Complaints Handling Policy

1. Purpose

This policy sets out how Subcontext handles complaints from customers, end users, and other stakeholders.

We aim to handle every complaint fairly, promptly and consistently, to put things right where we have got them wrong, and to use what we learn to improve. Our customers are regulated firms with their own duties to treat their clients fairly, so we also explain in this policy how complaints about a customer's own service are dealt with.

2. Definitions

Term	Meaning
Complaint	Any expression of dissatisfaction about Subcontext's service, conduct or products, whether written or spoken, and whether or not it uses the word "complaint"
Customer	A business that has an agreement with Subcontext to use the platform
End user	A person who interacts with a Subcontext customer through the platform, for example by chatting with a customer's AI agent
Complainant	The person or organisation making the complaint

3. Scope

This policy covers complaints about Subcontext itself, for example:

- The availability, performance or behaviour of the platform
- Our support, billing or account management
- How we have handled personal data for which Subcontext is the controller
- The conduct of anyone working for Subcontext

3.1 Complaints about a customer's own service

Subcontext provides technology to firms. Where an end user's complaint is about a customer's product, advice, pricing, claims decision or other service, that firm is responsible for handling it under its own complaints procedure, including any right the end user has to refer it to the Financial Ombudsman Service. If we receive such a complaint, we pass it promptly to the firm concerned and tell the complainant that we have done so and who will deal with it.

Where a complaint about a customer's service is partly caused by the platform, for example an AI agent giving a wrong answer, we work with the customer to investigate our part and fix it.

3.2 Complaints tracking on the platform

The platform includes a complaints feature that customers use for complaints from their own clients. It tracks acknowledgement within 5 business days and a final response within 8 weeks by default (both configurable by the customer), and warns the customer's team as deadlines approach. AI agents on the platform also follow a complaints handling conduct rule, and conversations can be escalated to the customer's own team. These tools support customers' own processes, and the customer remains responsible for its complaints handling.

4. How to Make a Complaint

Complaints can be submitted by email to hello@subcontext.com with the subject line "Complaint". Please include:

- Your name and organisation
- A clear description of the issue
- Any relevant supporting information (screenshots, dates, reference numbers)
- The outcome you are seeking

Customers can also raise a complaint through a support ticket from Help in the dashboard, or by email to support@subcontext.com. A complaint raised in any of these ways, or by any other means, is treated as a complaint under this policy. If you need help to make a complaint, for example because of a disability or other circumstances, tell us and we will make reasonable adjustments.

5. Response Times

Stage	Timeline
Acknowledgement	Within 2 business days
Initial investigation and response	Within 10 business days
Final resolution (if escalated)	Within 20 business days

If we require additional time to investigate, we will inform you and provide an updated timeline.

Business days are Monday to Friday, excluding public holidays in England. Timescales run from the day after we receive the complaint.

6. How We Handle a Complaint

1. **Record:** the complaint is logged with the date received, the complainant, a summary and the outcome sought.
2. **Acknowledge:** we confirm receipt, name the person handling it, and say when to expect a response.
3. **Investigate:** the complaint is investigated by someone who was not directly involved in the matter complained about, where practicable. They review the relevant records, such as support tickets, audit logs and conversation transcripts, and speak to the people involved.
4. **Respond:** we explain what we found, whether we uphold the complaint in full, in part or not at all, and why, and what we will do to put things right.

5. **Put things right:** where we got something wrong, we fix it and, where appropriate, apologise and offer a remedy, such as a correction, a service credit or a refund, in line with the customer's agreement.
6. **Close:** the complaint is closed when the response has been sent and any agreed actions are complete, and the record is updated.

Worked example

A customer complains that an outreach batch sent SMS messages later than scheduled, and some of their clients were contacted outside the times they expected. We acknowledge the complaint the next business day. The investigation finds that a background job was delayed by a fault, and we respond within 10 business days with the cause, the fix we have made, and a service credit under the customer's order form. The complaint is recorded, and the fault is added to the review of recurring issues.

7. Escalation

If you are not satisfied with the initial response, you may request escalation by replying to the response and requesting a review by a member of the founding team.

The reviewer looks at the complaint afresh, including whether the original investigation was fair and complete, and gives a final response within the timescale in section 5. Where the complaint is about a member of the founding team, a different director carries out the review.

8. Data Protection Complaints

Complaints relating to data protection or privacy should reference the Privacy Policy and may also be directed to the Information Commissioner's Office (ICO) at ico.org.uk.

Where Subcontext processes personal data on behalf of a customer, the customer is the controller. We pass data protection complaints about that processing to the customer, and help them respond, in line with the Data Processing Agreement and the Data Subject Rights Procedure.

9. Roles and Responsibilities

Role	Responsibility
Directors	Approve this policy, review complaint trends, and decide escalated complaints
Complaint handler (a member of the team not involved in the matter, where practicable)	Investigates and responds within the timescales above
Everyone at Subcontext	Recognises a complaint when they receive one, and logs it straight away

10. Recording and Learning

All complaints are recorded and reviewed periodically to identify patterns and improve our service.

Complaint records include the date received, the nature of the complaint, the outcome, the remedy given, and the dates of each response. The directors review complaints at least quarterly, looking for recurring

causes and any sign that customers or end users have been treated unfairly, and track the resulting actions to completion. Complaints are never held against the person who made them.

11. Related Documents

- Service Levels & Support Policy
- Data Subject Rights Procedure
- Whistleblowing Policy
- AI Ethics & Responsible Use Policy
- Incident Response Plan

12. Document Control

Item	Detail
Owner	A director of Subcontext Ltd
Approved by	The directors of Subcontext Ltd
Review	At least annually
Effective	October 2026

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