



## Information on the Complaint policy

### 1. Objectives of the complaint management

Complaint management aims to implement regulatory requirements for the organization of internal complaint processes. The objective is not only to ensure the necessary proper business organization as part of the complaint management process, but also to use the findings from customer complaints in particular to improve the proper business organization and thus achieve greater customer satisfaction.

Through constructive, transparent and efficient complaint processing, we ensure that customer satisfaction is restored and customer loyalty is strengthened. This principle follows the model below:

- Reliable registration and evaluation as well as immediate handling of complaints;
- Analysis of complaints regarding possible failings and inadequacies in business operations;
- Identification and elimination of risks and problems in current processes and products.

### 2. Functions of the complaint management

The complaint management

- is responsible for the proper recording, processing and response to complaints;
- takes the lead if various departments are involved in the processing of complaints;
- is responsible for internal reporting and reporting obligations to the CSSF.

### 3. What is a complaint?

A complaint in the supervisory sense is any complaint filed by a complainant with a financial services provider with the aim of establishing a right/claim or recognizing a claim for compensation. Simple requests for information or clarification, on the other hand, are not considered as complaints.

### 4. Filing a complaint

To simplify the submission, we provide a [complaint form](#). Please submit the complaint by mail or e-mail to our complaint management.

Postal address: **Hauck Aufhäuser Lampe Privatbank AG, Luxembourg Branch**  
Complaint Management  
1c, rue Gabriel Lippmann  
L-5365 Munsbach

E-mail: [BeschwerdenHAL@hal-privatbank.com](mailto:BeschwerdenHAL@hal-privatbank.com)

### 5. Complaint processing

All complaints submitted will be forwarded immediately to our complaint management, where they will be processed centrally:

#### **a. Acknowledgement of receipt**

An acknowledgement of receipt will be issued for all complaints as part of the complaint recording process and provided to the complainant in writing (by mail, fax or e-mail) within a period not to exceed ten (10) banking days from the date the complaint is received by complaint management, unless the complainant has already been provided with a response to his/her complaint within that time period.

#### **b. Interims notice**

If a complaint cannot be processed without delay, preferably within one month, the complainant will be informed of this in the acknowledgement receipt or in an interim notice with the reasons for the delay by mail, fax or e-mail. In addition, a date will be stated when the examination is expected to be completed. If the process is prolonged, the complainant will be informed on a regular basis.

#### **c. Response letter**

A response letter will be prepared for all complaints as part of the complaint process, reviewed by two staff members, signed, and then sent to the complainant by mail. The response letter is sent as soon as the complaint has been conclusively processed.

### **6. CSSF out-of-court complaint resolution procedure**

If the complaint process has not provided a satisfactory solution, we would like to draw your attention to the possibility of contacting the CSSF's Customer Complaints Board with your concerns. The CSSF will act as an intermediary in order to seek an amicable out-of-court settlement of the disputes between the complainant and the company.

A prerequisite for the opening of the out-of-court complaint resolution procedure before the CSSF is that you have submitted the complaint – as described above – to us. If you have not received a satisfactory solution from us within one month of sending your complaint, you can submit a request for out-of-court settlement of a complaint directly to the CSSF.

You can contact the CSSF either by mail (CSSF, Département Juridique CC, 283, route d'Arlon, L-2991 Luxembourg), fax (00352-26 25 1 2601) or by e-mail ([reclamation@cssf.lu](mailto:reclamation@cssf.lu)).

Further information can be found on the CSSF's website using the following link:

<https://www.cssf.lu/en/customer-complaints/>

Any further legal recourse to the civil courts remains unaffected.