



PRIVACY AND COMPLAINT HANDLING

POLICY

2024

HORIZON

REMITANCE LTD

Company No: 08122834

FCA Reg No: 590039

HMRC Reg No: XTML00000130099

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UNITED KINGDOM

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Introduction

At Horizon Remittance Ltd (*hereinafter referred to as 'HorizonRemit'*), we prioritise the privacy and satisfaction of our customers while delivering reliable money remittance services from the UK to various countries worldwide. As a company regulated by the Financial Conduct Authority (FCA) and Her Majesty's Revenue and Customs (HMRC), we adhere to strict standards to ensure the security and confidentiality of our customer's personal information.

This Privacy and Complaint Handling Policy outlines our commitment to protecting customer privacy and addressing any concerns or complaints they may have regarding our services. It covers the collection, use, disclosure, and protection of customer personal data in accordance with applicable laws and regulations, including the General Data Protection Regulation (GDPR).

Additionally, this policy provides guidance on how to lodge complaints, escalate issues to the Financial Ombudsman Service (FOS), and ensure timely resolution of disputes. We value customer trust and are dedicated to maintaining transparency, accountability, and excellence in all aspects of our operations.

Definitions and Key Terms

Cookie: A small amount of data generated on the customer's device by the web browser while browsing a website.

Company: When this policy mentions "Company", "we", "us", or "our", it refers to Horizon Remittance Ltd, which is responsible for customer information under this policy.

Country: Refers to the United Kingdom or any other country where HorizonRemit operates.

Customer: An individual registered within the system of HorizonRemit, or any of its agents.

Device: Any device used to access the services provided by HorizonRemit, including but not limited to computers, smartphones, and other electronic devices.

IP address: An Internet Protocol address assigned to each device connected to a computer network that uses the Internet Protocol for communication.

Personnel: Employees, agents, or other individuals working on behalf of HorizonRemit.

Personal Data: Any information relating to an identified or identifiable individual.

Service: Refers to the money transfer services provided by HorizonRemit.

Third-Party Service: Services provided by third-party providers that are integrated with or used in conjunction with HorizonRemit's services.

Website: Refers to HorizonRemit's website.

Financial Ombudsman Services: Independent authority for resolving financial disputes.

Complaint: A customer's request related to the improper performance of a service.

Financial Conduct Authority: The regulatory body overseeing the financial sector within the United Kingdom, responsible for supervision and regulation.

Complaint resolution: The process of addressing and resolving customer complaints efficiently and satisfactorily.

Escalation process: The procedure for transferring complaints to higher levels of authority for further investigation and resolution.

Customer satisfaction: The measure of a customer's contentment or fulfilment with the services provided by an organisation.

General Manager/Customer Service Manager: Elmuiz Mohammed Elamin, who is responsible for setting standards for complaint handling, supervising the customer service team, handling complaints, and updating policy as per compliance requirements.

Customer Service Team/Customer Service Assistants: Omar Nasreldin Hamad Mohamed and Ragad Magdi Hassan Mohd Nour, who are the initial contact point for customers, registering complaints in the system, addressing complaints, and responding to customer appeals.

Director: Abdirashid Hussein Ali, responsible for setting direction, strategy, and making financial decisions related to complaints.

Data Protection Officer: Elmuiz Mohammed Elamin, responsible for compliance with data protection laws and regulations, oversees the implementation of data protection policies and procedures and acts as a point of contact for data subjects and regulatory authorities regarding privacy matters.

Scope of application

This Privacy and Complaint Handling Policy applies to all customers and end customers of HorizonRemit who utilise our money remittance services.

The Privacy Policy governs the collection, use, disclosure, and protection of personal information in accordance with the business model and regulatory requirements of the Financial Conduct Authority (FCA) and Her Majesty's Revenue and Customs (HMRC) in the United Kingdom.

The Complaint Handling Policy covers complaints related to any aspect of our money remittance services, including but not limited to:

- Transaction processing errors
- Delays in processing transfers
- Issues with currency conversion rates
- Discrepancies in transaction fees or charges
- Poor customer service experience
- Miscommunication or misinformation provided by staff
- Security concerns or fraudulent activity
- Any other matter related to the provision of our money transfer services

This policy applies to complaints received through various channels, including in-person interactions at our branch location, telephone calls to our helpline, emails sent to our designated email address, and messages received on our social media accounts. All complaints falling within the defined scope will be handled in accordance with the procedures outlined in this Complaint Handling Policy to ensure fair, efficient, and timely resolution for our customers.

