

Operating regulations for complaints management

1. Introduction and Definitions

1.1. Introduction

In accordance with the legal and regulatory framework in force, namely article 157 of the Legal Framework for Access to and Exercise of the Insurance and Reinsurance Activity, approved by Law no. 147/2015, of September 9, and Regulatory Standard no. 7/2022-R, of June 7, COSEC maintains internal regulations aimed at operationally responding to the legal and regulatory requirements of Complaints Management.º 7/2022-R of June 7, COSEC maintains internal regulations aimed at operationalizing the response to the legal and regulatory requirements established in terms of Complaints Management, ensuring the collection, processing and analysis of data relating to the management of these complaints, both for reporting purposes and for consideration in COSEC's operational activity.

The purpose of these Regulations for the Management of Customer Complaints is to disclose the organizational model adopted by COSEC for the management of complaints, including the applicable internal procedures and circuits, the contact details for the purpose of submitting and monitoring complaints, as well as the applicable deadlines.

1.2. Definitions

Within the scope of complaints management and under the terms of the regulations in force, the following definitions are considered:

"Clients" means policyholders, insured persons, beneficiaries and injured third parties, within the scope of the insurance business, including assignees of the right to compensation and risk entities.

"Complaint" a statement of disagreement with the position taken by an insurance company or of dissatisfaction with the services it provides, as well as any allegation of possible non-compliance, submitted by customers and received through the reception points of the Complaints Management System or the Complaints Books.

The concept of complaint does not include statements that are part of the contractual negotiation process, requests to comply with legal or contractual obligations, communications inherent to the claims settlement process or any requests for information or clarification.

"Complaints Management System - SGR" organizational model adopted by COSEC to set up the autonomous function responsible for Complaints Management and Handling.

2. General principles applicable to complaint management

COSEC manages the processes relating to complaints submitted through the Complaints Management System, which, under the terms of the regulations in force, ensures the attributions of the Autonomous Function Responsible for Complaints Management, acting as a centralized point for receiving and responding to complaints and communications with complainants.

The management of complaints does not entail any costs or burdens for the complainant, nor any burdens that are not necessary for the fulfillment of this function and is carried out by suitable employees with appropriate professional qualifications.

COSEC - Companhia de Seguro de
Créditos, S.A.

Customer Service:
Info.pt@allianz-trade.pt
Tel. +351 211 164 221

VAT Number and Register Number at Lisbon
Commercial Registry Office 500726000.
Share Capital: 7,500,000 EUR

Head office: Avenida da Liberdade 249, 6º piso, Oporto office: R. Gonçalo Sampaio, 329,
1250-143 Lisbon

3º piso, 4150-367 Oporto

www.allianz-trade.pt

COSEC's Complaints Management System ensures that situations which could give rise to conflicts of interest are properly prevented, identified and managed. The cooperation of the departments involved is ensured in providing the information necessary to carry out the complaints management function.

COSEC's handling of complaints is without prejudice to the right of recourse to the courts or out-of-court dispute resolution mechanisms.

Complaints management data is analyzed and processed with a view to detecting and correcting any recurring problems and safeguarding any legal or operational risks, identifying common causes of certain types of complaints and assessing whether these causes are likely to affect other processes.

COSEC's Complaints Management System includes complaints made in Complaints Books in physical and electronic format, under the terms set out in the law and respective regulations.

Under the terms of the applicable regulations, COSEC has appointed a Customer Ombudsman with whom it has a duty to cooperate.

3. Handling Complaints under the Complaints Management System

A - Complaints reception point

COMPLAINTS MANAGEMENT SYSTEM
Marketing and Communications Department
COSEC - Companhia de Seguro de Créditos, SA

B - Complaints response point

COMPLAINTS MANAGEMENT SYSTEM
Marketing and Communications Department
COSEC - Companhia de Seguro de Créditos, SA

C - Minimum requirements for complaints

Bearing in mind the definition of complaint in point 1.2 above, as well as the provisions of article 11 of Regulatory Standard no. 7/2022-R of June 7, only complete complaints submitted at the defined **reception point** and which are not rejected outright are dealt with under the Complaints Management System.

1 - Shape

Complaints must be made in **writing**, by **e-mail** to the address reclamacoes@allianz-trade.pt, in the **Physical or Electronic Complaints Books** or by **letter addressed to the attention of the COMPLAINTS MANAGEMENT SYSTEM** to the address Av. da Liberdade, n.º 249, 6.º Piso, 1250-143 Lisboa..

2 - Content

Complaints must contain the relevant information for their management, including at least:

- a) Full name of the complainant and, particularly when the complainant is a legal person, of the person representing them and the capacity in which they act;
- b) Reference to the quality of the claimant (policyholder, insured, beneficiary, risk entity or interested third party);
- c) Contact details of the complainant and, if applicable, the person representing them;
- d) Claimant's identification document number;
- e) A description of the facts that gave rise to the complaint, identifying those involved and the date on which the facts occurred, unless this is manifestly impossible;
- f) Date and place of complaint.

