

**Commerzbank Zrt.
Complaint Management Notice (Policy)**

Dear Client,

Our colleagues make all effort to provide You with 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 46/2018.(XII.17.) on the rules pertaining to complaint management of financial institutions, the MNB Recommendation¹ 16/2021. (XI.25.) 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/ungar-n-informationen/2014-3/panaszbejelento_nyomtatvany.pdf)

or on the form published on the website of the Central Bank of Hungary (MNB) [fogyasztoi-panasz-szolgaltatonak-20180904-1.pdf \(mnb.hu\)](http://fogyasztoi-panasz-szolgaltatonak-20180904-1.pdf)

3. You may also authorize another person to lodge a complaint on behalf of your company. In this case the proxy must be a public deed or private deed with full probative value pursuant to Act CXXX of 2017 on the Code of Civil Procedure, and must include an exemption from the

1. Our bank is not in service with retail customers. Regarding to this, the current Complaint Management Notice (Policy) does not contain provisions to the customer-related points of the referred MNB recommendation.

obligation of confidentiality regarding bank secret pursuant to Section 161 of Act CCXXVII of 2013 on Credit Institutions and Financial Enterprises, a description of the matter of the complaint and the number of the relevant contract or bank account. The proxy must include the registered seat of the company, the company registration number, the authorising representative of the company, the name, place and date of birth, address, identity card number and mother's maiden name of the authorised representative acting on behalf of the company during the complaint procedure. In case the authorising representative is also the managing director, the proxy must be duly signed as entered into the company register. In addition, it is necessary to indicate the names of the witnesses in a readable way and their official address or the address of the place of stay.

When acting by proxy, you may use the standard form of proxy provided by our Bank, which is available on our website and at the premises open to our customers.

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 must take all reasonable steps to ensure that the customer will be put through to a Customer Service Manager within 5 minutes of a successful ingoing call.

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 Upon request, you may listen to the audio replay of the call, furthermore, within the legal timeframe, the Bank (depending on your request), provides you with the certified copy of the minutes of the voice recording or a copy of voice 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, furthermore in case of complaints made via phone, the Bank provides you with the relevant data for the identification of the complaint.

1.6. For complaints made personally, you receive a copy of the minutes, and for complaints made via phone, you will receive the copy of the minute together with our answer to your complaint.

1.7. The certified copy of the minutes 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) in case of complaints made personally 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

1.8. Within the time limit set out in section 2 we will send you a reasoned opinion about your verbal complaint that hadn't been handled instantly .

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.

2.2 The Bank will transmit the reasoned opinion regarding the complaint electronically (in the same manner as is used for the submission of the complaint) if the complaint had been received through the e-mail address you provided and registered by the Bank or through the Internet portal operated by the Bank and which is accessible only to you and if not otherwise requested by you.

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

If the Bank requires additional information from you – 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 and documents:
 - 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 Bank, but held by you 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 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):
Customer Service address: H-1013 Budapest, Krisztina krt. 39., Hungary
Postal address: H-1525 Budapest, P.O. Box: 172

Website: www.penzugyibekeltetotestulet.hu; <https://www.mnb.hu/bekeltetes>
E-mail: ugyfelszolgalat@mnb.hu
Phone: +36-80-203-776

- b) MNB (Hungarian National Bank) Financial Consumer Protection Center:
Customer Service address: H-1013 Budapest, Krisztina krt. 39., Hungary
Postal address: H-1534 Budapest BKKP P.O. Box: 777
Website: www.mnb.hu/fogyasztovedelem
E-mail: ugyfelszolgalat@mnb.hu
Customer service phone number: +36-80-203-776

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

2. If the complaint is dismissed or the statutory 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 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 MNB (Hungarian National Bank) 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 (in case of electronic response the date of sending) of the response letter /message to the complaint.
2. Complaints and the responses are retained for five years.