

Complaints Handling Policy

1. Policy Statement

Neural ID Pay has to handle complaints in a consistent, structured and effective manner, allowing customers, or potential customers, the correct access to any recourse available to them, both internally within the relevant firm and externally with the relevant authority. Firms should ensure that they have a written process for dealing with complaints and, by correctly recognizing the enquiry as a complaint, they can ensure:

- they are consistent with regulatory and legal obligations.
- they are effective in positively managing the consumer relationship.
- they have a structure, allowing complaints to be properly escalated.

Neural ID Pay fully accepts its responsibility to treat complainants fairly. It is the policy of Neural ID Pay to respond to customer complaints as quickly as possible and to take each complaint seriously.

2. Complaints Policy

Neural ID Pay is committed to delivering an efficient and professional service. Neural ID Pay aims to provide prompt, courteous, helpful, open and informative advice in response to every approach made by a member of the public. Neural ID Pay is always keen to hear the views of its customers, particularly the general public, about performance generally.

Neural ID Pay aims to:

- Have a clear and open policy on complaints
- Give our team the authority and support to resolve complaints completely and the confidence to tackle the difficult customers
- Reward excellent complaint handling and confirm its importance in providing great customer service
- Handle the many ways to complain efficiently – in person, by telephone, by mail, by email, on the website and publicly on social networks – within the regulatory framework
- Provide prompt, courteous, helpful, open and informative advice in response to every approach made by a member of the public
- Log and analyse all complaints, and share company wide

3. Identification

Any customer or potential customer has the right to complain about our services.

Customer's enquiries may be viewed as a complaint depending on a number of factors – the way the customer feels about the service they have received, whether the service has performed as expected, how the member of staff interprets the customer's comments and any number of other factors. Neural ID Pay has adopted the stance that if anyone dealing with a customer is unsure whether the customer is making a complaint or not, they will deal with it as a complaint.

The definition of a complaint is: "any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, provided service or a redress determination, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience."

Therefore, all customers facing staff will be made aware of this and be fully trained in the identification of a complaint and know how to handle such cases and what the procedure is.

4. Complaints Handling Procedure

Neural ID Pay will ensure customers have access to our Complaints Policy and Procedure upon request and will include a copy of such documentation on our website

Neural ID Pay recognizes it has an obligation to Customers, who are dissatisfied with the service, to resolve any complaint within 15 business days. During the 15 business days, Neural ID Pay staff may inform customers if their complaint is considered to involve exceptional circumstances by indicating the reasons for the delayed response. The final response should either:

- accept the complaint and, where appropriate, offers redress or remedial action;
- offer redress or remedial action without accepting the complaint, or
- reject the complaint and give reasons for doing so.

If Neural ID Pay is unable to provide such a final response within the timeframe before mentioned, a written response will be sent to the complainant explaining why Neural ID Pay is not in a position to make a final response and indicate when a response will be provided. This response will also inform the complainant that they may now refer the complaint to the Financial Ombudsman and will enclose a copy of an explanatory leaflet and applicable website.

5. Making a Complaint

Customers can make a complaint in writing by letter, email or by telephone. Neural ID Pay requires customers emailing complaints to provide either a request for an email response or provide a telephone number or full postal address.

Complaints will normally be directed to the member of staff with whom they have been dealing.

Where the staff member the customer has dealt with is responding to the complaint, Neural ID Pay expects them to use this as an opportunity to explain what actions have been taken and to try to sort things out with the customer.

The customer may prefer to speak to the line manager or the member of staff. This information is to be provided without exception and refusal of an employee to give this information will result in disciplinary action.

In some cases, Neural ID Pay may have to submit the complaint to a third party or respondent. In these cases, Neural ID Pay may forward the complaint promptly to the respondent, having to have explained the reasons for these decisions in the final response to the complainant.

All complaints will be recorded with the measures taken for their resolutions, during a period of time of 5 years. Statistics will be used internally to improve the service.

6. Acknowledgement

When a customer service representative receives a complaint, a written acknowledgement will be provided within 5 business days starting from the day after the complaint was received (business days are Mon-Fri excluding bank holidays). The letter will contain details of the Complaints Procedure and of the customer's right to refer the complaint to the Financial Ombudsman if they are dissatisfied with Neural ID Pay assessment and ruling.

It will also state who is dealing with the complaint and how to make contact with them.

7. Final Response

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

Neural ID Pay accepts that this may not always be possible as on occasions complexity of the complaint may require more time to investigate fully.

Neural ID Pay will always abide by regulatory guidelines in relation to a complaint and as such, Neural ID Pay will always ensure that complainants are kept informed about their complaint and activities in response to their complaint.

The time frame will start from the reception in our systems of the customer's complaint, and the final written response will be provided to the complainant via email or addressed to the personal postal address included on the complaint form.

8. Ultimate Redress

It is Neural ID Pay's policy that after contacting all parties should the complainant remain dissatisfied with the outcome of the complaint then they may seek redress through the Financial Ombudsman and ultimately the courts if they so wish.

In each instance, Neural ID Pay will mark on the complaint file what advice was provided and will then reclassify the complaint as 'Investigated but not resolved'.

9. Record Keeping

It is the responsibility of all staff to ensure that records are accurate, up to date, factual and complete at all times. The MLRO is responsible for completing the Complaints Register.

All complaints and supporting documentation will be kept for a period of five years in accordance with regulatory requirements.

Records will be used to identify trends and to improve services offered to customers. This could be anything from policy reviews and process changes to re-training of front line staff or improving customer communication methods.