Information Automatically Collected

When the customer interacts with our website or uses our services, certain information may be automatically collected to enhance customer customer experience and improve the quality of our services. This information includes:

- **IP Address:** Customer IP address is automatically logged when they access our website or use our services. This information helps us diagnose server issues, analyse trends, and administer the website effectively.
- **Device Information:** We collect information about the device customers use to access our services, such as the type of device, operating system, browser type, and screen resolution. This helps us optimize our website and services for different devices and platforms.
- **Cookies and Similar Technologies:** We use cookies and similar technologies to track customer interactions with our website, remember customer preferences, and analyse website usage patterns. Cookies also help us personalise customer experience and provide targeted

advertising. Customers can manage cookies through their browser settings or opt out of targeted advertising.

How Do We Use the Information We Collect

The information we collect is used for various purposes to improve our services, enhance customer experience, and comply with legal obligations. Specifically, we may use the information for the following purposes:

- **Service Provision:** We use the information to provide and maintain our services, process transactions, and fulfil customer requests.
- **Personalization:** We may use the information to personalise customer experience, tailor our services to customer preferences, and provide targeted content and advertising.
- **Analytics:** We analyse the information collected to understand customer behaviour, trends, and preferences, which helps us improve the quality and performance of our services.
- **Security:** We use the information to detect and prevent fraudulent activities, unauthorised access, and security breaches, ensuring the integrity and security of our systems and data.
- **Compliance:** We may use the information to comply with legal and regulatory requirements, including anti-money laundering (AML) and know your customer (KYC) regulations, as well as tax reporting obligations.

Where and When Is Information Collected from Customers and End Customers

Information is collected from customers and end customers at various points of interaction with our website and services, including:

- **Registration:** When customers register for an account on our mobile app, we collect personal information such as name, email address, contact details, and identification documents.
- **Transaction Processing:** When customers initiate a money transfer or other transactions through our services, we collect transaction-related information, including sender and recipient details, transaction amounts, and payment methods.
- **Customer Support:** When customers contact our customer support team for assistance or inquiries, we collect information about the interactions with our support representatives and the nature of the request.
- **Website Usage:** Information is collected automatically when customers visit our website or use our services, including IP address, device information, browsing behaviour, and interactions with our website features and content.

- **Communication:** When customers communicate with us via email, phone, or other channels, we collect information related to the communication, such as the content of the messages and communication history.
- **Third-Party Sources:** We also collect information from third-party sources, such as identity verification services, to verify customer identity, prevent fraud, and comply with legal requirements.

Could Customer Information Be Transferred to Other Countries

Customer information may be transferred to countries outside the United Kingdom as part of our normal business operations and service delivery. These transfers may be necessary for the performance of our contractual obligations, compliance with legal requirements, or other legitimate purposes. When transferring customer information to other countries, we take appropriate measures to ensure that customer data is protected in accordance with applicable data protection laws and regulations. These measures include implementing data transfer agreements, using encryption technologies, or obtaining customer's explicit consent where required.

Is the Information Collected Through Our Service Secure

We take the security of customer information seriously and employ a range of technical, organisational, and procedural measures to safeguard customer data against unauthorised access, disclosure, alteration, or destruction. Our security measures include:

- **Encryption:** We use encryption technologies to secure the transmission of data between customer device and our servers, protecting customer information from interception by unauthorised parties.
- **Access Controls:** We restrict access to customer information to authorised personnel who have a legitimate need to access it for the performance of their duties.
- **Data Minimisation:** We collect and retain only the minimum amount of information necessary to provide our services and fulfil our legal obligations.
- **Regular Security Audits:** We conduct regular security audits and assessments to identify and address potential vulnerabilities in our systems and processes.
- **Employee Training:** We provide ongoing training and awareness programs to our employees to ensure they understand their responsibilities for protecting your information and complying with our security policies.

Despite our best efforts, no method of transmission over the internet or electronic storage is completely secure. Therefore, we continuously monitor and update our security measures to adapt to new threats and vulnerabilities, ensuring the ongoing protection of customer data.

