Complaints

How we receive, review and resolve complaints about our insurance and reinsurance distribution services. Free of charge, answered within 20 days, with further recourse to the Latvian Insurance Brokers' Association ombudsman and the financial supervisor.

Submit a complaint: office@marine-group.eu →

Procedure for Handling Customer Complaints

Terms Used

Complainant
a person who intends to conclude an insurance or reinsurance contract, a policyholder, an insured person or a person entitled to claim insurance indemnity under a concluded insurance contract, and a reinsurance policyholder.

Company
the limited liability company "Europe Marine Group".

Complaint
a statement of dissatisfaction with insurance or reinsurance distribution carried out by the Company or by an ancillary insurance intermediary registered in the Company's register of ancillary intermediaries. Within the meaning of these rules, a statement shall not be considered a complaint if, for a natural person, it does not state the first name, surname and details allowing that person to be unambiguously identified, and, for a legal person, it does not state the name and registration number.

Employee
an employee of the Company directly involved in insurance or reinsurance distribution, or an employee of an ancillary insurance intermediary registered in the Company's register of ancillary intermediaries, regarding whose actions in insurance or reinsurance distribution a Complaint has been submitted.

Person responsible for handling Complaints
a person appointed by the Company's Management Board who, at the management level of the Company, is responsible for the Complaint handling process and who ensures the verification of the facts stated in the Complaint, control of the effectiveness of the Complaint handling process, prevention of possible conflicts of interest, and reporting in compliance with this document.

1. General Provisions

1.1. This document and any amendments to it shall be approved by the Company's Management Board.

1.2. The Company handles complaints only regarding insurance distribution carried out by Employees.

1.3. The Company shall familiarise the persons involved in handling complaints with this document, and this document shall be available to all employees of the Company directly involved in insurance and reinsurance distribution.

1.4. At all insurance and reinsurance distribution locations during their working hours, and on all websites, if there are several, the Company shall provide clear, accurate, always up-to-date and freely accessible information on the following:

1.4.1. the Complaint must contain all the details specified in Clause 2.4 of this document;

1.4.2. the handling of Complaints is free of charge;

1.4.3. the Complaint shall be addressed to the person specified in Clause 2.2 of this document;

1.4.4. a Complaint may be submitted in the ways specified in Clause 2.3 of this document;

1.4.5. the Complaint will be handled by the person specified in Clause 2.2 of this document;

1.4.6. in accordance with Clause 4.9 of this document, the person whose actions are the subject of the Complaint will not be involved in handling the Complaint;

1.4.7. a reply to the Complaint will be given within the time limit specified in Clause 4.2 of this document;

1.4.8. the Company's supervisory authority is Latvijas Banka (the Bank of Latvia), address: K. Valdemāra iela 2A, Rīga, LV-1050, e-mail: info@bank.lv, website: www.bank.lv;

1.4.9. the Complainant may also submit the Complaint to the institutions specified in Clause 2.6 of this document.

1.5. If the Company receives a Complaint about another market participant, the handling of which does not fall within the competence of the Company as set out in Clause 1.2 of this document, the

Company shall, within seven days of the date of receipt of the Complaint, forward the Complaint to the relevant market participant and inform the Complainant thereof.

1.6. The Company shall ensure that the Person responsible for handling Complaints is familiarised with this document and that this document is available in the Company's office premises and in its electronic system to all employees of the Company directly involved in insurance or reinsurance distribution.

2. Rights and Obligations of the Complainant

2.1. Every person has the right to submit a Complaint to the Company.

2.2. The Person responsible for handling Complaints is Ruslans Verdens, to whom all Complaints submitted to the Company shall be addressed.

2.3. A Complaint may be submitted in paper form by sending it by post or by submitting it in person at the Company's address Bērzaunes iela 12, Rīga. A Complaint may be submitted electronically by sending it to the Company's e-mail: office@marine-group.eu. A Complaint may also be submitted orally by contacting the Person responsible for handling Complaints by telephone at +371 20877778 or by meeting in person.

