

Dolfin Complaints Handling Policy

Version April 2020

Contents

Version April 2020	0
Dolfin Complaints Handling Policy	0
Contents	1
Introduction	1
Purpose	1
Definition of Complaint	1
Does this apply to you?	2
How can you make a complaint?	2
What we will do once we have received your complaint?	2
Investigating and resolving your complaint	2
Timeline for responding to you	3
Financial Ombudsman Service (“FOS”)	3
Closing complaints	3
Contacting us	3

Introduction

We are required to establish, implement, and maintain an effective conflicts of interest policy that is appropriate to the size and organisation of our firm and the nature, scale, and complexity of its business. Below is a summary of our Conflicts of Interest Policy.

Purpose

For the protection of clients, we have a complaint handling procedure in place to ensure that all complaints are handled fairly and efficiently. As a client, you are entitled to make a complaint to us. Set out below are the procedures that we will follow in the event that you make a complaint.

Definition of Complaint

The FCA defines a complaint as:



“Any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about the firm’s provision of, or failure to provide, a financial service”.

A complaint must involve an allegation that the complainant has suffered, or may suffer, financial loss, material inconvenience or material distress.

Does this apply to you?

The entitlement to make a complaint applies to any client of Dolfin for financial services. If you are dealing with Dolfin through a financial intermediary, such as an investment adviser or wealth manager, please direct your complaint initially to your primary contact at the financial intermediary, as they will be better placed to advise you on your complaint and the steps you can take.

How can you make a complaint?

You can make a complaint by any reasonable means – for example, letter, fax, email, telephone or in person. If you make a complaint verbally, we will ask you also to put the complaint in writing (e-mail is acceptable). If you make a verbal complaint, but do not follow-up the complaint in writing, we will nevertheless investigate the complaint.

All written complaints should be addressed to the Head of Compliance at Dolfin Financial (UK) Ltd., 50 Berkeley St, Mayfair, London W1J 8HD, United Kingdom. If sent by e-mail, please address the e-mail to compliance@dolfin.com marked for the attention of the Head of Compliance.

What we will do once we have received your complaint?

Once we have received the complaint, we will acknowledge receipt within three business days. We will acknowledge receipt by sending you a holding letter together with our complaint’s procedure and a Financial Ombudsman Service explanatory leaflet. Thereafter, we will keep you informed of the progress of measures being taken for the resolution of your complaint.

Investigating and resolving your complaint

We aim to resolve complaints within eight weeks of the receipt of your complaint. The Head of Compliance will investigate your complaint or may appoint an employee or employees of sufficient standing and competence within the Compliance Department to do so. Such persons will not have been directly involved with the subject matter relating to the complaint.

Within the 8-week time limit, we will investigate the complaint competently, diligently, and impartially, obtaining additional information as necessary and assess the complaint fairly, consistently, and promptly. We will, taking into account all relevant factors, look at:

- the subject matter of the complaint;
- whether the complaint should be upheld;
- what remedial action or redress (or both) may be appropriate; and
- if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.

When the investigation is completed, we will:

- offer redress or remedial action when we decide this is appropriate;



- explain to you promptly and in a way that is fair, clear, and not misleading, our assessment of the complaint, our decision on the matter and any offer of remedial action or redress, and
- comply promptly with any offer of remedial action or redress accepted by you.

Timeline for responding to you

We must, by the end of eight weeks after receipt of your complaint, send you a final response or a written response which explains why we are not in a position to make a final response and indicates when we expect to issue one.

A 'final response' is a written response from us which:

- accepts the complaint and, where appropriate, offers redress or remedial action; or
- offers redress or remedial action without accepting the complaint; or
- rejects the complaint and gives reasons for doing so.

If you remain dissatisfied with our final response or if we are unable to issue a final response within eight weeks of your complaint, we will inform you that you may refer your complaint to the Financial Ombudsman Service and will provide information on the Financial Ombudsman Service, including its website address.

Financial Ombudsman Service ("FOS")

In the circumstances described above you may refer your complaint to the FOS provided that you are an eligible complainant. Your rights are set out in the FOS's leaflet "Your Complaint and the Ombudsman" which provides a detailed complaints process. Please remember that if you wish to refer a complaint to the FOS, you must do so within six months of receiving our final response.

Only persons who are 'eligible complainants' may refer their complaints to the FOS. Broadly, eligible complainants include individuals and small businesses, charities, and trusts. A definition of 'eligible complainant' can be found in rule 2.7.3 of the FCA's Dispute Resolution: The Complaints sourcebook (DISP).

Closing complaints

A complaint is closed when you indicate in writing your acceptance of an earlier response from us or when the FOS informs us in writing that the complaint has been closed.

Contacting us

If you have any queries regarding this procedure, please write to the Head of Compliance at Dolfin Financial (UK) Ltd., 50 Berkeley St, Mayfair, London W1J 8HD, United Kingdom or send an e-mail to compliance@dolfin.com marked for the attention of the Head of Compliance.

