

Commerzbank Zrt. Complaint Management Notice (policy)

Dear Client,

Our colleagues make all effort to provide You the most efficient service, however, there may be situations where there is a disagreement between You and Commerzbank Zrt. Our aim is to remedy such situations with great efficiency and within the shortest possible time. For this reason, please, read the following information that contains information related to complaints, complaint management, investigations and the associated procedures.

This notice complies with the MNB Decree 28/2014. (VII.23.) on the rules pertaining to complaint management of financial institutions, the MNB Recommendation 13/2015. (X.16.) on the complaint handling procedure of financial institutions, and the Government Decree 435/2016. (XII.16.).

What is considered as a complaint?

A complaint is your objection to an action or neglect of the Bank in connection with the conclusion of the contract, during the term of the contract, related to the performance of the Bank, and relating to the termination of the contract or any act or neglect following the termination thereof. So a complaint is when you consider that the Bank committed an infringement when it failed to conclude a contract with you, or failed to conform with the (verbal, written) contract concluded with you, resulting in a grievance for you.

I. Ways to submit a complaint

1. Verbal complaint:

- a) personally
 - During business hours at the Bank's head office (H-1054 Budapest, Széchenyi rkp. 8., www.commerzbank.hu), and
 - in any of our regional offices, only [upon appointment agreed in advance](#)
- b) via phone on the (06 1) 374-8100 phone number, only during the business hours, and until 8 p.m. on Thursdays;

2. Written complaint:

- a) in a document submitted personally or by a proxy at the address defined in Clause 1.a),
- b) via mail (mailing address: 1245 Budapest, P.O. Box: 1070),
- c) via fax sent to our central number: +36-76-502-557,
- d) via e-mail sent to (info.budapest@commerzbank.com).

You may also submit your written complaint using the complaint form of Commerzbank Zrt. available in our website

(https://www.commerzbank.hu/portal/media/corporatebanking/auslandsseiten/ungarn-informationen/englisch-/impressum-2/panaszbejelento_nyomatvany.pdf).

or on the form published on the website of the Central Bank of Hungary (MNB) (<https://www.mnb.hu/fogyasztovedelem/panaszom-van/formanyomatvanyok>).

3. You may also engage a proxy to act on your behalf. In this case the power of attorney shall be incorporated into a notarial deed or a private document with full probative force.

II. Investigation of complaints

Complaints are investigated free of charge, and no fees may be charged for the investigation of complaints.

Complaints are investigated with the consideration of all relevant facts.

1. Verbal complaint:

1.1 Verbal complaints – including those made personally and via phone – must be investigated promptly and remedied as far as possible. For verbal complaints made via phone, the Bank shall ensure that your call is answered and your complaint is administered within a reasonable waiting time. If the complaint at hand cannot be investigated immediately, the Bank shall draw up a minute of your complaint.

1.2 Please, note that your call with your complaint is recorded.

1.3 The Bank retains the recordings of complaint calls for 5 years.

1.4 At your request, you may listen the call, furthermore the Bank provides you with the certified minutes of the recording, free of charge.

1.5. If you disagree with the management of your verbal complaint, the Bank draws up a record of your complaint and your associated opinion.

1.6. For complaints made personally, you receive a copy of the minute, and for complaints made via phone, you will receive the copy of the minute together with our answer to your complaint. In the latter case, our reasoned answer to the complaint will be sent within 30 calendar days of your complaint.

1.7. Where the legal regulations require that a minute to be drawn up, it shall contain at least the following:

- a) client's name,
- b) client's address, registered seat and, if necessary, mailing address,
- c) place, time and method of submitting the complaint,
- d) details of the client's complaint separately specifying the objection points of the complaint to ensure that each point of the client complaint is fully investigated,
- e) the number of the contract concerning the complaint, also client number as the case requires,
- f) list of documents and other evidence presented by the client,
- g) when the immediate investigation of the complaint is not possible, except for complaints via phone, the signature of the client and the employee drawing up the minute, and
- h) place and date of the minutes taken of the complaint, and
- i) name and address of the service provider (Bank) concerning the complaint.

2. Written complaint:

2.1 We will send you our reasoned position concerning your written complaint as soon as possible, but not later than within 30 calendar days of submitting your complaint, and within 15 business days in response to written complaints about payment services. If the complaint (regardless of its nature) cannot be answered within the statutory 30 days (except for complaints related to payment services), the Bank shall inform you about the reason of the delay and, if determinable, the foreseen completion date of the investigation. In case of complaints related to payment services, if any part of the complaint cannot be answered within 15 business days for reasons beyond the control of the Bank, the Bank shall send you an interim response specifying the reasons of the delay and the date of the final answer. However, the final date of the answer, may be later than the 35th business day following the submission of the complaint.

You have the right to inquire about the progress of the investigation of your complaint.

If the Bank requires additional information from your – therefore particularly information required for your identification and pertaining to the legal relationship concerning the complaint – to investigate your complaint, the Bank shall contact you promptly to obtain such information.

III. Rules of data processing pertaining to the complaint

1. Please note, that the Bank may request you to provide us with the following data:

- a) name,
- b) contract number, client number,
- c) address, registered office, mailing address,
- d) phone number,
- e) preferred way of notification,
- f) product or service concerning the complaint,
- g) description and reason of the complaint,
- h) client's claims,
- i) copy of the documents not available at the service provider, but held by the client and required to substantiate the complaint,
- j) a valid power of attorney in case the client is proceeding by way of a proxy, and
- k) any other data, required for investigating and answering the complaint.

2. The data of the client submitting the complaint shall be processed in compliance with the provisions of Act CXII of 2011 on informational self-determination and freedom of information.

IV. Information obligation during complaint management

1. If the complaint is declined or the statutory 30-day response time limit for investigating the complaint passes unsuccessfully, the clients considered as consumers may contact the following authorities:

a) Financial Arbitration Board (for disputes regarding the conclusion-, validity, legal effects and termination of contracts, as well as breach of contract and its legal effects):

Mail address: H-1525 Budapest BKKP P.O. Box: 172

Website: <http://www.mnb.hu/pbt>

E-mail: pbt@mnb.hu

Phone: 061-4899-100

b) MNB (National Bank of Hungary) Financial Consumer

Protection Center: Mail address: 1534 Budapest BKKP

P.O. Box: 777

Website: www.mnb.hu

E-mail: ugyfelszolgalat@mnb.hu

Customer service phone number: 061-4899-100

c) court with jurisdiction under the rules of the Code of Civil Procedure of Hungary.

2. If the complaint is dismissed or the statutory 30-day response time limit for investigating the complaint passes unsuccessfully, the clients not considered as consumers may go to court.

3. If the complaint is dismissed or the statutory 30-day response time limit for investigating the complaint passes unsuccessfully, the consumers must be informed that they may request the application form for instituting a proceeding with the Financial Arbitration Board or the Financial Consumer Protection Center.

V. Registration of complaints

1. The Bank keeps a record of the complaints as well as the actions taken to settle and remedy complaints.

This record contains the following:

a) the description of the complaint, indication of the event or fact underlying the complaint,

b) the submission date of the complaint,

c) the description of the measure(s) taken to settle or remedy the complaint, or the reasons of the declined complaints,

d) the deadline for completing the relevant action and the name of the person in charge of execution thereof,

e) the date of the posting of the response letter to the complaint.

2. Complaints and the responses are retained for five years.