

Startup Direct Complaints Policy

The below information sets out the complaints process to be followed by third parties of Startup Direct who believe they have a grievance with Startup Direct or its partners.

Formal definition of a complaint that would be considered for investigation: The Financial Conduct Authority (FCA) define a complaint as *'an expression of dissatisfaction with a product / service that calls for a response'*.

Startup Direct is committed to ensuring that all complaints are investigated fully and impartially and with due consideration for confidentiality. Our complaints policy is clear and transparent and we aim to treat customers fairly.

How Can I Submit My Complaint?

Once a customer has expressed that they wish to make a formal complaint, they will be asked to put their complaint in writing and post or email it to the following details:

By email to: apply@startupdirect.org

By post to:

We Work

C/o Investigation Officer

Startup Direct

14 Gray's Inn Road

WC1X 8HN

Or alternatively, by telephone: 020 3126 4957

Any complaint made under this policy should include:

- Contact details of the Complainant (including postal and e-mail address).
- The subject of the complaint.
- Information and evidence regarding the alleged breach.

Anonymous complaints will not normally be accepted but may be investigated where possible and will be acted upon at the Company's discretion.

Complaints should also be made within three months of the Complainant becoming aware of the grounds for a complaint.

How We Will Handle Complaints

As soon as a complaint has been received, we will aim to acknowledge receipt within 3 working days. We will also clearly state that a final response will be communicated to the Complainant within 8 weeks from receipt of the complaint. A date will be given in the acknowledgment.

If the details of the complaint are not clear and concise and there is ambiguity about what the subject matter is, the Complainant will be asked to clarify the points of their complaint before the investigation can start.

At this stage, we will also ask the Complainant to provide any supporting evidence they wish us to take into consideration when investigating the complaint.

Where the customer is making a Subject Access Request (SAR), as part of their complaint. This will be treated in accordance with the Information Commissioner's Officer Guidelines.

We will promptly acknowledge and fulfil the request within 8 weeks.

Where a customer is in arrears and the loan has been outsourced to an external agency to collect, any complaint made here will be dealt with by the Start Up Loans Company and the complaint will be forwarded to SULCo.

Resolving Complaints

Formal Response:

The complaint will be handled by one of the Investigating Officers and any further evidence submitted by the complainant will be taken on board during the investigation.

Once a complaint has been fully investigated, a formal response will be communicated to the Complainant. The Complainant will also be advised that they have the right to approach the Financial Ombudsman (FOS) and register their complaint regardless of the outcome with Startup Direct.

All the evidence provided by the Complainant and any other relevant party (e.g. Partner) will be considered. The outcome will then be communicated to the complainant within 8 weeks of their initial complaint.

The Complainant will be given the chance to progress their complaint to the Start Up Loans Company if they are not satisfied with the decision in our formal response by emailing the Customer Services mailbox: customerservices@startuploans.co.uk.

FOS

The Financial Ombudsman Service will accept any complaint that has been through our formal complaints process as long as the Complainant registers their complaint within 6 months of the date of our response. This could be either at stage 1 or stage 2 of our process.

Additional Information

The above procedure seeks to create a positive approach to complaints and treat customers fairly. The complaints policy will be published on a publicly accessible website – www.startupdirect.org

Startup Direct will keep copies of documents generated as a result of the complaint and record of any action taken. Except where prohibited or protected by applicable law, the finding of the complaint will be made available to a Competent Authority e.g. Financial Ombudsman Service (FOS) on request.

Complaint records will be kept on file for a three year period in order to comply with the FCA requirements.

Startup Direct will co-operate with any official investigations and request for information from the relevant authorities.

Startup Direct will take appropriate disciplinary action in the case of finding such a violation or unlawful behaviour.

The procedure does not confer any contractual rights. The Policy and Procedure may be subject to revision from time to time.

Startup Direct will not reimburse any fees, expenses or cost involved in bringing a complaint to our attention.

We are providing a free service for customers to register their complaint.

Complaints Not Covered By The Policy

This complaints policy cannot be used to deal with an issue which is part of any legal action against Startup Direct.

This complaints policy cannot be used by an employee. Any specific complaints made by employees should be directed through the relevant internal grievance policy and procedure.

Startup Direct reserves the right to take any appropriate action to protect itself from any unfounded, malicious or vexatious allegations or complaints. Untrue allegations could lead to legal action for defamation.

Nothing in this policy should be interpreted to restrict any rights of redress the Complainant has in law.