

CIRCLES.LIFE COMPLAINTS HANDLING POLICY

Updated on 30 January 2023

ABOUT THIS SECTION

We're all about putting power back into the hands of customers by delivering highly personalised digital services to them. With this in mind, we acknowledge that there are certain opportunities and improvements, and this can be done through constant feedback received from our customers and potential customers. This document sets out our complaints handling process.

WHAT IS A COMPLAINT?

A complaint is defined as any expression of dissatisfaction that our customers or non-customers have raised on our available contact channels where a response or resolution is expected. If you have an issue with our products or if you are dissatisfied with our services or how we handled your enquiry, and if you have reported it to us, we will treat this as a complaint and we will handle and resolve it in a timely manner. If you would like to make a complaint, it is your right to let us know in order for us to continuously improve the way that we deliver great customer service and products.

WHO CAN MAKE A COMPLAINT?

Generally, anyone can raise a complaint, regardless of whether you are a customer or not. There's no additional charge to raise a complaint to our Customer Happiness Team and it is easy to do so. If you are having difficulties for any reason, reach out to us and we will assist you the best we can.

HOW DO I RAISE A COMPLAINT?

Here are the channels that you can use to raise a complaint:

1. Live Chat through our website at <https://www.circles.life/au/help/> or on our Circles.Life app during our advertised business hours
2. Contact us forms via our website at <https://www.circles.life/au/help/> or Circles.Life app
3. Email us directly at happinessau@circles.asia
4. Our official Social Media accounts on Facebook and Instagram
5. Voicemail at 1300 863 004 (Toll-free) or +61 2905 39420
6. Post to Circles Life Australia, Circles Life % WeWork, 383 George Street, Sydney NSW 2000

The section "Response and Resolution Timeframes" below sets out when we will respond to complaints lodged through each of these channels.

If it is not clear from your communication whether or not you wish to make a complaint, our Customer Happiness Team will seek clarification from you. If required, our Customer Happiness Team will help you to formulate, make and progress a complaint.

HOW LONG WILL IT TAKE CIRCLES.LIFE TO RESOLVE MY COMPLAINT?

Our goal is to resolve complaints in a timely manner. As such, our aim is to fully resolve any issue within 72 hours for all contact channels, or 2 working days for urgent complaints. Please keep in mind that complex issues may take longer to resolve, however, we will keep you informed along the way.

We have the right to request reasonable assistance from a third party, such as our service provider or another telecommunications service provider, to resolve your complaint. This may add time to your resolution turnaround but we will notify you of this throughout the complaints process.

HOW WILL MY COMPLAINT BE PRIORITISED?

Since there are different issues involved, we will need to prioritise your complaint based on both the impact on you and our business. The matrix below shows the prioritisation that we will follow:

PRIORITY	DESCRIPTION	OWNERSHIP
Low	Affecting ability to use services billed for	Handled by Customer Happiness Experts
Medium	Dissatisfied with service received, need for escalation, etc	Handled by Customer Happiness Experts, Leaders or with assistance from other departments or Optus
Urgent	Life-threatening, multiple complaints lodged, ongoing technical or billing issues, issues related to fraud, privacy, security or financial hardship, if disconnection is imminent and due process has not been followed	Handled by Customer Happiness Experts, Leaders or with assistance from other departments, Optus or Law Enforcement Agencies

Within each priority level, complaints are generally processed in the order they are received.

RESPONSE AND RESOLUTION TIMEFRAMES

We aim to respond to and resolve your complaint on first contact, or if that is not possible, within the following time frames. However, some complaints may require us to seek reasonable assistance from third parties or may be more complex which may lead to longer resolution times. We will let you know immediately of any changes to these time frames in dealing with your complaint:

First Reply Time (Chat) - 60 seconds
First Reply Time (Email) - 3 hours
First Reply Time (Voicemail) - 24 hours
First Reply Time (Social Media) - 3 hours
First Reply Time (Letter) - 24 hours upon receipt of letter
Resolution Time (Medium) - 72 hours
Resolution Time (Urgent) - 2 business days
Complex Issues: 5 business days

Please note all times listed are for during business hours as shown on our website.

HOW CAN I KEEP TRACK OF MY COMPLAINT?

- You will receive an email with a ticket number once you have submitted your complaint.
- You can reply to this email, especially if you need to provide additional information or require additional updates.
- If Circles.Life requires any additional information regarding your complaint, we will do so by sending a request to the same email address to which we sent your ticket number.
- Once the complaint has been resolved, you will be notified through the same email address. If you agree that the matter has been resolved, we will close the complaint ticket and a system-generated Customer Satisfaction Survey will be sent afterwards. This survey will help us identify any areas of improvements in assisting you as a customer or another potential customer.

WHAT IF I AM UNABLE TO SPEAK WITH OR RESPOND TO CIRCLES.LIFE MYSELF?

