



COMPLAINTS HANDLING POLICY

COMPLAINTS HANDLING POLICY

eFINNO is owned and operated by Streams Financial Services Limited (the Company), supervised and regulated by the Cyprus Securities and Exchange Commission (CySEC) with license number 376/19 and company registration number HE 387124, located at 284 Makarios Avenue, 4th Floor, 3105, Limassol, Cyprus.

We have adopted this Complaints Procedure in order to ensure a fair and quick process for handling complaints that may arise from our relationship.

“Complaint”- shall mean an expression of dissatisfaction by a Client or potential client regarding the provision of investment and/ or ancillary services provided to him/her by eFINNO. Only a duly completed, submitted Complaint Form accompanied by adequate supporting evidence (as necessary) will be recorded as a Complaint by the Company and will be handled as such.

1. Submitting your Complaint

You may submit your complaint in writing and addressed to the **Compliance Function** of the Company who is authorised to handle and investigate complaints that may be submitted to them.

Kindly complete the *Complaints Handling Form* available on efinno.com website under the Legal Documents section and submit it in any of the following ways:

- 1.1 By sending by post or delivering in person the *Complaints Handling Form* at the following address:
284 Makarios Avenue, 4th Floor, 3105, Limassol, Cyprus.
- 1.2 By submitting the *Complaints Handling Form* electronically at the following email addresses:
compliance@efinno.com.

2. Acknowledging your Complaint

Upon receipt of a duly completed Complaint Form, we will acknowledge receipt of your complaint within five (5) business days from the receipt of your complaint and provide you the unique reference number of your complaint. The unique reference number should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

3. Handling of your Complaint

Once we acknowledge receipt of your complaint we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay.

We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process will keep you updated of the handling process of your complaint. One of our officers may contact you directly (including communication by email or phone) in order to obtain further clarifications and information relating to your complaint. We will require your full cooperation in order to expedite the investigation and possible resolution of your complaint.

In the event that your complaint requires further investigation, and we cannot resolve it within two (2) months, we will issue a holding response in writing or other durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, we shall provide you with the outcome of our investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and your cooperation.

4. Final Decision

Once a Complaint's investigation is completed, a Final Response shall be issued to the complainant with the investigation's outcome(s) together with any required explanations and any remedy measures the Company intends to take.

A Final Response is a written response from the Company which either:

(a) accepts the Complaint and, if appropriate, offers redress (appropriate redress may not involve financial redress, it may, for example, simply involve an apology) in accordance to the Company's policy to resolve Complaints in amicable and good business terms;

(b) offers redress without accepting the Complaint, as a gesture of goodwill and in accordance to the Company's policy to resolve Complaints in amicable and good business terms; or

(c) rejects the Complaint and gives reasons for doing so. Further clarifications on the Final Response may be provided following the complainant's subsequent communication with the Company.

A Complaint will be deemed as resolved or settled where the Company has sent in writing a Final Response and/or further clarifications on the Final Response to the complainant.

A. Contact Details of the Financial Ombudsman of the Republic of Cyprus:

Website: <http://www.financialombudsman.gov.cy>

Email: complaints@financialombudsman.gov.cy

Postal Address: P.O. BOX: 25735, 1311 Nicosia, Cyprus

Telephone: +357 22 848900

Fax: +357 22 660 584, +357 22 660 118

If you are not satisfied with the Company's final decision you may check with the office of the Financial Ombudsman of the Republic of Cyprus in case you are eligible to file a complaint with them and seek mediation for possible compensation. It is important that you contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint.

In the unlikely event that the Company was unable to provide you with a final response within the three (3) month time period specified above you may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when we ought to have provided you with our final decision.

B. Contact Details of CySEC:

Website: <http://www.cysec.gov.cy>

General email: info@cysec.gov.cy

Postal Address: P.O. BOX 24996, 1306 Nicosia, Cyprus

Telephone: +357 22 506 600

Fax: +357 22 506 700

You may maintain your complaint with the CySEC. However please note that CySEC does not have restitution powers and therefore does not investigate individual complaints.

It is understood that your right to take legal action remains unaffected by the existence or use of any complaints' procedures referred to above.