Can Customers Update or Correct their Information

Customers have the right to access, update, or correct the personal information we hold about them. If they believe that any of the information we have is inaccurate, incomplete, or outdated, they can request to update or correct it by contacting our customer support team. We promptly review the request and take appropriate action to ensure that customer information is accurate and up-to-date.

Additionally, if customers have any concerns about the accuracy or completeness of the information, or if they believe that we are not complying with applicable data protection laws, they can contact our Data Protection Officer to file a complaint or request further assistance. We are committed to addressing all concerns and ensuring the accuracy and integrity of customer's personal information.

How Long Do We Keep Customer Information

We retain customer data only for as long as necessary to fulfil the purposes for which it was collected, for a period of 5 years in general. The specific retention period for customer data may vary depending on the nature of the information, the purposes for which it was collected, and legal or regulatory requirements.

Typically, we will retain customer data for the duration of customer relationship with us as a customer, and for a reasonable period thereafter to comply with legal obligations, resolve disputes, and enforce our agreements. This includes retaining transaction records, account information, and communication history for a certain period of time following the termination of your account or the completion of a transaction.

If the customer has provided consent for the processing of their information for specific purposes, we will retain the information until the customer withdraws consent or until the purpose for which it was collected has been fulfilled.

After the retention period expires, we securely delete or anonymise your information in accordance with our data retention policies and procedures, unless we are required by law to retain it for a longer period or if there are legitimate reasons for retaining it.

Sale of Business

In the event of a sale or transfer of our business, including a merger, acquisition, or other change in control, customer information may be transferred as part of the transaction. This may include the transfer of personal information collected from customers and end customers, as well as other data and assets related to our business operations.

If such a sale or transfer occurs, we will take reasonable steps to ensure that the new owner or successor entity continues to uphold the commitments and obligations outlined in this Privacy and Complaint Handling Policy regarding the protection and use of your personal information. We will also notify customers of any changes to the ownership or control of their information as required by applicable laws and regulations.

It is important to note that in the event of a sale or transfer of our business, customers' rights regarding the use and protection of their personal information will remain subject to the terms and conditions unless otherwise notified or required by law. We are committed to ensuring the continued privacy and security of customer information, even in the event of changes to our business ownership or structure.

Affiliates

Our affiliates include companies or entities that are closely related to HorizonRemit, such as agents. These affiliates share common branding, business operations, and strategic partnerships with HorizonRemit. In some cases, we may share customer information with our affiliates for various purposes, such as marketing, operational support, or compliance with legal requirements.

When sharing information with affiliates, we ensure that they adhere to the same standards of privacy and data protection as outlined in this policy. This means that affiliates are required to use customer information only for the purposes specified, and they are prohibited from disclosing or using the information for any other unauthorized purposes.

Additionally, we may enter into agreements or arrangements with affiliates to provide certain services or support functions on our behalf. In such cases, we ensure that appropriate safeguards are in place to protect the confidentiality and security of customer information, and we remain accountable for any processing of information carried out by our affiliates on our behalf.

It's important to note that while we may share information with affiliates for legitimate business purposes, we do not sell or rent customer information to third parties for marketing purposes without customers' explicit consent. We are committed to maintaining the confidentiality and security of customer information and ensuring that it is used responsibly and in accordance with applicable laws and regulations.

Governing Law

The governing law specifies the rules and regulations that govern the interpretation, validity, and enforcement of the Privacy and Complaint Handling Policy. For HorizonRemit, the governing law is determined based on the jurisdiction in which the company is registered and operates, as well as the location of its customers and end customers. In this case, as a UK-based money remittance firm supervised by the Financial Conduct Authority (FCA) and Her Majesty's Revenue and Customs (HMRC), the governing law would primarily be the laws and regulations of the United Kingdom. This includes:

- **Data Protection Laws:** The processing of personal data is governed by data protection laws in the UK, including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
- **Financial Regulations:** As a financial services provider, HorizonRemit is subject to regulations and guidelines issued by regulatory authorities such as the Financial Conduct Authority (FCA) and Her Majesty's Revenue and Customs (HMRC) in the UK.
- **Consumer Protection Laws:** The rights and obligations of HorizonRemit and its customers are governed by consumer protection laws in the UK, including the Consumer Rights Act 2015.

