Cluberly App Limited — Internal Complaints Policy

Version: V1.3

Effective Date: 04/11/2025

Last Updated: 04/11/2025

1. Purpose

This policy sets out how Cluberly App Limited staff must handle customer complaints. It ensures consistency, fairness, and compliance with regulatory obligations.

2. Scope

Applies to all staff involved in customer support, operations, compliance, and legal functions. Covers complaints received via:

- Email: complaints@cluberlyapp.com
- Phone: 020 4623 8702
- Post: Cluberly App Ltd Member Services, North Lodge, Hawkesyard, Armitage Lane, Rugeley, WS15 1PS

3. Definition of a Complaint

A complaint is any expression of dissatisfaction, whether justified or not, about a product, service, or interaction with Cluberly.

4. Roles and Responsibilities

Role	Responsibility
Customer Experience	First-line response, logging, and triage
Compliance	Oversight, regulatory reporting, escalation
Legal	Final Response drafting, dispute resolution
Bondsmith Liaison	Handling savings-related complaints

5. Complaint Handling Process

1. Acknowledgement: Acknowledge within 24 hours (or 5 working days for Bondsmith complaints).
2. Initial Response: Aim to resolve within 3 working days.
3. Follow-Up: If unresolved, follow up within 15 working days.
4. Final Response: If unresolved after 35 working days, issue Final Response with escalation options.

6. Bondsmith Complaints

For savings-related complaints:
- Acknowledge within 5 working days
- Aim to resolve within 15 working days
- Update customer within 4 weeks
- Final Response within 8 weeks

7. Escalation Routes

Escalation Level	Contact
Issuing Bank	complaints@idtfinance.com
Gibraltar FSC	complaints@gfsc.gi
Financial Ombudsman	complaint.info@financial-ombudsman.org.uk

Staff must include these options in Final Response letters where applicable.

8. Record Keeping

All complaints must be logged in the Complaints Register and retained for a minimum of six years. Include:

- Customer name and contact
- Nature of complaint
- Dates of receipt and response
- Outcome and resolution

9. Training and Review

Staff will receive annual training on complaint handling. This policy will be reviewed every 12 months or following regulatory changes.