

## Complaint Management Policy

### 1. Purpose of the Complaint Management Policy:

The purpose of the following policy is to satisfy and efficiently manage the complaint handling needs of guests at Sea Pension (See Immo Kft. Headquarters: 9400 Sopron, Mikoviny Street 17.).

### 2. Principles of the Policy:

- **Principle of thorough investigation and response to complaints:** Sea Pension is committed to thoroughly investigating and responding to all complaints.
- **Principle of guest satisfaction:** The highest priority for Sea Pension is to ensure that guests are always satisfied with the services provided. Complaints should be impartially and thoroughly investigated and responded to according to this policy.
- This policy does not cover the handling of notifications that are not classified as complaints.

### 3. Scope of the Policy:

3.1. **Personal Scope:** This policy applies to all employees working at Sea Pension, who are obliged to familiarize themselves with the provisions of this policy and are personally responsible for compliance.

3.2. **Material Scope:** The policy covers activities related to the reporting and handling of complaints.

#### 3.3. Detailed Provisions:

3.3.1. **Complaint:** A complaint is any objection against the services or omissions of Sea Pension, in which the guest requests the pension's action. Requests for general information, opinions, or statements from the pension do not constitute a complaint.

3.3.2. **Complainant:** A complainant can be any person considered a consumer under Act CLV of 1997 on Consumer Protection, who has used Sea Pension's services or is a recipient of commercial communication or offers related to the services of the pension.

#### 3.3.3. Methods and Locations for Filing Complaints:

- **Oral Complaint:** In person at the location or via telephone at +36302602047

- **Written Complaint:**

- In person by entering it in the complaint book at the pension's reception

- By mail to: See Immo Kft., 9400 Sopron, Mikoviny Street 17.

- By email to: info@seeimmo.hu

3.3.4. **Complaint Handling Deadlines:** The receptionist of the pension immediately examines and, if necessary, remedies oral complaints. If the complainant disagrees with the handling of the complaint, or if immediate investigation is not possible, a record must be taken of the complaint and the related standpoint, and a copy must be provided to the consumer in case of personally communicated oral complaints, or sent within 30 days in case of telephone complaints. Oral complaints via telephone or electronic communication services are assigned a unique identification number. When recording the complaint, Sea Pension records at least the following data: - Name, address (headquarters), mailing address of the complainant - Place, time, and method of the complaint submission - Detailed description of the complaint, list of documents and other evidence presented by the complainant - Sea Pension's statement regarding

the complaint if immediate investigation is possible - Signature of the person recording the complaint and the consumer, except in the case of complaints made via telephone or other electronic communication services - Place, time of the record - Unique identification number of the oral complaint made via telephone or other electronic communication services. For identification and effective handling of the case, the following data may be requested from the customer: - Name, address (headquarters), mailing address, phone number, preferred method of notification, and valid authorization in case of an authorized client

**3.3.5. Handling of Complaints:** Sea Pension records every complaint, paying particular attention to the protection of personal data. The requested personal data is solely for identification purposes and may not be used for any other data collection purposes. The data of the customer submitting the complaint must be handled in accordance with the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information. **Responsibility for Complaint**

**Handling:** The following individuals are authorized to handle complaints based on Sea Pension's complaint management system and processes: - Managing Director

**3.3.6. Investigation of the Complaint:** The complaint is investigated considering all relevant circumstances.

**3.3.7 Communication of the Decision Regarding the Complaint:** Sea Pension is obliged to respond in writing to the written complaint within 30 days of its receipt, unless a directly applicable legal act of the European Union provides otherwise. Shorter deadlines may be set by law, and longer deadlines may be established by law. Any position rejecting the complaint must be justified.

**3.3.8.** If Sea Pension's complaint handling is not satisfactory to the complainant, or if the pension rejects the complaint, the complainant may initiate the free procedure of the Conciliation Bodies with territorial jurisdiction. The consumer, defined by the law, can initiate the procedure at the Conciliation Body operating beside the competent county chamber of commerce according to the consumer's place of residence or the place of the service provider's activity. The list of county organizations is available at <https://bekeltetes.hu/>.

In its information provided to the complainant, Sea Pension indicates the contact details of the competent authority, as well as the headquarters, telephone and internet contact details, and mailing address of the conciliation body competent for the complainant's place of residence or stay. Sea Pension has not made a general submission declaration. The complainant may also turn to the courts. If Sea Pension violated the consumer rights during the complaint handling process (such as not responding timely or appropriately to the complaint, misleading the consumer, or committing other consumer protection violations), the consumer can contact the district office competent for their place of residence. The contact details of district offices are available at <https://kormanyhivatalok.hu/>.

4. **Record Keeping of Complaints:** Sea Pension keeps records of received complaints according to unified principles. The records are designed to clearly indicate the date of response. The records are capable of identifying the facts causing the complaint, correcting and summarizing the identified facts and events. Sea Pension is obliged to keep a copy of the complaint (the recorded complaint) and the response for three years and to present it to the supervisory authorities upon request. 4.1 Complaints with identical content to previously answered complaints, repeated by the same consumer without new information, and consumer complaints submitted by unidentifiable persons may be omitted from investigation.

5. **Final Provisions:** The handling of guest complaints is governed by this Policy, Act CLV of 1997 on Consumer Protection, and Act V of 2013 on the Civil Code.
6. **Effective Date:** This Policy shall apply from January 1, 2023, until its withdrawal.

Issued in: Fertőrákos, January 1, 2023 Henrietta Kovács, Managing Director