

Confidential
Public Version

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Our reference JnBn-24112907
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Subject Preliminary announcement of 2025
complaints survey concerning 2024

Dear Management Board,

This letter contains the preliminary announcement of the complaints survey which the Dutch Authority for the Financial Markets (**AFM**) conducts each year among insurance providers. The AFM asks you to report on complaints which your company receives from Dutch clients and third parties. You will receive the request for information for the complaints survey in February 2025. The survey will concern received, closed and pending complaints made by your company's Dutch clients and third parties in 2024.

In section 1 of this letter, the AFM explains the background to this complaints survey. Section 2 provides information on the AFM's data quality control and the set-up of the complaints survey. Section 3 describes how you can compile the complaints report. Section 4 explains the timetable for issuing the complaints survey and the method of submitting your response. Finally, section 5 explains the adjustments made to the product categories to be used in the complaints survey.

1. Background to the complaints survey

Insurers in Europe are required to ensure the proper handling of complaints they receive from clients. This means, among other things, that you must keep records of complaints. Complaints can serve as a key indicator of the quality and diligence of your service provision. A good understanding of insurers' complaints procedures and their implementation is therefore important for the AFM's supervision aimed at protecting consumers.¹

This is why the AFM has set up an annual complaints survey for insurers. It is set up in a way that contributes substantively to our objectives. The annual survey provides the AFM with a market-wide understanding of trends and developments in relation to complaints that insurers receive from Dutch clients.²

¹ See the "Guidelines of complaints handling by insurance undertakings (EIOPA-BoS-12/069)" and Sections 4:17, 4:19, 4:20 and 4:23 of the Financial Supervision Act (Wft).

² See Guideline 4 of "Guidelines of complaints handling by insurance undertakings (EIOPA-BoS-12/069)"

2. Data quality and set-up of the complaints survey

The AFM will pay attention to data quality. The quality control will ensure, for example, that outstanding complaints from the previous year are handled under the same complaint number. If your previous reporting (on the 2023 period) included any complaints that were still pending at the end of 2023, you must use the *same* complaint numbers in the next survey. Additionally, the AFM pays particular attention to ensuring that complaint numbers are unique (including year-on-year) and that numbers allocated to complaints that have already been closed, for example, are not reused.

3. How to compile your complaints report

You can compile the requested report in two ways at the beginning of 2025:

1. You can use the data entry form provided by the AFM. This form is available as an Excel file on the AFM website; or
2. You can compile the required file from your in-house complaints administration, based on the technical specification provided by the AFM for this purpose. This specification is also available on the AFM website.

You can find the above documents, as well as further information on the set-up of the complaints survey, at <https://www.afm.nl/complaintssurvey>. This website includes the following documents:

ID#	Name	Explanation	Relevance to the file creation method	
			Excel	Conversion
KUV1	Complaints survey specification	Describes the design of the survey, the definition of datapoints, the reporting process to be followed and submission requirements.	X	X
KUV2	Frequently Asked Questions (FAQ)	List of frequently asked questions relating to the complaints survey.	X	X
KUV3	Definitions and range of values	Definitions of fields for which a value range applies, permitted values and their individual meaning.	X	X
KUV4	Excel data entry form	The Excel sheet that can be used to record complaint entries.	X	
KUV5	Taxonomy (XSD)	XML schema of the XML database to be submitted.		X
KUV6	Range of values of reference files	ZIP file with ranges of values for datapoints (where applicable).		X

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4. Planning for the complaints survey

The AFM believes it is important that you have sufficient opportunity to fulfil the reporting obligation. The above documents and information are therefore available on the AFM website from today.

You will receive the request for information in **March 2025**. You will then have five weeks to complete the survey and upload the required file.

It can only be uploaded via the AFM Portal. The AFM Portal is the AFM's central resource area for its services and forms, where files can be sent in a secure environment. You can find the AFM Portal [here](#). You need an account to log in to the AFM Portal. If you do not have an account yet, you must first create one linked to your company (see the appendix for more information). In February 2025, the complaints survey will be available in the *Reporting Obligations* section of the AFM Portal.

The AFM will maintain confidentiality in respect of the data you provide. This means, among other things, that when the AFM shares data from the complaint records with third parties (e.g. in the form of publications of market analyses or in the newsletter), this will be at market level and in such a way that the data cannot be used to identify your company.

5. Adjustment to product categories in the complaints survey

The annual complaints survey must indicate, among other things, which product category a complaint refers to. A list is available for this datapoint comprising different product categories (see the '*Product*' tab in the '*KUV3 Definitions and range of values*' document on the AFM website).

The list of product categories will be adjusted following an analysis by the AFM of previously reported complaints. The adjustments are more in keeping with the product categories currently used in the market.

In short, the adjustments to the product categories involve:

- 1) the addition of product categories;
- 2) adjustments to the names of several product categories. In two cases, two 'old' product categories will also be merged into one new product category;
- 3) discontinuation of the use of product codes for the product categories.

The appendix to this letter provides a full overview of the adjustments to be made to the list of product categories.

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Further information

You can find the most frequently asked questions about the complaints survey on this [website](#). If your question is not included, you can contact us at klachtenuitvraagverzekeraars@afm.nl.

