

COPY OF VULNERABLE CUSTOMER POLICY

VULNERABLE CUSTOMER POLICY

FIRST LINE PROTECT LTD HAS A VULNERABLE CUSTOMER POLICY WHICH IS DESIGNED TO ENSURE THAT THE WAY IN WHICH WE CONDUCT OUR BUSINESS DOES NOT HAVE A DETRIMENTAL IMPACT UPON VULNERABLE CUSTOMERS. FOR THE PURPOSES OF THIS POLICY, VULNERABLE CUSTOMERS ARE CUSTOMERS AND PROSPECTIVE CUSTOMERS WHOSE ABILITY OR CIRCUMSTANCES REQUIRE US TO TAKE EXTRA PRECAUTIONS IN THE WAY THAT WE SELL AND PROVIDE OUR SERVICES TO ENSURE THAT THEY ARE NOT DISADVANTAGED IN ANY WAY.

WHAT IS A VULNERABLE CUSTOMER?

THE FINANCIAL CONDUCT AUTHORITY (FCA) DEFINES A VULNERABLE CUSTOMER AS “SOMEONE WHO, DUE TO THEIR PERSONAL CIRCUMSTANCES, IS ESPECIALLY SUSCEPTIBLE TO DETRIMENT, PARTICULARLY WHEN A FIRM IS NOT ACTING WITH APPROPRIATE LEVELS OF CARE.” THE FCA EXPECTS FIRMS LIKE OURSELVES TO TREAT ALL OUR CUSTOMERS FAIRLY AND WHEN DEALING WITH PEOPLE WITH VULNERABLE CIRCUMSTANCES TO TAKE ACCOUNT OF SUCH VULNERABILITY TO ENSURE THAT THE WAY THAT WE SELL AND PROVIDE OUR SERVICES DOES NOT CAUSE THEM DETRIMENT.

IDENTIFYING A VULNERABLE CUSTOMER

OUR STAFF ARE TRAINED TO IDENTIFY VULNERABLE CUSTOMERS AND TO PROVIDE THE ADDITIONAL LEVEL OF ASSISTANCE THEY MAY REQUIRE IN ORDER TO ACHIEVE A GOOD OUTCOME. HOWEVER, IT IS NOT ALWAYS EASY TO RECOGNISE THESE CHARACTERISTICS. THEREFORE, IF YOU BELIEVE YOU MEET THE CRITERIA FOR A VULNERABLE CUSTOMER, PLEASE READ THIS STATEMENT AND NOTIFY US AS SOON AS POSSIBLE OF YOUR PARTICULAR NEEDS. YOU ARE ENCOURAGED TO DO THIS WHEN YOU FIRST MAKE CONTACT WITH US.

VULNERABILITY GROUPS

WE RECOGNISE THAT CERTAIN GROUPS OF CUSTOMERS MAY BE VULNERABLE. WHILST NOT ALL CUSTOMERS IN THESE GROUPS MAY BE VULNERABLE, WE WILL CONSIDER A CUSTOMER'S INDIVIDUAL CIRCUMSTANCES WHERE A POTENTIAL VULNERABILITY IS IDENTIFIED. THESE GROUPS MAY INCLUDE, BUT ARE NOT RESTRICTED TO:

1. CUSTOMERS WITH COMMUNICATION DIFFICULTIES (INCLUDING LEARNING DIFFICULTIES AND ENGLISH NOT BEING THEIR FIRST LANGUAGE, DYSLEXIA)
2. A CUSTOMER WITH A REDUCTION IN PHYSICAL OR MENTAL CAPACITY
3. CUSTOMER WITH HEALTH ISSUES – ILLNESS, WHETHER PHYSICAL OR MENTAL ILLNESS, SEVERE OR LONG TERM
4. A SUDDEN DIAGNOSIS OF SERIOUS ILLNESS TO THE CUSTOMER OR CLOSE FAMILY MEMBER
5. PERSONAL CIRCUMSTANCES OF THE CUSTOMER – FACTORS SUCH AS FINANCIAL DIFFICULTIES, BEREAVEMENT, CARING RESPONSIBILITIES OR REDUNDANCY
6. THE CUSTOMERS AGE PARTICULARLY OLDER AND YOUNGER PEOPLE. FOR EXAMPLE, A YOUNGER PERSON MAY BE CONSIDERED INEXPERIENCED AND THE OLDER PERSON MAY BE LESS TECHNOLOGICALLY ABLE

OUR KEY PRINCIPLES WHEN ENGAGING WITH A VULNERABLE CUSTOMER

AS SOON WE THINK WE MAY BE ENGAGING WITH A VULNERABLE CUSTOMER, WHETHER THIS IS THROUGH OUR IDENTIFICATION OR YOU ARE APPROACHING US, WE WILL:

1. IMMEDIATELY MAKE A RECORD OF THIS AND ENSURE WE ADHERE TO THIS POLICY
2. PROVIDE ADDITIONAL OPPORTUNITIES FOR YOU TO ASK QUESTIONS ABOUT THE INFORMATION WE HAVE PROVIDED

- 3. CONTINUOUSLY SEEK CONFIRMATION THAT YOU HAVE UNDERSTOOD THE INFORMATION THAT HAS BEEN PROVIDED**
- 4. ASK IF THERE IS ANYBODY WITH YOU WHO IS ABLE TO ASSIST. IF NOT, AND WE BELIEVE THIS WILL BE BENEFICIAL, WE WILL MAKE ARRANGEMENTS TO CONTINUE WITH THE SUBJECT MATTER AT ANOTHER TIME**
- 5. OFFER YOU THE OPPORTUNITY TO COMPLETE THE TRANSACTION AFTER A PERIOD OF FURTHER CONSIDERATION**

IF WE CAN'T HELP A CUSTOMER, WE WILL TRY AND MAKE SURE THAT THEY UNDERSTAND WHAT ALTERNATIVE OPTIONS ARE AVAILABLE TO THEM.