



GRAVITY | PRIVATE WEALTH

Complaints Handling Policy

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1. Introduction

Gravity Private Wealth Ltd (hereinafter the "Company") is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus, with registration number HE 442079. The Company is authorized and regulated by the Cyprus Securities and Exchange Commission ("CySEC") under license number 447/24.

This Complaints Handling Policy (the "Policy") sets out the processes employed when dealing with complaints received by clients.

2. Purpose

The purpose of this Policy is to outline the Company's effective and transparent procedures in place for immediate complaint handling for all existing and potential clients so as the Company complies with applicable Laws, Rules and/or Regulations and operates in line with the complaint management procedures of CySEC.

3. Categories of Complaints

Any clients' complaints will be investigated in a prompt way with the necessary attention. The main categories of complaints under which a potential dissatisfaction and/or complaint may fall are indicatively the following:

- a) Transmission of orders (e.g. delay in transmission, etc.);
- b) Investment advice (e.g. unsuitable advice);
- c) Quality or lack of information provided to the client;
- d) Terms of contract / fees / charges (including withdrawal problems, cancelation of profits etc.);
- e) General administration services;
- f) Unauthorised business being offered or carried out;
- g) Other (clients should specify any other reason which does not fall under any of the above categories).



4. How to Make a Complaint

All clients' complaints shall be handled by the Regulatory Compliance Department. However, the final settlement of non-trivial complaints shall be approved by Senior Management.

In order to file a complaint, a complainant shall complete the Complaint Form attached in the Annex hereto. Once completed, the Complaint Form should be sent to one of the following:

- a) in a hard copy along with a copy of the complainant's identification document and any other additional documentation relevant to the complaint, to the Company's head offices, which are situated at Foti Pitta 4, LABS TOWER, 1065, Nicosia, Cyprus; or
- b) by e-mail to complaints@gravitypw.com

Upon receipt of a clients' complaint, the Company will start investigating all relevant evidence and/or information provided. The following information should be provided to and recorded by the Regulatory Compliance Department, whenever possible, so as to make sure that the complaint is expedited in the most efficient and fair way for the best interest of the client:

- a) Full name of the client;
- b) Account Number;
- c) Date when the issue and/or problem first took place;
- d) Short summary of the complaint; and
- f) Provide any other document or otherwise relevant to the complaint.

Once the formal complaint is with the Company, the latter will send a written acknowledgement to the complainant within ten (10) business days from the date the complaint was received, confirming safe receipt of the complaint and that all necessary steps will be taken in order to resolve the complaint. Additionally, the Company will give an estimated timeframe required to resolve the said complaint along with the complainant's unique reference number, which will be assigned to the complaint and which should be used in all future contact with the Company, the Financial Ombudsman and/or CySEC, regarding that specific complaint.

After the above step, the Company will start investigating the client's complaint and within two (2) months, the Company should reply to the complainant about the outcome and/or decision. It is provided that, during

the aforementioned investigation of the complaint, the Company will keep informing the complainant of the handling process of their complaint.

In the event that the Company is unable to respond within the aforementioned two (2) months, it will inform the complainant of the reasons for the delay and indicates the period of time within it is possible to complete the investigation. This period of time cannot and should not exceed the three (3) months from the submission of the complaint.

When the Company reaches a final decision, it will inform the complainant without delay and will provide them with an explanation of its position and propose remedial measures (if applicable).

In case the complaint involves the Regulatory Compliance Department of the Company, then the Senior Management will investigate the client's complaint and reply to the complainant within the timeframes aforementioned.

5. Financial Ombudsman

In the event the complainant is not satisfied with the Company's assessment and decision, they can refer their complaint to the Financial Ombudsman, given that:

- The claimed amount in their complaint does not exceed the amount of €170.000;
- They first file a formal complaint to the Company within fifteen (15) months from the date that they are aware or ought to be aware that the reason of their complaint has occurred;
- They receive the Company's final response and/or decision within three (3) months from the date that the Company acknowledged receipt of their complaint and it is not to their satisfaction or from the closing date by which they should receive the Company's final response in the case they have not received it;
- They submit their complaint to the Financial Ombudsman within four (4) months from the date they received the Company's final response or from the closing date the Company ought to provide it to them in the case they do not receive the Company's final response;
- No judgment has been issued from a Court for the same complaint or not judicial procedure is pending for the assessment of the same complaint.

Financial Ombudsman contact details:

Address: 13 Lord Byron Avenue, 1096 Nicosia, Cyprus

Phone: +357 22 84 89 00

Fax: +357 22 66 05 84, +357 22 66 01 18

Emails:

complaints@financialombudsman.gov.cy fin.ombudsman@financialombudsman.gov.cy

Website: www.financialombudsman.gov.cy

- They may maintain their complaint with CySEC, however please it should be noted that CySEC does not have restitution powers and therefore does not investigate individual complaints.

6. Civil Action

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

Hence, in the event the client is still not satisfied with the decision issued by the Financial Ombudsman in regards to their complaint, they may take further legal steps by filing a civil action in the competent Court in the Republic of Cyprus.

7. Complaints on an ongoing basis

The Company undertakes to analyse, on an on-going basis, complaints-handling data, to ensure that they identify and address any recurring or systemic problems, and potential legal and operational risks, for example by:

- Analysing the causes of individual complaints so as to identify root causes common to types of complaints;
- Considering whether such root causes also affect other processes or financial means, including those not directly complained of; and
- Correcting, where reasonable to do so, such root causes.



8. Reporting of Complaints

Under CySEC's laws and rules, the Company, each month, provides to CySEC, all information in a report, regarding the complaints it receives and how these are being handled.

9. Record Keeping of Complaints Received

The responsible department for the record keeping of complaints received is the Regulatory Compliance Department. Pursuant to CySEC's laws and rules, the Company is required to keep an internal register of complaints where all relevant data and progress of each complaint are kept.

All relevant information and progress of the clients' complaints are reported to the Senior Management, on an annual basis, as well as any remedies undertaken or to be undertaken in regards to any deficiencies and/or weaknesses that the Company may have.

Worth noting is that all information is not shared with any third parties, as the Company complies with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and applicable data protection laws of Cyprus, including Law 125(I)/2018, as the same may be in force from time to time and replaced or amended from time to time.

The Company shall maintain all complaints or grievances for a minimum period of five years.

10. Disclaimer

All of the above do not apply in a case when the client owes money to the Company.

In a case such as the above, the Company reserves its legal rights to initiate legal proceedings against the client, in order to recover any debts owed.

Also, nothing set forth herein shall prevent either party from applying to the competent Court for any of the interim or injunctive reliefs.

Each party acknowledges that a breach of the provisions set out herewith may cause the other party irreparable injury and damage and, therefore, any such breach may be enjoined through injunctive proceedings, in addition to, any other rights and remedies that may be available to either party as per applicable laws or in equity.

11. Implementation and Review

The Company has the right to amend the current Policy at its discretion and at any time it considers suitable and appropriate. Where any amendments take place, the updated version of the present Policy shall be approved by the Company's Board and shall be uploaded to the Company's website.



12. Annex

COMPLAINT FORM

Client Name

Account Number(s)

Phone Number / Email Address

Nature of Complaint

Incident Details (Date when the issue and/or problem first took place)

Desired Resolution