



Complaint Handling Procedure

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Prepared and owned by			
Name	Position	Date	Next review by
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Approved by		
Name/committee	Position	Date

Purpose of this document:

The purpose of this procedure is to give guidance to ensure any complaints raised by Zero's cardholders are dealt with in a timely manner and are resolved to the customer's satisfaction.

Definition of a Complaint:

The FCA defines a complaint as: ... any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service, claims management service or a redress determination, which: a) Alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and b) Relates to an activity of that respondent, or any other respondent with whom that respondent has some connection in marketing or providing financial services or products or claims management services, which comes under the jurisdiction of the Financial Ombudsman Service

Handling Complaints:

To submit a complaint to Zero the customer must send an email to help@zero.co.uk.

- 1) Complaints are to be acknowledged by Zero within 2 business days of receipt. Every possible effort will be made to respond to the complainant, on paper or on another durable medium, addressing all points raised, within an adequate timeframe and, at the latest, within 15 business days of receipt of the complaint.
- 2) If the answer cannot be given within 15 business days, for reasons beyond the control of Zero, an email is to be sent to the complainant clearly indicating the reasons for a delay in responding to the complaint and specifying the deadline by which the complainant will receive the final reply (within a further 20 business days, up to the mandatory regulatory maximum of 35 business days timeframe).
- 3) Once the 15 business days period referred in points 1 and 2 has elapsed, Zero shall notify the card issuer that a complaint has been raised, as well as the timeframe that has passed. At such time, the complainant may receive communication directly from the card issuer.
- 4) The card issuer may advise the complainant that the complaint has been escalated, as well as the expected timeline (the further 20 business days mentioned above, after the initial 15 business days have passed) for the resolution of the complaint. The complaint will be investigated and the deadline for receiving the final reply from card issuer shall not exceed 35 business days from the date the complaint was first made.

ESCALATIONS TO TRANSACT PAYMENTS

The email address for complaint escalations is complaints@transactpay.com

IMMEDIATE ESCALATION TO TRANSACT PAYMENTS

There may be cases which require direct escalation to Transact Payments' Compliance Team immediately. The following are examples of when a Complaint should be escalated. At such time the client's Customer Services Team should stop all communications with the customer unless otherwise requested by the Transact Payments Compliance Team:

- Violation of Law Complaint
- Threat of Legal Action
- Regulatory Authority or Scheme Inquiry
- Threat of Violence or Bodily Harm
- Systemic Errors impacting multiple accounts
- Consumer Protection Authority Referral
- Data Protection Breach

FURTHER ESCALATION TO THE GIBRALTAR FINANCIAL SERVICES COMMISSION (GFSC)

Should TPL be unable to resolve a customer's complaint to their satisfaction, complainants can refer their complaint to TPL's regulator, the Financial Services Commission at: Payment Service Team Gibraltar Financial Services Commission PO Box 940 Suite 3, Ground Floor Atlantic Suites Europort Avenue Gibraltar or by email at complaints@gfsc.gi.

The following information shall be provided to the GFSC:

- Cardholder name and contact details
- Whether the cardholder is complaining on their behalf or on behalf of a company
- Whether or not the cardholder is a payment service user
- The identity of the payment service provider(s) that has/have given rise to the complaint of an alleged infringement of requirement; and
- A description of the situation that gave rise to the complaint of an alleged infringement of requirement.

Before escalating a complaint to the GFSC, the cardholder must exhaust the complaints procedure at Zero and TPL first.

Once the GFSC has received a complaint from a cardholder, they will receive an acknowledgement within five working days of receipt of the complaint. The GFSC will then assess whether the complaint raises any concerns regarding possible breaches of the requirements that payment service providers must comply with.

When the GFSC contacts Transact Payments Limited about the complaint, depending on the considerations and in the involvement that Transact Payments has had, there could be 2

possible outcomes:

a) When Transact Payments just acts as a channel of information between the cardholder and the Zero, and ultimately between the Zero and the Gibraltar Financial Services Authority, the Head of Compliance will gather the information and the transaction history of the cardholder, and will provide the GFSC with a chronological report including the investigations performed and the findings.

b) When Transact Payments took active part in the resolution of the complaint via proposing or requesting prompt action or restitution from the Zero, or internally, the relevant compliance officer will prepare a report for the regulator providing explanations and justification for actions taken or the rationale for not having taken action, which must be signed off by the Head of Compliance. Complaints to the GFSC must be submitted within 12 months of the date on which the cardholder first became aware of the circumstances of the complaint. There is no charge for submitting a complaint to the GFSC.

Record Keeping

All complaints are recorded in the complaints register found [here](#). Records are to be kept for at least 5 years following the end of the relationship, the last transaction or complaint correspondence in accordance with applicable law.