It's important to note that while the governing laws are primarily based on the laws of the United Kingdom, certain provisions of the policy may also be subject to laws and regulations in other jurisdictions, such as where the beneficiaries of customers are located. In such cases, HorizonRemit will comply with applicable laws and regulations to the extent required by law.

Complaint Handling Procedure

- Customers can lodge complaints through various channels including in-person, telephone, email, post, or website.
- Complaints are acknowledged immediately upon receipt, and investigations commence promptly.
- Progress updates are provided to complainants, with additional time granted if necessary.
- Final responses are communicated to complainants via their preferred method of contact.
- The complaints procedure is communicated to all agents, and customers can access it in-person at branch.

COMPLAINT HANDLING POLICY

Complainant	Point of Contact
Walk-in customer of the main branch	Head Office
Walk-in customer of any agent location	Head Office or agent location
Online customer	Customer Service team or Head Office
Walk-in customer corresponding pay-out agent	Customer Service team or Head Office
Agent	Head Office
Corresponding pay-out bank/agent	Head Office

HorizonRemit will take the following steps to resolve the complaint:

- Acknowledgement:** HorizonRemit begin the process of investigation immediately after receiving a complaint and respond within 2-3 working days.
- Progress update:** When a customer files a complaint, the Customer Service Team registers the complaint in the system. In most cases, a complaint is resolved in 15 business days (Ref – FCA Disp 1.6.2a). If additional time is needed for reasons beyond its control, HorizonRemit informs the customer indicating the reasons and specifying a final deadline, which should not exceed 35 business days where possible. HorizonRemit may also request further information or documents from the customer that may help expedite the investigation.
- Final response:** Upon completion of the investigation, HorizonRemit communicates the final decision via the complainant's preferred method (phone or sms or email or post), unless the regulation requires any specific method of communication.

Complaints Handling Etiquette *(We follow these principles while interacting with complainants):*

DOs:

- Introduce ourselves clearly.
- Take time to understand fully the issues raised in the complaint.
- Seek a speedy resolution with minimal disruption.
- Assess and investigate complaints fairly, consistently, and impartially.
- Use feedback from complaints to improve our services.
- Take all complaints seriously and use the experience to enhance our operations.
- Ensure clear communication using plain language.

DON'Ts:

- Argue with the complainant.
- Bury or ignore complaints; refer them to the appropriate channels.
- Make it difficult for customers to make complaints.
- Pass the customer around different departments.
- Tolerate verbal abuse, threats, or violence.
- Ask customers to complain later in writing or in-person.
- Take complaints as personal criticism.

How to lodge a complaint by a customer

Customers can report complaints through multiple channels, providing necessary details for investigation. Details required include the complainant's information, transaction details, nature of the complaint, and preferred contact method.

Customers may not always explicitly label their concerns as "complaints." It falls upon the company to discern expressions of dissatisfaction and address them accordingly. Customers are afforded various avenues through which they can voice their concerns regarding our services. These avenues include

- Claim in-person at the Head Office: *115 Uxbridge Road, London, England, W12 8NL*.
- Telephone call: *+4402085787786*
- E-mail application to customer service email: info@HorizonRemittance.com
- Entry by post to *115 Uxbridge Road, London, England, W12 8NL*

Details required from the complainant during a telephone or face-to-face complaint:

- Date report made
- Person receiving the report and their job role and contact details
- Full name and address of the complainant
- Daytime telephone number and preferred contact time for the complainant
- Transaction number if available
- Agent name if known
- Details of the complaint including the date and amount
- Preferred method of contact - post, email, or phone

Referral to the Financial Ombudsman Service (FOS)

If the complainant is not satisfied with our final decision, they have the right to refer the complaint to the Financial Ombudsman Service (FOS) within six months of our final response. The FOS provides an independent dispute resolution service for financial services. Contact details for the FOS are as follows:

- Address: The Financial Ombudsman Service, Exchange Tower, London, E14 9SR
- Email: complaint.info@financial-ombudsman.org.uk
- Telephone: 0300 123 9 123 (Monday to Friday, 8 am to 5 pm)
- Online: www.financial-ombudsman.org.uk

Handling of Complaints

Upon receipt of a complaint, we initiate contact with the customer through a direct phone call as our primary communication channel. Should the initial attempt be unsuccessful, customer service personnel leave a voicemail, urging the customer to connect with us, stating, "Please contact us regarding complaint no..... Greetings Horizon Remittance Ltd."

