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HF Markets (Europe) Ltd

COMPLAINTS HANDLING PROCEDURE

Complaints Handling Procedure

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1. Introduction

- 1.1. HF Markets (Europe) Ltd (hereinafter the “**Company**”) which is a member of HF Markets Group, is incorporated under the laws of the Republic of Cyprus with Registration No. HE 277582 under the Department of Registrar of Companies and Official Receiver (www.mcit.gov.cy). The Company is authorised and regulated by the Cyprus Securities and Exchange Commission (“**CySec**”) to act as a Cypriot Investment Firm (License No. 183/12) and to provide the Services specified in the Account Opening Agreement found on the Company’s website, and operates under the Law 144(1)/2007 which provides for the provision of investment services, the exercise of investment advice, the operation of regulated markets and other related matters (the “**Law**”) which has implemented the Markets in Financial Instruments Directive (EU Directive 2004/39/EC).
- 1.2. The Company acting in its capacity as a Cypriot Investment Firm and in accordance with the provisions of the Law is required to have in place and disclose to its Client’s a Complaints’ Handling Procedure (the “**Procedure**”), which is described in this document.

2. Interpretation of Terms

- 2.1. Unless the context requires otherwise, all terms included in this Procedure shall have the meaning given to them herein. Where the context requires, (a) words importing the singular shall include the plural and vice versa and (b) words importing the masculine shall include the feminine and vice versa.

3. Scope of the Complaint Handling Procedure

- 3.1. The purpose of the Procedure is to set out the internal complaint resolution system and procedures which the Company has established, maintains and follows for the resolution of complaints.

4. Definition of a Complaint

- 4.1. A complaint is an expression of dissatisfaction addressed to the Company by a Client (a natural or legal person) relating to the provision of investment and/ or ancillary services under the Law.
- 4.2. A Complainant is a natural or legal person who is presumed to be eligible to have a complaint considered by the Company and who has already lodged a complaint.
- 4.3. A complaint received by a Client shall include:
 - a. the Client's name and surname;
 - b. the Client's trading account number;
 - c. the affected transaction numbers, if applicable;
 - d. the date that the issue arose and a description of the issue.
- 4.4. A complaint must not include offensive language directed either to the Company or a Company employee.

5. Procedure

- 5.1. All complaints or grievances must be in writing and shall be addressed, to the Customer Support Department of the Company via email at support@hfeu.com (for any issues other than trading issues) or the Trading department reachable at trading@hfeu.com for any trading issues (hereinafter the "**Departments**").
- 5.2. If the Client is unsatisfied by the response from any of the Departments and/or if any of the Departments are unable to resolve the complaint, the matter shall be forwarded to the Client Audit Team, an independent body of the Company whose sole duty and commitment is to cope with complicated complaints and which will independently and impartially investigate the complaint. The Client may contact the Client Audit Team directly at clientaudit@hfeu.com.
- 5.3. The Company will not be able to handle or investigate a complaint if the requirements included in paragraphs 4.2 and 4.3 above are not fulfilled. In such an event the Company

shall revert back to the Client and request him to send any additional information. In any event, one of the Company's officers may contact the Client directly in order to obtain further clarifications and information relating to his complaint. The Company shall need the Client's cooperation in order to handle the complaint.

- 5.4. Upon receipt of the complaint the department which has received the complaint shall record the complaint in the complaints registered maintained by the Company as per Par. 8 of the Procedure.
- 5.5. The Company shall thoroughly examine all complaints as required (taking into account any information contained within the books and records of the Company, including but not limited to the Client's trading account history) without undue delay.
- 5.6. The Company will treat each complaint with reasonable care and reach a fair outcome.
- 5.7. Upon receiving the complaint, the Company will inform the complainant within five (5) business days that it had received the complaint and provide him with a unique reference number, which shall correspond solely to his complaint and it must be used throughout his correspondence with the Company regarding the specific matter and/or complaint.
- 5.8. The Company shall send its initial response to the Client within ten (10) business days from the actual receipt of the complaint. If the complaint requires further investigation and it cannot be resolved it within ten (10) business days, it will issue a holding response in writing or in another durable medium. When a holding response is sent, it will indicate when the Company will make further contact and inform the Client on the progress of the investigation.
- 5.9. The Company shall investigate and reply to the complainant within two (2) months from the date of reception of the complaint.

- 5.10. Upon completion of the investigation the Company shall send a written notice to the complainant informing him:
- (a) Of the outcome of the investigation along with the reasons for reaching such a decision; or
 - (b) If applicable, the nature and terms of any offer and/or settlement.
- 5.11. If the Company does not manage to conclude its investigation and/or respond to the complainant within two (2) months from the date of receipt of the complaint, the Company shall send a written notice explaining the reasons for not reaching a decision and/or concluding the investigation yet, the reasons for the delay as well as indicate the period of time within it shall be able to complete the investigation. It is noted that the Company shall not provide its response later than three (3) months from the submission of the complaint.
- 5.12. The Client reserves the right to take any legal action; such a right remains unaffected by the existence and/or use of any complaints procedures referred to above.
- 5.13. If the complainant is not fully satisfied with the Company's response on the matter he may refer his complaint, along with the unique reference number and a copy of the Company's final response, to CySec and if necessary to the Financial Ombudsman, within a period of six months, for further investigation. (Contact details are specified in Par. 9 of the Policy.)
- 5.14. If a complaint is resolved in favour of the Client, the Company shall promptly ensure the full and appropriate level of redress to be offered to the Client without any delay.

6. Principles of the Procedure

- 6.1. All complaints shall be treated confidentially.
- 6.2. The Company shall handle Client's complaints in a timely and fair manner.

- 6.3. The company shall take all reasonable steps to investigate and respond promptly to any complaints.
- 6.4. The Company shall use its best endeavours to provide the best service to its Clients.

7. Frequently Asked Questions (FAQs)

- 7.1. Questions regarding this procedure should be sent to the Customer Support Department.

8. Record Keeping

- 8.1. The Company has established, maintains and updates the complaints register with details of all the complaints received per month for a period of five (5) years. The following information is recorded in the complaints register:
 - (a) date of the complaint;
 - (b) wallet number;
 - (c) identification of the complainant;
 - (d) complaint cause;
 - (e) the financial instrument;
 - (f) the disputed amount;
 - (g) settlement date if applicable; and
 - (h) any comments thereof.

9. Trading with CFDs on cryptocurrencies

- 9.1. The Client acknowledges, confirms and understands that there is no specific EU regulatory framework governing the trading with CFDs on cryptocurrencies and therefore trading with such products falls outside the scope of MiFID's regulated activities.
- 9.2. The Client further acknowledges, confirms and understands that he has no rights to report a dispute arising in connection with the specific products, to the Cyprus Financial Ombudsman.

10. Contacts

10.1. Customer Support Department: support@hfeu.com

10.2. Trading Department: trading@hfeu.com

10.3. Client Audit Team: clientaudit@hfeu.com

10.4. CySEC: www.cysec.gov.cy

10.5. Financial Ombudsman: www.financialombudsman.gov.cy

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