

# Memo for submission and handling of complaints

Effective since 2024 12 13

## General provisions

The purpose of this memo is to inform customers about the form and communication channels for submitting complaints, the period for responding to the Complaint and the communication channel used for the response. This memo also includes information about the body that conducts pre-judicial proceedings, judicial and the supervisory authorities to which a customer may file a complaint regarding the activities of Luminor.

**Customer** is a natural person or legal entity to whom Luminor provides or intends to provide financial services.

**Luminor** is Luminor Bank AS (including all its branches established in and outside Estonia) and all its subsidiaries established in and outside Estonia (including all branches of such subsidiaries established in and outside of Estonia).

**Complaint** is an expression of dissatisfaction with a service, product, consultation provided by Luminor or Luminor partner, submitted by a customer directly to Luminor or to a relevant. It states that Luminor's activities, including acting as an intermediary (e.g. insurance intermediary), have breached the customer's rights or legitimate interests. A complaint can be submitted via all channels where Luminor is available in verbal or written form.

For further questions regarding this memo and writing or submitting a complaint, please contact Luminor by phone [+370 5 239 3444](tel:+37052393444), by e-mail [info@luminor.lt](mailto:info@luminor.lt) or visit any Luminor branch.

## 1. Submission and acceptance of complaints

1.1. A customer may submit a complaint in verbal or written form and via channels where Luminor is available (internet bank, website, web chat, email, mail, phone, Facebook, etc.).

1.2. If a customer complains verbally in an unrecorded call, Luminor may ask them to submit the complaint in written form.

1.3. A customer has to provide all relevant facts related to the complaint. We recommend using the Complaints and feedback form, which covers all necessary details, such as:

- (1) full name and surname (if the customer represents a company, then also the company's name);
- (2) personal ID code or date of birth (if the customer represents a company, then the company's code);
- (3) contact details;
- (4) description of the concern and expected outcome or solution from Luminor;
- (5) preferred communication channel for receiving a reply.

1.4. Luminor will notify the customer about not taking further action:

1.4.1. If the complaint contains insufficient or inaccurate information and / or it does not comply with the requirements specified in clause **Error! Reference source not found.**1.3 and Luminor does not possess enough information to handle the complaint. In these cases, the customer is asked to provide additional information;

1.4.2. If the complaint is insulting or offensive (e.g. obscene language is used etc.).

## **2. Handling of complaints**

2.1. Luminor will inform the customer of the acceptance and period for solving the complaint upon receipt of the complaint.

2.2. If a customer is not identified or anonymous, Luminor will inform the customer that a response will be provided after the customer's identification process is completed.

2.3. If Luminor needs more information from the customer or more time, Luminor will contact the customer additionally.

2.4. Handling of complaints (including insurance area related complaints) is free of charge for customers.

## **3. Responding to complaints**

3.1. Luminor will carefully examine the complaint and provide a reply as soon as possible, but no later than within 15 calendar days from the submission date. If the investigation of the complaint takes more than 15 calendar days, Luminor will contact the customer in writing (via email) or over a recorded phone call to inform the customer about the complaint's handling status, explain the reason for the delay and provide a new deadline.

3.2. Luminor will forward the complaint related to insurance products or insurance distribution services to the respective insurance company within 1 (one) working day. Luminor will inform the customer about this.

3.3. Luminor will provide the answer to a complaint via the channel requested by the customer when submitting the complaint. If a preferred channel is not mentioned, the response will be provided via the same channel as the Complaint was submitted, if possible, or in writing via the internet bank, email or regular mail.

3.4. Luminor will respond to the customer explaining Luminor's explicit position to satisfy, partially satisfy or decline the complaint; the reasoning for the decision and information regarding out-of-court complaint resolution or other means of appeal, including the contact details of such a handling body, in order to protect the customer's rights after the decision that the complaint is not justified or only partially justified.

3.5. If the customer does not agree with the response and has arguments or additional important information that has not been provided or has not been evaluated, we suggest contacting us again.

## **4. Supervisory authorities, bodies conducting pre-judicial proceedings, court**

4.1. If the customer is not satisfied with the decision, they can appeal the response with external dispute resolution bodies, such as the financial supervisory authority or another institution, or take civil action according to applicable local regulatory requirements. The customer can appeal with:

4.1.1. The Bank of Lithuania via the electronic dispute settlement platform [E-Government Gateway](#).

4.1.2. If the customer does not have the opportunity to submit an application via the platform, they can fill in [the User's application form](#) and send it to the Law and Licensing Department of the Bank of Lithuania by e-mail [prieziura@lb.lt](mailto:prieziura@lb.lt) or by post to Totorių str. 4, 01121 Vilnius.