

CUSTOMER COMPLAINTS POLICY



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According to the article 16 Regulation N°16-07 related to out-of-court complaint resolutions (the "Regulation"), the financial sector professional shall have a complaint management policy. The Regulation is available on the website of the Commission du Surveillance du Secteur Financier (the "CSSF") <http://www.cssf.lu/>.

According to the Regulation, a complaint is "any complaint filed with a professional to recognise a right or to redress a harm".

This policy applies to all natural and legal persons of the professional.

1. Introduction of the complaint to the professional

The claimant may introduce a claim by two means:

- Either by email: legal@positivethinking.lu
- Or by letter with acknowledgement of receipt:

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Service juridique
1, rue du Fort Rheinsheim
L-2419 Luxembourg

For an efficient handling of the complaint, the complaint must include, as far as possible, information on the nature, the object, the context and the e-mail address or postal address allowing contact with the claimant.

2. Treatment of the complaint

2.1. Acknowledgment of receipt of the complaint

The complaint is received by the legal advisor of the professional who is responsible for acknowledging receipt, by email, of the request within ten working days from receipt of the complaint. If the email address of the claimant is not indicated in the form, the acknowledgement of receipt will be made by mail with acknowledgement of receipt.

The e-mail or acknowledgement letter shall give the claimant an estimated time for processing the complaint, which may not exceed one month. The claimant is informed of the contact details of the person in charge of the claim in the first place.

2.2. Assignment of the complaint and escalation procedure

The request is assigned to the person most likely to be able to meet it.

If the claimant has not received a satisfactory answer or response from that person in the first place, he has the possibility to escalate his request to one of the Directors of the professional whose contact is in the response of the person to whom the claim is assigned.



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