



Synergy Insurance Services
(UK) limited

Customer Complaints Manual

SISUK Complaints Handling Policy

This document introduces the SISUK policy surrounding the management of complaints, the step by step procedures involved when a complaint is identified and also it discusses your rights as a customer to make a complaint.

Complaints are an inevitable circumstance in any fast moving service industry. SISUK has therefore established policies and procedures designed to ensure that any expression of dissatisfaction;

1. from or on behalf of a Customer,
2. whether oral or written, and
3. justified or not, is treated fairly, consistently, effectively and promptly.

Accountability for complaint handling within SISUK is clearly defined in all internal documentation and will be clearly stated in all documentation, correspondence and communication systems (such as web portals) that are made available to Customers and business partners. SISUK complaint officers are experienced, senior managers within the business who understand the operations and who are fully authorised to investigate and act independently within the Company to assess and/ or resolve Customer queries or Customer complaints.

SISUK seeks to differentiate itself in the quality of service it provides to the Customer. The very nature of the Synergy product as a one-stop insurance solution predetermines the need for the highest levels of Customer service and satisfaction. By design, the complaints handling procedure is a reactive safeguard for Customer satisfaction, and as part of its differentiation, SISUK will develop proactive measures to help us learn from our mistakes, to improve our Customer awareness and, ultimately, to help us be more successful in our sales and marketing campaigns.

SISUK has a rigorous and concise complaint handling process, which aims to:

- communicate to Customers our desire for feedback and continuous improvement;
- publish complaints procedures and make them readily available to Customers;
- assist with our learning and development;
- enhance our relationship and awareness of the Customer(s);
- investigate complaints promptly within appropriate (and regulatory) timescales;
- to offer appropriate levels of redress where complaints are upheld;
- keep records of complaints and report complaints data to the FSA;
- co-operate with external parties who may become involved in complaint investigation.

Above all however, SISUK will strive to ensure complete transparency, independence, professionalism and, above all, equality and fairness when dealing with a reported dissatisfaction.

Overview and your right to complain

You have the right to complain about your insurance policy or about the services provided to you in relation to your insurance policy. We are keen to hear from anyone who has a complaint and we will attempt to resolve all complaints whether in writing or not, justified or otherwise.

If you have a complaint or concern about your insurance policy or our services then you should in the first instance contact the person who introduced this policy to you. This would normally be your broker.

If you are not satisfied with the response you receive, or if the broker recommends that you contact us directly, then you can contact one of the Synergy Complaint Officers named below. These people are empowered by the Board of Synergy Insurance Services UK Limited ("SISUK") to investigate any form of complaint from any Customer.

SISUK operates a formal complaints policy, the details of which will be provided to you upon receipt of a complaint. They are also available upon request or via our web-site at www.synergyinsurance.co.uk

SISUK Complaint Officers

Daniel Barrett - Operations Manager
E-Mail: dan.barrett@synergyinsurance.co.uk
Tel. 020 7264 5078

Graham Ward - Finance Director
E-Mail: graham.ward@synergyinsurance.co.uk
Tel: 020 7264 5056

If you remain dissatisfied with the response from the SISUK Complaint Officer for issues raised under; **Section 1 – Buildings, Section 2 – Contents, Section 4 – Valuables, Section 5 – Liabilities, Motor Insurance**, then you may contact the insurance company directly. The Insurer's Complaint Officer is;

Astrid Jennings
Compliance Officer
International Insurance Company of Hannover Limited
L'Avenir, Opladen Way, Bracknell, RG12 0PE
E-mail: Astrid.Jennings@inter-hannover.com
Tel. 01344 397600
Fax. 01344 397601

If you remain dissatisfied with the response from the SISUK Complaint Officer for issues raised under **Section 3 – Fine Art**, then you may ask the Policyholder and Market Assistance department of Lloyds Market Services to review **your** case. Their address is;

Policyholder & Market Assistance
Lloyd's Market Services
Lloyd's, One Lime Street, London EC3M 7HA
Telephone: 0044 (0)20 7327 5693
Fax: 0044 (0)20 7327 5225

If, even after this stage, you remain dissatisfied with the response you may wish to contact the Financial Ombudsman Service (FOS) for further advice and guidance. This will not affect your legal rights.

Financial Ombudsman
South Quay Plaza
183 Marsh Wall
London
E14 9SR

All complaints are recorded by SISUK and we provide a summary of all complaints to the Financial Services Authority. These statistics are also used internally to improve our products and services.

This document summarises the SISUK complaints handling procedure. This is a maintained procedure in accordance with the Financial Services Authority (FSA), the Association of British Insurers (ABI) and, for small businesses, the Financial Ombudsman Service (FOS) terms of reference for complaint management.

SISUK Complaint Handling Procedure

Definition of a Complaint

A complaint may comprise several factors, including but not limited to;

- a stated dissatisfaction, whether justified or otherwise;
- an allegation that SISUK has been negligent in its practices, which has led to financial loss, material inconvenience or distress to the Customer;
- an allegation that SISUK may have breached FSA regulations or acted illegally
- an allegation that SISUK may have exercised some form of discrimination against a Customer.

A complaint involving any of the above will be subject to our internal procedures which govern the acknowledgement, investigation and response to complainants. Below is an overview of these procedures.