Sincerely,
The Dutch Authority for the Financial Markets

Appendices:

- **AFM Portal account**
- **Adjustments to prescribed range of values for product categories**

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Appendix: AFM Portal account

The complaints report can only be submitted via the AFM Portal. If your company does not yet have an AFM Portal account, please create one as soon as possible. The AFM Portal's login page has a manual explaining the registration procedure for the AFM Portal and how to authorise staff to submit a report. If you have any questions about creating an account or authorising staff, please contact the Business Desk: ondernemersloket@afm.nl.

Appendix: adjustments to prescribed range of values in relation to product categories

The table below is an overview of the additions to the list of product categories in the complaints survey. The table also provides an overview of the 'old' product names of which the names will be changed. For its own internal use, the AFM has divided the product categories into main categories, as shown below.

New list of product categories	Current list of product categories	Explanation
Non-life insurance private individuals:		
<i>Liability insurance</i>	<i>A001 Liability insurance - private individual</i>	Adjustment of name
<i>Bicycle / moped and scooter insurance</i>		New category
<i>Pet insurance</i>		New category
<i>Household contents insurance</i>	<i>P003 Fire - household contents insurance for private individuals</i>	Adjustment of name
<i>Motorhome insurance</i>		New category
<i>Motorcycle insurance</i>		New category
<i>Accident insurance</i>	<i>I012 Income protection insurance - Accident insurance</i>	Adjustment of name
<i>Homeowners insurance</i>	<i>P004 Fire - homeowners insurance for private individuals</i>	Adjustment of name
<i>Breakdown cover</i>		New category
<i>Private car insurance insurance</i>	<i>M014 Car insurance for private individuals</i>	Adjustment of name
<i>Leisure Craft & Pleasure Boat Insurance</i>		New category
<i>Legal expenses insurance</i>	<i>V020 Legal expenses insurance</i>	Adjustment of name
<i>Travel and/or cancellation insurance - continuous</i>	<i>R021 Travel insurance - continuous</i>	Adjustment of name
<i>Travel and/or cancellation insurance - single trip</i>	<i>R022 Travel insurance - single trip</i>	Adjustment of name
	<i>R023 Travel insurance - other</i>	Category will be deleted
<i>Mobile phone insurance</i>		New category
<i>Other</i>	<i>B007 Fire - private individuals other</i>	Adjustment of name
	<i>P027 Non-life insurance other private individuals</i>	Category will be deleted

Non-life insurance business:		
<i>Liability insurance</i>	<i>A002 Liability insurance - business</i>	Adjustment of name
<i>Commercial vehicle insurance</i>	<i>M015 Car insurance - business</i>	Adjustment of name
<i>Cyber insurance</i>		New category
<i>Trade credit insurance</i>		New category
<i>Business stock and contents insurance</i>		New category
<i>Commercial property insurance</i>	<i>B005 Fire - businesses</i>	Adjustment of name
<i>Legal expenses insurance</i>		New category
<i>Technology insurance</i>	<i>B008 Technical</i>	Adjustment of name
<i>Transport insurance</i>	<i>T024 Transport insurance</i>	Adjustment of name
<i>Agricultural insurance</i>	<i>B006 Fire - agricultural risks</i>	Adjustment of name
<i>Other</i>	<i>B028 Non-life insurance other business, Credit and bail and Miscellaneous monetary losses</i>	Adjustment of name

Income protection insurance:		
<i>Occupational disability insurance cover - individual</i>	<i>I009 Occupational disability insurance cover</i>	Adjustment of name
<i>Other payment protection insurances - individual</i>	<i>I011 Payment protection other</i>	Adjustment of name
<i>Absenteeism insurance - employer</i>	<i>I010 Income protection insurance - employer's liability insurance</i>	Adjustment of name

Health insurance policies		
<i>Healthcare insurance - supplementary</i>	<i>Z026 Healthcare insurance - supplementary</i>	Adjustment of name
<i>Healthcare insurance - basic</i>	<i>Z025 Healthcare insurance - basic</i>	Adjustment of name

Life insurance:		
<i>Unit-linked insurance</i>	<i>L029 Unit-linked insurance mortgage-related L030 Unit-linked insurance third-pillar pension L032 Unit-linked insurance other</i>	Adjustment of name
<i>Unit-linked insurance second-pillar pension</i>	<i>L031 Unit-linked insurance second-pillar pension</i>	Adjustment of name
<i>Non-participating savings-based insurance</i>	<i>L035 Savings-based insurance mortgage-related L036 Savings-based insurance third-pillar pension L038 Savings-based insurance other</i>	New category
<i>Participating savings-based insurance</i>	<i>L035 Savings-based insurance mortgage-related L036 Savings-based insurance third-pillar pension L038 Savings-based insurance other</i>	New category
<i>Savings-based insurance second-pillar pension</i>	<i>L037 Savings-based insurance second-pillar pension</i>	Adjustment of name
<i>Immediate annuity insurance paid</i>	<i>L034 Immediate annuity insurance</i>	Adjustment of name
<i>Benefit in payment – second-pillar pension insurance</i>	<i>L033 Immediate pension (including defined benefit schemes)</i>	Adjustment of name
<i>Term life insurance policy</i>	<i>L039 Term life insurance policy</i>	Adjustment of name
<i>Funeral Insurance - in kind</i>	<i>L040 Funeral Insurance - in kind</i>	Adjustment of name
<i>Funeral Insurance - cash plan</i>	<i>L041 Funeral Insurance - capital</i>	Adjustment of name
<i>Life insurance other</i>	<i>L042 Life insurance other</i>	Adjustment of name