



COMPLAINTS POLICY & FORM

Compliants Policy & Form last update on 01/2020.

Contents

1. Purpose.....	2
2. Types of Complaints.....	2
3. Your rights under GDPR	2
4. What will we do when we receive a complaint.	3
5. Handling complaints.....	3
COMPLAINT / Data Subjects' REQUEST FORM	5

1. Purpose

KMG Capital Markets Ltd ('KMG') is committed to handling personal data in compliance with the General Data Protection Regulation (GDPR) and any other applicable law.

2. Types of Complaints

All complaints about **KMG** processing of Personal data will be handled in line with the procedure set out below (4. Handling complaints). Non-exhaustive examples of the types of concerns likely to be raised include:

- Unfair or unlawful processing of personal data
- Misuse of your personal data
- Unauthorized access to your personal data
- Loss of your personal data.

Where a concern falls outside the scope of this complaints procedure, you will be notified of the most appropriate process to be followed.

3. Your rights under GDPR

KMG is committed to ensure protection of your rights under GDPR and any other applicable law.

Accordingly, you can request access to your Personal data. You may also request rectification of inaccurate Personal data, or to have incomplete data completed.

In addition, your right to be forgotten entitles you to request erasure of the Personal data in cases where:

- i. the data is no longer necessary in relation for the purposes of its collection or processing,
- ii. you choose to withdraw your consent,
- iii. you object to the processing by automated means using technical specifications,
- iv. your Personal data has been unlawfully processed, and
- v. there is a legal obligation to erase your Personal data, and
- vi. erasure is required to ensure compliance with applicable laws.

You may also request the restriction of processing, in cases where:

- i. you contest the accuracy of the Personal data,

- ii. **KMG** no longer needs the Personal data, for the purposes of the processing, and
- iii. you have objected to processing for legitimate reasons. Moreover, you are entitled to request and receive the Personal data concerning you.

You may also request, where applicable, the portability of your Personal data that you have provided to **KMG**, in a structured, commonly used and machine-readable format or request to transmit it to a third party of your choice.

You may object (right to “opt-out”) to the processing of your Personal data (notably to profiling or to marketing communications). When we process your Personal data on the basis of your consent, you can withdraw your consent at any time.

4. What will we do when we receive a complaint.

Our approach is to engage positively and resolve your complaint satisfactorily without you having to refer your complaint to local Court or the Cyprus Data Protection Supervisory Authority.

If you have any concerns or problems with the way in which your personal data has been processed, you should not hesitate to raise your concern with **KMG** e.g. through our **DPO**. To help us to deal with your complaint, please provide a full written explanation of your concerns by completing the Data Protection Complaint Form below.

5. Handling complaints

At the time of drafting your complaint and to allow **KMG** to deal promptly and in the most efficient manner with your complaint, you are invited to follow the following steps:

STEP 1: Complete and submit the [Complaint/Data Subject’s Request Form](#) and send it out to our Data Protection Officer (**‘DPO’**), at dpo@kmgcapitalmarkets.com

STEP 2: You will receive a communication within three (3) business day from **KMG** acknowledging receipt of your complaint.

STEP 3: Your complaint will be treated confidentially and fully investigated where necessary. During this process, you may receive additional communications from **KMG’s DPO** who will be investigating your concern. If you have not provided sufficient information in your complaint, we will let you know the further information needed to process your complaint.

STEP 4: Once the information related to your complaint is complete, we will contact you within thirty (30) days to propose a solution. This deadline may be extended in certain circumstances, depending on the nature of the complaint. If you agree with the proposed solution, we will work with you to close the matter. If you do not agree, the matter will be escalated to the **KMG’s** Board of Directors.

STEP 5: **KMG’s DPO** will take steps to resolve the matter and will contact you to propose a new solution within thirty (30) days of the escalation.

STEP 6: If the solution proposed resolves your complaint, **KMG’s DPO** will close the matter.

STEP 7: Should you remain unsatisfied with the outcome of the review by the **KMG's DPO** or you have not received an answer within the above-mentioned deadline, you may then seek further recourse by contacting your local Court or the Cyprus Data Protection Supervisory Authority.

Please note you may complain to **KMG** in Cyprus and/or to Cyprus Supervisory Authority namely Personal Data Protection Commissioner. Cyprus is the jurisdiction in which the **KMG** is responsible for the processing of your personal data.

COMPLAINT / DATA SUBJECTS' REQUEST FORM

[To be sent by email at the generic email address as indicated in the information notices and/or the privacy policies provided to you at the time of the collection of your personal data, AND to the DPO at the following email address: dpo@kmgcapitalmarkets.com]

Important Notes:

1. Please complete all sections in BLOCK Capital Letters.
2. Proof of Identity must accompany this Form.

If you believe that the processing of your Personal data by **KMG** has caused you damage or has not been processed according to the General Data Protection Regulation (GDPR) or Law 125(I)/2018, you can fill out the present Data Protection Complaint Form.

Contact Information:

Full Name	
Postal Address	
Telephone Number (including area code)	
Email Address:	

In order to help us identify systems that may contain information about you, please check the boxes below that describe your relationship with **KMG**:

- Job applicant
- Former employee or contractor
- Employee of **KMG**
- Employee family member, dependent, beneficiary or emergency contact
- Employee of **KMG** Client or business partner
- Employee of a **KMG** supplier or vendor
- Other – please describe

.....
.....

If your information may be under another name, please provide that name and reason for the change:

.....
.....

.....
.....

Please present or include a certified copy of a valid official identification documentation to allow us to verify your name and address (e.g. valid passport or identity card).

If you request to access your Personal Data or request data portability, please specify the Personal Data which is subject to the Request and confirm that they may be sent by email to the address above or, if technically feasible, to the address of a new Controller as set out below, for the Data Portability Request:

.....
.....

If you Request rectification of your Personal Data, please specify below the data to be rectified, and provide the justification for such Request:

.....
.....

If you Request that the processing of your Personal Data is restricted please specify the processing in issue, and provide the justification for such Request:

.....
.....

If you Request the erasure of your Personal Data, please specify below the Personal Data to be deleted and provide the justification for such Request:

.....
.....

If you object to the processing of your Personal Data, please specify below the Personal Data you object to us processing and provide the justification for such objection:

.....
.....

In the event of a Complaint, please include a description of your complaint, with as much detail as possible, to help **KMG** investigate and resolve the matter (e.g. nature of data concerned, reasons why you consider that there is a violation of the General Data Protection Regulation (GDPR) or any other applicable law):

.....
.....
.....
.....

*The information collected in this form is intended to enable the **KMG'S DPO** and/or **KMG's Management** to respond to your Complaint or Data Subject Request. The forms will be archived after the Complaint/Request has*

been treated for 7 years and then deleted. For any question related to this Complaint/Request Form, please send your questions at the following email address: dpo@kmgcapitalmarkets.com.