SISUK Complaint Officers

Daniel Barrett - Operations Manager
E-Mail: dan.barrett@synergyinsurance.co.uk
Tel. 020 7264 5078

Graham Ward - Finance Director
E-Mail: graham.ward@synergyinsurance.co.uk
Tel: 020 7264 5056

Complaints Handling Procedures

SISUK is pleased to operate in accordance with the Financial Services Authority (FSA), the Association of British Insurers (ABI) and the Financial Ombudsman Service (FOS) complaint management procedures.

We recognise that we have an obligation to Customers who are dissatisfied with our service to resolve any complaint within 8 weeks from the point of notification. If this is not possible for any reason then we will state our reasons for not being able to do so and propose an alternate completion date to the Customer. If we are unable to resolve the complaint within this timescale, or to the Customer's satisfaction, or the Customer does not accept a deferred date, then such complaints may be eligible for consideration by the FSA, FOS or the ABI.

To assist the Customer, we would highlight our complaints procedure.

Acknowledgement

Upon receipt of a complaint, we will provide written acknowledgement within 5 business days (business days are Mon-Fri) of receiving the complaint. The letter will contain details of our Complaints Procedure and of your right to defer the complaint to the Financial Ombudsman if you are dissatisfied with our assessment and ruling. It will also state who within SISUK is dealing with the complaint and how to make contact with them (this will normally be the Complaints Officer).

Initial Response

We will send the complainant a letter no later than 4 weeks after the complaint was made, containing a full account of the investigation activities planned, any findings thus far and, if appropriate, any offer of redress. This letter will again advise the Customer of their rights and who is dealing with the complaint (and how to make contact with that person).

Further Acknowledgement

In the situation whereby the complainant responds to the Initial Response then again SISUK will acknowledge receipt of response with 5 business days.

Holding Response

If, for whatever reason, SISUK is unable to conclude the investigation and provide a Final Response (see below) to the complaint then SISUK will issue what is called a Holding Response (see below). The purpose of this Holding Response is to inform the complainant of the reasons why SISUK cannot provide a Final Response and to provide a further indication of what is happening with the complaint and also to provide an indication of when the complainant can expect to hear from SISUK again. In the event that the complainant receives a Holding Response, SISUK would invite the complainant to discuss the matter personally with the SISUK Chief Executive Officer. The purpose of this step is to ensure that the complaint (and the complainant) receives the highest priority in those situations where the complaint cannot be fully resolved through normal investigatory processes.

Final Response

Once SISUK has completed its investigation we will write to the complainant and offer a summary outcome. Where appropriate, it may also include a final offer of redress. Such letters will be marked clearly as the final response and will include details on how to contact the FOS if the complaint has not been resolved to the complainant's satisfaction or, if the offer of redress is considered insufficient or inappropriate.

SISUK will attempt to send the Final Response within 8 weeks of the initial complaint or 4 weeks after receipt of rejection of offer of redress (where applicable). This may not always be possible as sometimes the complexity of the complaint may require more time to investigate fully. We will always abide by regulatory guidelines in relation to a complaint and as such, we will always ensure that complainants are kept informed about their complaint and our activities in response to their complaint.

Monitoring of Complaints

SISUK are required by the FSA to keep detailed documentation on individual complaints. We are required to report relevant complaints to the FSA and also to our Insurer on a regular basis. Private information will not be shared with any 3rd parties and we comply with the Data Protection Act 1998.

These details will usually include as a minimum;

- The nature, date and method of communication of the complaint
- The complainant's details
- How the Complain was dealt with (outcomes)
- Whether the complaint was upheld or refuted
- Whether the complaint was closed (addressed to complainant's satisfaction) or whether it remains open and outstanding
- What financial redress or other significant outcome resulted from the complaint

Ultimate Redress

If, after contacting all parties the complainant remains dissatisfied with the outcome of the complaint then they may seek redress through the FOS and ultimately the courts if they so wish. Details of the FOS are provided below.

In each instance, we would record upon the complaint file what advice was provided and we would reclassify the complaint to note that it has been 'Investigated but not resolved'. Such claims have been deemed to be investigated by SISUK and reported to the FSA on this basis.

Financial Ombudsman Service (FOS)

The FOS is an independent and government-backed service designed to help retail consumers and small commercial businesses (annual turnover of less than £1 million) who find themselves in a dispute with a financial organisation such as us.

It is a free service and it can be contacted at any point in a dispute providing the complainant has first contacted the financial organisation with whom the dispute relates to. Most cases are resolved within a 6-month period however some inevitably take longer (depending on the nature and complexity of the case). The FOS can consider complaints about a wide range of financial matters – from insurance and mortgages to savings and investments. They are not a regulator or trade body or a consumer champion – their role is to take an objective standpoint and help settle disputes.

Consumers do not have to accept any decision made by the Financial Ombudsman and at all times the consumer has the right to seek redress in a court should they so wish. However if the Ombudsman decision is accepted by the complainant then it is binding both the firm and the complainant.

To contact the FOS, consumers should write or telephone or email their situation to:

Financial Ombudsman Service
South Quay Plaza
183 Marsh Wall
London
E14 9SR

Telephone No.: 0845 0801800

Email address: Complaint.info@financial-ombudsman.org.uk

More information on the FOS can be obtained by visiting www.financial-ombudsman.org.uk or by downloading the booklet entitled "Your complaint and the ombudsman" from this website.