2.4. The Complaint shall contain at least all of the following details:

2.4.1. for a natural person – the first name, surname and details allowing that person to be unambiguously identified; for a legal person – the name and registration number;

2.4.2. the specific Employee regarding whose actions in insurance or reinsurance distribution the Complaint is submitted;

2.4.3. the grounds for dissatisfaction with the actions of the specific Employee in insurance or reinsurance distribution, setting out the factual circumstances in as much detail as possible, stating the reasons for dissatisfaction and attaching to the Complaint documents substantiating the reasons for dissatisfaction;

2.4.4. if the Complaint is made in writing – the personal signature of the complainant (a natural person), or, in the case of a legal person – the personal signature, first name, surname and position of its representative; if the Complaint is signed by an authorised person, the original power of attorney shall be attached to the Complaint.

2.5. In the Complaint, the Complainant has the right to request the Company to compensate losses that have arisen directly and as a causal consequence of the Employee's intentional, malicious unlawful conduct or gross negligence.

2.6. Regarding a dispute between the Complainant and the Company, a Complaint may also be submitted to the institution (ombudsman) established by the Latvian Association of Insurance Brokers, information on which is published at www.brokers.lv, or to the Company's supervisory authority, Latvijas Banka (the Bank of Latvia), address: K. Valdemāra iela 2A, Rīga, LV-1050, e-mail: info@bank.lv, website: www.bank.lv.

3. Rights and Obligations of the Company

3.1. The Company and the Person responsible for handling Complaints have an obligation to accept any Complaint drawn up in accordance with the requirements of this document. The Person responsible for handling Complaints may ask the Complainant to put an orally submitted Complaint in writing personally, or may record it in writing themselves and ask the Complainant to sign it.

3.2. Only Complaints drawn up in accordance with the requirements of this document shall be handled. A statement which, for a natural person, does not state the first name, surname and details allowing that person to be unambiguously identified, and, for a legal person, does not state the name and registration number, shall not be considered a Complaint and shall not be handled.

3.3. The Company and the Person responsible for handling Complaints have the right to ask the Complainant to submit additional information on the circumstances stated in the Complaint, if this is necessary to clarify those circumstances.

3.4. At the request of the Complainant, the Company shall provide information in writing on the complaint handling process. Depending on how the Complainant submitted the request, or how the Complainant asked in the request for the information to be provided, the information shall be provided in paper form or electronically.

3.5. If an ancillary insurance intermediary registered in the Company's register of ancillary intermediaries receives a complaint about its activities, it shall forward the received complaint to the Company within seven days.

3.6. The Company shall ensure the protection of the information provided by the Complainant and of the Complainant's personal information in accordance with the General Data Protection Regulation and the Company's information system protection procedure.

4. Complaint Handling Procedure

4.1. Within the limits of their competence and legal possibilities, the Person responsible for handling Complaints has an obligation to verify the evidence and information related to the Complaint. As part of verifying the evidence and information related to the Complaint, the Person responsible for handling Complaints shall carry out at least the following actions:

4.1.1. request explanations from the Employee and verify the information stated therein;

4.1.2. if necessary, verify the information held by the Company or by the ancillary insurance intermediary registered in the Company's register of ancillary intermediaries (if the complaint concerns an ancillary intermediary) (documents, electronically stored information, e-mail correspondence from the Company's e-mail, etc.);

4.1.3. if necessary, obtain additional details electronically from public registers and other public sources of information;

4.1.4. if necessary, request explanations or additional information from other employees of the Company or of the ancillary insurance intermediary registered in the Company's register of ancillary intermediaries (if the complaint concerns an ancillary intermediary);

4.1.5. if necessary, ask for additional information from other persons who are not employees of the Company or of the ancillary insurance intermediary registered in the Company's register of ancillary intermediaries.

4.2. The Person responsible for handling Complaints shall handle the Complaint and give a reply to it within 20 days of the date of submission of the Complaint, or, if this is not possible for objective reasons, shall provide substantiated information on the need to extend the reply period and a reasonable time limit by which the reply will be given.

4.3. The Person responsible for handling Complaints shall provide the Complainant with a substantiated reply to the received Complaint, based on a comprehensive and objective assessment of the evidence and information stated in the Complaint and obtained during the Complaint handling process, using language that is as simple and easy to understand as possible. In the reply, the Person responsible for handling Complaints shall also inform the Complainant of other options for having the Complaint examined if the reply given does not fully satisfy the claims stated in the Complaint.

4.4. The reply to the Complaint shall state whether the Company agrees or disagrees with the claims made and shall state its position regarding the grounds for the claims.

