

# **COMPLAINT MANAGEMENT REGULATIONS FOR HIGHDOME PCC LIMITED**

## **ARTICLE ONE**

### **OBJECT**

1 - These Regulations, henceforth “Regulations”, establish the principles adopted by HIGHDOME PCC LIMITED, henceforth “HIGHDOME”, to handle Complaints addressed to it by Policyholders, Insurees, Beneficiaries or Injured Third Parties, under the terms set out by Regulatory Norm n° 10/2009 of 25 June, amended by Regulatory Norm n° 2/2013 of 10 January.

2 - The principles in these Regulations have been approved and implemented by HIGHDOME’s governing body, which monitors compliance with the Regulations.

## **ARTICLE TWO**

### **SCOPE OF COMPLAINTS**

1 - Complaints are defined as any manifestation of disagreement with HIGHDOME’s position, or dissatisfaction with the services provided by HIGHDOME, as well as any allegation of possible noncompliance, submitted by Policyholders, Insurees, Beneficiaries or Injured Third Parties.

2 - Outside of this scope are statements forming part of the contract negotiation process, communications inherent to claims regulation processes and requests for information or clarification.

## **ARTICLE THREE**

### **SUBMISSION OF COMPLAINTS**

Policyholders, Insurees, Beneficiaries or Injured Third Parties may address their complaints to HIGHDOME via the following:

- a) By email: [celleurope@highdomepcc.com](mailto:celleurope@highdomepcc.com)
- b) By letter to the postal address: Departamento de Gestão de Reclamações da HighDome PCC Limited – Av. Boavista 1277/81, R/C, 4100-130 Porto

**ARTICLE FOUR**  
**REQUISITES FOR SUBMISSION OF COMPLAINTS**

1 - Complaints from Policyholders, Insurees, Beneficiaries or Injured Third Parties must contain all information relevant to their management and include at least the following elements:

- a) Full name of Complainant, and, if applicable, their representative;
- b) Reference to the Complainant's capacity, namely Policyholder, Insuree, Beneficiary or Injured Third Party or their representative;
- c) Contact details of Complainant, and, if applicable, their representative;
- d) Complainant's identification document number;
- e) Description of the facts giving rise to the Complaint, identifying the parties to the facts, and the date of occurrence, except if manifestly impossible;
- f) Date and place of Complaint.

2 - Should any of the elements above not be produced, HIGHDOME will request all information necessary for Complaint management.

**ARTICLE FIVE**  
**COMPLAINT MANAGEMENT**

1 - The Complaint Management Department will quickly, efficiently and impartially analyse the Complaints submitted correctly per the terms of the article above, ensuring that Complaints are answered in a comprehensive and reasoned manner within 20 days, or within a 30-day response time for especially complex situations.

2 - Complaints will not be accepted if:

- a) Essential information is omitted so that Complaint management is not viable and/or essential information has not been corrected per the terms of paragraph 2, Article Four;
- b) Complainant seeks to bring a Complaint on matters under the purview of arbiters, mediators or court authorities or when the object of the Complaint has already been settled by those entities;
- c) Complaint reiterates other Complaints brought by the same Complainant regarding the same matter and it has already been answered by HIGHDOME;
- d) Complaint has not been brought in good faith or its content has been deemed vexatious.

3 - The management of Complaints does not represent any cost or burden to the Complainant, nor any onus that isn't effectively indispensable to the management of the pertinent Complaint.

**ARTICLE SIX**  
**CUSTOMER'S OMBUDSMAN**

1 - Only Complaints that have already been assessed by the Complaint Management Department at HIGHDOME can be addressed to the Ombudsman, and that have not been answered within the time indicated on paragraph 1, Article Five, or Complaints that have been answered, if the Complainant disagrees with the answer.

2 - Complaints indicated on paragraph 1 above must be addressed to: Provedor do Cliente da HighDome PCC Limited – Avenida Miguel Bombarda 35, 1050-161 Lisboa, Portugal

Telephone: +351213169500; Mobile: +351968161815

Email: [augustodeathayde@gmail.com](mailto:augustodeathayde@gmail.com); and [aaa@augustodeathaydeassociados.pt](mailto:aaa@augustodeathaydeassociados.pt)

3 - The Ombudsman will assess the Complaints submitted by Policyholders, Insurees, Beneficiaries or Injured Third Parties within at most 30 days counting from the date of reception, with a maximum time extension to 45 days in especially complex cases.

4 - Whenever the Ombudsman is made aware that the subject matter of the Complaint is in litigation through arbitration or court procedures, the Ombudsman may refrain from continuing its assessment.

5 - The assessment of Complaints by the Ombudsman does not interfere with the right to resort to courts of law or the right to submit complaints to the Autoridade de Supervisão de Seguros e Fundos de Pensões (Supervisory Bureau for Insurance and Pension Funds), with offices at Av. da República, 76 - 1600-205 Lisboa, Portugal.