

## **Client Treatment Policy**

### **1. Introduction**

This Client Treatment Policy ("Policy") articulates the approach taken by Octium Life DAC (referred to as "Octium" or the "Company") to deal with treating clients fairly. This policy outlines our commitment to treating clients with fairness, diligence, and transparency, ensuring that our practices align with regulatory requirements and industry best practices.

### **2. Principles**

- We treat every client fairly and with respect and courtesy.
- We provide clear, accurate, and timely information about our products and ensure that all communications are transparent.
- We safeguard client information and adhere to all relevant data protection laws and regulations.
- We provide multiple channels for communication and support.
- We respond to client inquiries and complaints promptly and efficiently and we strive to resolve issues at the first point of contact and in a timely manner.

### **3. Conflicts of Interest**

We have established policies and procedures to prevent and manage conflicts of interest. We ensure that all Company employees act in the best interests of clients at all times. If a conflict is identified, we escalate it appropriately according to our internal policies and procedures.

### **4. Personal Data**

We are dedicated to processing personal data collected from clients in strict compliance with Regulation (EU) No 2016/679 (GDPR). Our data protection policies and procedures adhere to the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality. We ensure that all personal data is processed securely, and that clients' privacy rights are upheld.

### **5. Product Suitability**

We ensure that products are marketed only to suitable clients. We regularly review our products to ensure they meet the needs and profiles of our clients. We explicitly outline the characteristics that make a product unsuitable for certain client segments.

### **6. Management of Client Processes**

We are dedicated to the prompt and efficient management of all client-related processes. This includes handling claims and complaints with the utmost efficiency and care. Our goal is to minimize delays and ensure a smooth, satisfactory resolution for our clients.

### **7. Adequate Qualification of Employees**

We invest in the continuous training and development of our employees. We ensure that our staff are knowledgeable, empathetic, and capable of addressing client needs effectively.

## **8. Mechanisms for Internal Reporting and Monitoring**

We perform regular audits and have feedback systems in place to continuously monitor and improve our client service practices. These mechanisms help us maintain high standards and promptly address any areas of concern.