Subsequently, we employ a multi-channel approach, sending a text message to the customer, similarly requesting them to engage with us concerning their complaint.

If no response is received within 24 hours or after 3 unsuccessful attempts, we escalate our communication by sending an email with the same message as before. Concurrently, we persist in attempting to reach the customer via phone.

In the event that contact remains unestablished within a week of the initial attempt, we dispatch a formal complaint letter to the customer, urging them to respond.

Should no communication be established within 30 days from the dispatch of the complaint letter, we formally close the complaint. Simultaneously, a notification is sent via text message and letter to the address provided in our system, stating, "Today we are closing the complaint number....".

Customers dissatisfied with the resolution of their complaint have the option to appeal our decision to the Financial Ombudsman Services (details attached above).

Analysis of the most common reasons for complaints

We do monthly analyses of common complaints to identify trends and implement corrective measures. Immediate action is taken to mitigate recurring issues, including changes in operational procedures or system enhancements.

Once a month, the Customer Service Manager analyses the most common reasons for complaints. The results are included in a report which is submitted to the Director. For the most common complaint reason, a plan is created to mitigate the risk associated with the occurrence of the mentioned situation and corrective measures are implemented as soon as possible.

Procedure for resolving mistakes made by employees

In the event of a mistake made by an employee of HorizonRemit, resulting in sending funds to the wrong account of the recipient, the Director, based on the recommendation of the Customer Service Manager (which is created based on the analysis of the customer's history and the situation under consideration), considers the return of funds to the customer's bank account before receiving the funds from the banking procedure. This means a prepayment from the company's funds, towards possible losses of the customer, due to the long wait for the return of the customer's funds from the banking procedure.

In the case of an employee who made a mistake, depending on the scale of the violation, a disciplinary penalty is imposed as defined in the Labour Code. In parallel with the disciplinary penalty, the Customer Service Manager takes steps to minimise the possibility of this error occurring in the future. This includes refresher training on procedures if there is a need to change the procedure and/or technical changes to the system to avoid errors due to the human factor.

Protocol for Managing Unclaimed Funds

In accordance with our customer complaints policy, we will make multiple attempts to establish contact with the beneficiary owner of the fund using various means of communication. This includes phone calls, emails, and written correspondence. We will strive to reach out to the beneficiary owner a minimum of three times within a specified period, typically over one month.

If, after exhausting all reasonable efforts, we are unable to establish contact with the beneficiary owner, the account may be designated as an 'Unclaimed Fund'. However, before taking such action, we will hold the funds for 12 months, during which any interest earned will also be accrued.

After the 12-month holding period, if contact remains unestablished and no response is received from the beneficiary owner, we will transfer the funds to a different account as per our internal procedures.

Internal Reporting

Quarterly statistics on complaint status are shared with the Director for oversight and decision-making.

Escalation Process Based on Complaint Nature

Complaints are directed to different personnel based on the nature of the issue to ensure efficient resolution. Complaints related to beneficiary payments are promptly addressed by the Customer Service Manager. General complaints are initially handled by the Customer Service Team. If necessary, issues will be escalated to the Director for further investigation, ensuring compliance with regulations and standards.

Changes to the Policy

At HorizonRemit, we understand the importance of transparency and accountability in our data-handling practices. Therefore, we reserve the right to update or modify this Privacy and Complaint Handling Policy periodically to reflect changes in our business operations, legal requirements, or industry standards. These changes may occur without prior notice, but we are committed to notifying our customers of any material updates or amendments to the policy through our website or other communication channels. It is important for customers to review this policy regularly to stay informed about how we collect, use, disclose, and protect their personal information. By continuing to use our services after the posting of any updates or amendments to this policy, customers signify their acceptance of those changes. However, if a customer disagrees with any aspect of the updated policy, they have the right to discontinue their use of our services and request the deletion of their personal information as outlined in this policy. We are dedicated to maintaining transparency and providing clear and accessible information about our data handling practices. Customers are encouraged to reach out to us with any questions or concerns they may have about this policy or our privacy practices, and we will be happy to assist them.