If one of the elements listed is missing, the RMS will send a communication to the complainant informing them of the absence and inviting them to complete the complaint, informing them that the respective processing will only begin if and when the missing elements are included.

Complaints will be rejected outright if:

COSEC - Companhia de Seguro de
Créditos, S.A.

Customer Service:
Info.pt@allianz-trade.pt
Tel. +351 211 164 221

VAT Number and Register Number at Lisbon
Commercial Registry Office 500726000.
Share Capital: 7,500,000 EUR

Head office: Avenida da Liberdade 249, 6º piso, Oporto office: R. Gonçalo Sampaio, 329,
1250-143 Lisbon

3º piso, 4150-367 Oporto

www.allianz-trade.pt

- a) Essential data is omitted which makes the respective management unfeasible and which has not been corrected within 20 working days of the communication to that effect;
- b) If you intend to file a complaint regarding a matter that falls within the exclusive jurisdiction of arbitration or judicial courts or when the matter that is the subject of the complaint is pending or has already been decided by those bodies;
- c) Repeat claims that have been submitted by the same claimant in relation to the same issue and which have already been answered by the insurance company;
- d) The complaint was not made in good faith or its content is qualified as vexatious.

3 - Costs

No amounts are owed by complainants to COSEC as a result of the handling of complaints.

D - Contacts for submitting and following up complaints

By Letter

Complaints management system

COSEC - Companhia de 1seguro de Crédito, S.A.
Av. da Liberdade, n.º 249, 6th floor

Email

reclamacoes@allianz-trade.pt

E - Deadlines

To be observed by COSEC

Up to 5 working days from the date of receipt of the complete complaint to:

- Acknowledge receipt of the complaint;
- Do not admit the complaint;
- Invite to make up for an omission.

20 working days from the date of receipt of the complete complaint to:

- Reply on the outcome of the complaint.

Communications are made on a durable medium, preferably using electronic documents and e-mail.

To be noted by the complainant

20 working days from the date of communication to that effect

- To correct essential data to make complaint management possible.

Shelf life

Complaints and all related documentation are kept for a period of 5 (five) years from the date of receipt and, regardless of this period, during the pendency of any associated legal proceedings.

F - Internal procedures and circuits applicable to complaints management

- 1) Receipt of the "Complaint";
- 2) Recording, numbering and classifying the eligibility of the "Complaint";
- 3) Sending a communication to the complainant, acknowledging receipt of the "Complaint" and informing them that it will be processed, inviting them to complete the "Complaint" (if elements are missing) or rejecting the "Complaint" when it does not meet the conditions to be accepted;
- 4) Analysis and preparation of the response to the complaint, with the involvement of the department(s) responsible for the subject of the complaint;
- 5) Sending the reply to the complainant, taking into account the deadline set for this;

**COSEC - Companhia de Seguro de
Créditos, S.A.**

Customer Service:
Info.pt@allianz-trade.pt
Tel. +351 211 164 221

VAT Number and Register Number at Lisbon
Commercial Registry Office 500726000.
Share Capital: 7,500,000 EUR

Head office: Avenida da Liberdade 249, 6º piso, Oporto office: R. Gonçalo Sampaio, 329,
1250-143 Lisbon

3º piso, 4150-367 Oporto

www.allianz-trade.pt

- 6) Record of the response being sent;
- 7) Documentation archive.

G - Definition of the information that complainants can access and the respective conditions of access

Complainants can access the following information:

- Complaint received by COSEC;
- Date the complaint was received by the RMS;
- Other written communications made by the complainant to COSEC in connection with the handling of the complaint;
- Response to complaint;
- Other written communications sent by the RMS to the complainant in connection with the handling of the complaint.

The complainant can access the above information through the contacts indicated in Point D, identifying the complaint for which the information is requested.

If the complainant is a legal person, the communication must be signed by its legal representatives or by an attorney empowered to do so.

H - Appeals

If the response obtained through the Complaints Management System does not satisfy, from the complainant's point of view, the terms of the complaint lodged, the complainant may lodge a complaint with the Customer Ombudsman or the ASF.

I - Personal Data Protection

Personal data collected as part of the processing of complaints is processed in accordance with the provisions of the General Data Protection Regulation, approved by Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016. Consult COSEC's Privacy Policy [here](#).

**COSEC - Companhia de Seguro de
Créditos, S.A.**

Customer Service:
Info.pt@allianz-trade.pt
Tel. +351 211 164 221

VAT Number and Register Number at Lisbon
Commercial Registry Office 500726000.
Share Capital: 7,500,000 EUR

Head office: Avenida da Liberdade 249, 6º piso, Oporto office: R. Gonçalo Sampaio, 329,
1250-143 Lisbon

3º piso, 4150-367 Oporto

www.allianz-trade.pt