Collinson Insurance Europe Limited

Customer Treatment Policy

Collinson Insurance

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Collinson Insurance Europe Limited (“**CIEL**”) is a specialist insurer operating within niche segments of the general insurance personal lines market across Europe. CIEL writes travel, international private medical, dental, as well as specialist and ancillary personal lines insurance products, distributed via sophisticated affinity partner brands.

Our vision is to provide protection and peace of mind in the best interest of customers so they can enjoy their experiences and look after their health and personal possessions. In order to achieve this, we are committed to providing insurance products and services that are fair, transparent, accessible and responsive to the needs of our customers.

This Customer Treatment Policy sets out the standards of service that our customers can expect from us and the commitments that guide every interaction.

1. Fairness, diligence and transparency

We are committed to treating all customers fairly, honestly, and professionally throughout the entire customer journey. We regularly assess the outcomes achieved for our customers to help ensure that our products and services continue to meet their needs, deliver fair value and support positive customer outcomes at every stage of their relationship with us.

We aim to:

- Act in good faith and in the best interests of our customers.
- Conduct our business with fairness, integrity, and due care.
- Ensure that our communications are clear, accurate, and not misleading.
- Make decisions objectively and consistently.
- Provide all the necessary documents about our products and services in a transparent manner.
- Seek to deliver fair customer outcomes at every stage of the relationship.

Our commitment to fairness extends from product design and distribution to claims management and complaints handling.

2. Customer information and product suitability

Customers should be provided with the information they need prior to purchasing their insurance cover to make informed decisions. In order to ensure this, we aim to:

- Provide information that is clear, accurate, complete, and understandable.
- Provide documentation that explains the main features, benefits, limitations, exclusions, and risks associated with our products.
- Respond to requests for information and clarification in a timely manner.
- Support customers in understanding their rights and obligations under their insurance contracts.

Take reasonable steps to ensure that products offered are appropriate for the identified needs of the customers and target markets for which they have been designed.

We encourage customers to ask questions whenever additional clarification is required.

3. Personal data

We recognise the importance of protecting personal information and maintaining customer trust.

We are committed to:

- Processing personal data lawfully, fairly, and transparently.
- Collecting only the information necessary for legitimate business purposes.
- Maintaining appropriate technical and organisational safeguards to protect personal data.
- Respecting the privacy rights of our customers.
- Limiting access to personal information to authorised individuals who require it for legitimate business purposes.
- Retaining personal data only for as long as necessary and in accordance with legal and regulatory requirements.
- Providing clear information regarding how personal data is collected, used, shared, and protected.

Further details regarding our processing of personal data can be found in our Privacy Notice referenced in the policy wording.

4. Prevention and management of conflicts of interest

We are committed to identifying, preventing, managing, and, where necessary, disclosing conflicts of interest that may arise in the course of our business.

We will:

- Maintain policies and procedures designed to identify actual, potential, and perceived conflicts of interest.
- Take reasonable measures to prevent conflicts from adversely affecting customer interests.
- Ensure that business decisions are made objectively and independently.
- Place customers' interests at the centre of our decision-making processes.
- Implement controls and governance arrangements designed to manage conflicts appropriately.
- Provide disclosure where a conflict of interest cannot be effectively avoided and where disclosure is required by law or regulation.

Our objective is to ensure that customers can have confidence that their interests are treated fairly and are not compromised by competing considerations.

5. Speed and efficiency

We are committed to delivering a responsive and efficient service.

We aim to:

- Handle enquiries, requests, claims, and complaints promptly and professionally.
- Seek to minimise unnecessary delays and administrative burdens.
- Keep customers informed regarding the status of requests and claims.
- Continuously improve our systems, processes, and customer service capabilities.
- Use technology and digital solutions responsibly to enhance customer experience and accessibility.

Where circumstances outside our control result in delays, we will endeavour to keep customers informed and provide regular updates.

6. Training and competence

We recognise that a high standard of customer service depends upon the competence and professionalism of our employees and representatives.

We will:

- Ensure that employees and representatives possess the knowledge, skills, and experience necessary to perform their roles effectively.
- Provide ongoing training and professional development.
- Promote awareness of legal, regulatory, ethical, and customer service obligations.
- Maintain standards of professional conduct and accountability.
- Monitor competence through appropriate oversight, supervision, and performance management processes.
- Foster a culture of continuous learning and customer-centric decision-making.

Our customers can expect to deal with individuals who are suitably trained and equipped to provide accurate and reliable assistance.

7. Target market for the products

We are committed to designing and distributing insurance products that meet the needs, characteristics, and objectives of the customers for whom they are intended.

We will:

- Define and regularly review the target market for each insurance product.
- Assess whether products continue to provide value and meet customer needs.
- Provide distributors and business partners with appropriate information regarding product features and target market suitability.
- Monitor product performance and customer outcomes.

- Take corrective action where products are found not to meet the needs of their intended target market.
- Seek to ensure that products are distributed in a manner consistent with their intended purpose and customer base.

Our goal is to ensure that customers are offered products that are appropriate for their needs and circumstances and that continue to provide value throughout their lifecycle.

8. Claims Handling

We are committed to ensuring that claims are handled fairly, promptly and in accordance with the terms and conditions of the policy. When submitting a claim, you can expect:

- Prompt acknowledgement of new claim notification, typically 1 to 2 business days.
- Clear information about the claims process and any information required in a clear and accessible language.
- Regular updates while a claim remains under active assessment, including communication of any material developments.
- Fair and timely assessment of claims.
- Clear explanations of claim decisions, typically within 5–10 business days of receipt of all required information.

Valid claims are generally settled within 5 business days of acceptance and receipt of all required documentation and, in all cases, no later than 15 business days unless prevented by legal or operational circumstances outside our reasonable control. Where a service standard cannot be met, customers will be informed of the reason for the delay and provided with an updated expected timeframe.

We recognise that some customers may require additional support. Where appropriate, we will ensure that:

- Communications are adapted to individual needs.
- Personal circumstances are taken into account.
- Additional assistance is provided throughout the claims or complaints process.
- Customers are treated fairly, sensitively and with respect.

Where a service provider's claims handling process differs from the approach contemplated above or where circumstances are likely to impact service delivery, it is the responsibility of the service provider to communicate its process, applicable timelines, and any material deviations clearly and proactively, while continuing to uphold the principles of this Customer Treatment Policy.

9. Complaints Handling

Customers may submit complaints in accordance with our Complaint Handling Policy which is available on our website and on request.

We are committed to ensuring that complaints are:

- Promptly acknowledged.
- Handled fairly and objectively.
- Investigated appropriately.
- Addressed with clear information regarding outcomes.
- Handled in accordance with applicable legal and regulatory requirements.
- Supported by information on available escalation and dispute resolution options.

Alternative or product-specific complaint handling timeframes may apply where required by the applicable legal or regulatory requirements and will be communicated where appropriate.

10. Keeping Our Standards High

CIEL regularly reviews customer feedback, complaint trends, service performance and oversight arrangements to support continuous improvement and ensure that customer service standards remain effective and appropriate. We use the insights gained from these reviews to identify opportunities to enhance customer experience, improve service delivery and support fair customer outcomes.

This Customer Treatment Policy is intended to define what level of service should be delivered rather than prescribe how the service is provided. Accordingly, we remind you that appointed third-party claims handling service providers may maintain their own procedures, workflows, systems, and operational processes, provided these are designed to achieve the standards and expectations set out in this Customer Treatment Policy.