If you would like to nominate another person to speak to us on your behalf, we may contact them and ask for their permission either via phone or in writing first to ensure privacy and security. We may require appropriate evidence of authority from you such as a letter of authorisation or a power of attorney. If you have a disability and require assistance to lodge a complaint, our experts will be more than happy to assist you.

Circles Australia Pty Ltd ABN 25 630 647 264 V1.1 - Updated on 24 September 2020 If you would like to contact us to make a complaint but require assistance to do so (for example, if English is not your first language), you can contact us through the Translating and Interpreting Service (TIS National) through their contact number 131 450. For more information visit <https://www.tisnational.gov.au/en/About-TIS-National>.

If you have hearing difficulties, are deaf or have a speech impairment and have difficulties in communicating, you can contact us using the National Relay Service via their website at <https://internet-relay.nrscall.gov.au/>.

Should you have more specific needs requiring assistance in making a complaint (e.g. financial hardship situations or disability), please let us know so that we can determine the best way to assist you properly.

WHAT IF I NEED TO ESCALATE THE COMPLAINT FURTHER?

A complaint can be escalated at any time by contacting us through one of our contact channels. If our experts were not able to resolve a complaint, or if there is any special approval or investigation needed, we will escalate the ticket created to our Level 2 Experts, to a Team Leader, or to a Customer Happiness Manager. They will then reach out to you directly through email or may call you for faster resolution.

WHAT IF MY COMPLAINT IS URGENT?

We deal with the majority of complaints in the order they are received. However, there are certain types of complaints which are always considered urgent; on-going technical or billing issues, issues related to fraud, privacy, security or financial hardship, you are receiving priority assistance due to a life threatening medical condition or if disconnection is imminent and due process has not been followed. These types of complaints are urgent in nature and we aim to resolve these within 2 working days.

WHAT DOES CIRCLES.LIFE EXPECT FROM ME?

If you have an outstanding balance while your complaint is being investigated, we ask that any outstanding amount on your bills that is not being disputed be paid by you. We will not take credit management action on amounts that are the subject of the complaint, nor will we cancel a service just because there was a complaint made by you.

HOW WILL CIRCLES.LIFE HANDLE MY COMPLAINT?

If a complaint is complex or requires extra time to resolve, we will discuss this with you and provide reasons and updated timelines. We will keep you up to date along the way with the progress of your complaint.

Once we receive your complaint, we will attempt to resolve it at our first contact. If we are not able to immediately resolve it, we will process and review all the information and make any investigations required and come back to you with a proposed resolution. We will then ask if you agree with the resolution and implement the proposed resolution if you do so. We will not sign off or mark the complaint as resolved until you have indicated that you agree that the complaint can be closed.

We may also close the complaint if we are unable to contact you to discuss the complaint or advise you of a proposed resolution or if you are dissatisfied with the progress or resolution of the complaint, we reasonably conclude that we can do nothing more to resolve the complaint and we have advised you of the internal escalation options and external dispute resolutions options, including the TIO.

To ensure that complaints are resolved effectively, we will be sending a system-generated Customer Satisfaction Survey once your complaint is resolved. This is where customers and non-customers can provide overall feedback regarding the service and the resolution that was provided.

At any point during the complaint, you have the right to consult with an external third party or the Telecommunications Industry Ombudsman (TIO) to assist you.

WHAT IF I AM STILL DISSATISFIED WITH THE RESOLUTION GIVEN?

If you are not satisfied with our review and resolution of your complaint or with the way in which we have handled your complaint, you have the right to consult with an external third party or the Telecommunications Industry Ombudsman (TIO) to assist you.

To lodge a complaint with the TIO, you can call 1800 062 058 or contact them via their website www.tio.com.au. Please note that they will need you to provide a ticket number issued by Circles.Life. The TIO will expect you to have attempted to resolve the complaint with us before lodging a TIO complaint. Please note that your service will not be cancelled if you are unable to resolve the complaint directly with Circles.Life and are pursuing an external dispute resolution.

WHAT HAPPENS WHEN MY COMPLAINT IS RESOLVED?

Once you have agreed to the terms of our proposed complaint resolution and we have implemented the resolution, we will send you correspondence outlining the complaint and the resolution agreed upon. We will then mark the complaint as being resolved for our internal records and close the enquiry. We will not delete the complaint from our records at any stage, even after resolution.

We may also close the enquiry if we reasonably conclude that we can do nothing more to resolve the complaint. In that case, we will notify you of the reasons why we closed the enquiry. We will advise you of your options to escalate the complaint internally or externally (for example with the TIO).

FOLLOWING UP ON A RESOLUTION DECISION

If we do not hear from you regarding our proposed resolution, we will contact you again in 10 days to follow up. If we still do not hear back from you following a further 5 days, we will send you a summary of the complaint and our proposed outcome again and mark the complaint as closed. If you wish to contact us again after this, we may choose to open a new complaint or reopen the previous complaint.