciliate or resolve the complaint, or if the complaint was rejected then the reasons therefor
- the term set for implementing the measure or the name and organizational unit of the person responsible for implementation
- date of dispatch of the letter responding to the complaint.

The Company keeps the records of the complaints and its responses to them for a period of 5 (five) years.

I ask you to kindly investigate into my above complaint.

Please, send me your finding as follows:

1. . by e-mail, to the following address:

2. . by e-mail, to the following address:

Budapest, ____/____/____

signature by the complainant*

**signature of the person who has taken the
complaint as representative of Creditforte Kft.**

* by signing the present form the complainant confirms that the data set down in the minutes are true to the reality and if the complaint was made in person, then he/she was given one copy of the minutes of the complaint.

I hereby inform you that in case of a breach of the consumer protection regulations of Act CXXXIX/2013 on the National Bank of Hungary, you can initiate a consumer protection procedure at the National Bank of Hungary exercising its supervisory power with respect to the financial intermediary system; in case of disputes touching the existence, validity, legal effects of the contract you can turn to courts or initiate a procedure to be carried by the Financial Conciliation Board (Pénzügyi Békéltető Testület), if, according to the procedural rules of the Financial Conciliation Board if you classify as a consumer. Creditforte Kft. made no general submission statement.

Insofar as your complaint is rejected by our company or if you receive no answer within the 30 (thirty) days prescribed for investigating complaints, you are entitled to turn to the following bodies and organizations:

The National Bank of Hungary - Financial Consumer Protection Centre:

Address: 1013 Budapest, Krisztina krt. 39.
Mailing address: 1534 Budapest BKKP Pf.: 777.
Telephone: 06 80 203 776
E-mail: ugyfelszolgalat@mnb.hu
Website: www.mnb.hu/fogyasztovedelem

Financial Conciliation Board - Pénzügyi Békéltető Testület:

Address: Magyar Nemzeti Bank, 1850 Budapest
Telephone: 06 80 203 776
E-mail: ugyfelszolgalat@mnb.hu
Website: www.mnb.hu/bekeltetes

The forms used by the financial Conciliation Board (Pénzügyi Békéltető Testület) can be downloaded from here:

<https://www.mnb.hu/bekeltetes/kerelem-es-egyeb-nyomtatvanyok/kerelem-nyomtatvany>

Further forms for filing complaints:

<https://www.mnb.hu/fogyasztovedelem/panaszomvan/formanyomtatvanyok>

These forms are available also in our bureau and at the contact addresses shown in the heading you can ask for sending them to you free of charge.