4.5. If the Company agrees with the claims made in the Complaint, it shall state in its reply letter whether and in what manner the Complainant may receive compensation for the losses incurred, if any were incurred and if those losses are directly and causally related to the conduct of the Company's employee that is the subject of the claims.

4.6. If the Company does not agree with the claims made in the Complaint, it shall state in its reply letter the facts, circumstances and documents that provide grounds for rejecting the claims made by the Complainant.

4.7. If the Company establishes that the claims made in the Complaint do not relate to the Company's activities, or that the claims made in the Complaint concern the actions of a person who is not an Employee, the Company shall inform the Complainant thereof in writing.

4.8. The reply to the received Complaint shall be given in Latvian. If the Complainant has submitted the Complaint in another language, the Company may, if this does not result in additional administrative costs, reply in the language in which the Complainant addressed it.

4.9. If a Complaint is submitted about an Employee who is themselves the Person responsible for handling Complaints, all duties of the Person responsible for handling Complaints set out in this document with respect to such Complaint shall be performed by another person appointed by the Company's Management Board to handle the specific Complaint. If a Complaint is submitted about a member of the Company's Management Board, that Board member shall not take part in any decisions related to the handling of the Complaint. If a Complaint is submitted about the sole member of the Company's Management Board who is at the same time also the Person responsible for handling Complaints, that Board member shall appoint another person to handle the specific Complaint, and these circumstances shall be stated in the reply to that Complaint. If a Complaint is submitted about the sole member of the Company's Management Board who is at the same time also the Person responsible for handling Complaints and the sole employee of the

Company, the Complaint shall be handled by the Person responsible for handling Complaints themselves, and these circumstances shall be stated in the reply to that Complaint.

4.10. After a comprehensive and objective assessment of the evidence and information stated in the Complaint and obtained during the Complaint handling process, and after drawing up the reply, the Person responsible for handling Complaints or the person specified in Clause 4.9 of this document shall carry out an analysis of the cause of the Complaint and of the measures necessary to eliminate it.

5. Register of Complaints

5.1. The Company shall register submitted Complaints no later than on the next working day after receipt of the complaint, and replies given to submitted Complaints on the day the reply is prepared. In the register of Complaints and replies, the Company shall state at least the following information:

5.1.1. information on the Complainant (for a natural person – first name and surname; for a legal person – name, registration number) and their contact details;

5.1.2. the date of receipt of the Complaint;

5.1.3. the reason for the Complaint stated in the Complaint;

5.1.4. the type of insurance;

5.1.5. the date on which the reply to the Complaint was sent;

5.1.6. the outcome of the handling of the Complaint;

5.1.7. the country in which the insurance and reinsurance distribution that is the subject of the Complaint was carried out.

5.2. The Company shall retain information on received Complaints and replies given for at least 10 years and 6 months from the date the reply to the Complaint was given. The Company shall ensure that information on received and handled Complaints is submitted to Latvijas Banka at its request.

6. Analysis and Elimination of the Causes of Complaints

6.1. At least once per reporting year, by 31 March of each year, the Person responsible for handling Complaints shall prepare a report on the compliance of the Complaint handling processes that took place in the previous calendar year with this document and on the effectiveness of the Complaint handling process, and shall also include in the report information on the analysis of the causes of Complaints referred to in Clause 4.10 of this document and on the measures necessary to eliminate those causes. The Person responsible for handling Complaints shall submit the said report to the Company’s Management Board. The Person responsible for handling Complaints shall not draw up the report referred to in this clause if no Complaint handling process took place in the previous calendar year.

6.2. Within one calendar month of receipt of the report referred to in Clause 6.1 of this document, the Company's Management Board shall examine it and assess the need to take any measures to eliminate the causes of Complaints, deciding, where necessary, to take specific measures within specific time limits. Control over the implementation of the measures necessary to eliminate the causes of Complaints shall be assigned to the Person responsible for handling Complaints, who shall inform the Company's Management Board both of the implementation of these measures and of any delays in or obstacles to their implementation, stating the reasons for the delays, the obstacles and their own recommendations for their elimination.

Questions about a complaint?

Contact the person responsible for handling complaints, Ruslans Verdens.

E-MAIL
office@marine-group.eu

PHONE
+371 20877778

ADDRESS
Bērzaunes iela 12, Rīga