

SMARTY Policy Document: Vulnerable Situations Policy.

SMARTY's Vulnerable Situations Policy:

At SMARTY we are committed to providing an excellent quality of service and making sure that our products and services meet the needs of all our customers.

Our regulator defines vulnerability as follows;

Some people's ability to participate in communications, markets and society is affected by factors such as their age, disability, income or geographical location. Life events such as bereavement or illness can temporarily reduce people's ability to participate in society and/or increase their dependence on certain communications services.

Vulnerability is about people's circumstances, which can change over time. In relation to communications, it can have a range of negative consequences;

- People may suffer financial detriment, for example if they are a victim of mis-selling or if they are unable to access the best deals
- They may become isolated if they are unable to keep in touch with family and friends
- They may not be able to participate as fully in society as they would wish.

Vulnerability is far-reaching and has many forms, can be permanent or temporary and, it is therefore, not easy to state an all-encompassing definition. Vulnerability includes, but is not limited to, living with physical health issues or a mental illness, suffering from a mental impairment, having a learning disability, literacy or numeracy difficulties, having a speech impairment, life changes, or not speaking English as a first language. We look to support every situation individually and with sensitivity. You can update us of your specific needs at any time through any channel.

N.B. This policy does not limit your rights under the "Consumer Contracts Regulations", the "Sale of Goods Act" or any other statutory rights that you may have.

Specific Services-

SMARTY already has services in place to support you if you find yourself in a vulnerable situation. However, if you need us to consider something else that we might not have, contact us directly to allow us to assist or direct you appropriately.

- Debt management/financial hardship/Unemployment.
 - Because SMARTY's plans roll from month to month and have the facility to pause at the end of each period, should you experience any financial issues you can simply disable auto renew through your dashboard.
 - If required, please contact us to discuss. Or if you'd prefer, you can gain advice externally through organisations, such as, Step Change - <https://www.stepchange.org>, the Money Advice Services - <https://www.moneyadviceservice.org.uk/en> and National DebtLine - <https://www.nationaldebtline.org>
- Bereavement
 - SMARTY will make the process for account closure for a deceased customer as seamless and stress free as possible. All our channels are aware of the process for handling and supporting this situation. If required, please contact us to discuss. Or if you'd prefer, external support is also available through support agencies, such as, Samaritans - <https://www.samaritans.org> , McMillan Cancer - <https://www.macmillan.org.uk>, etc.
- Power of attorney
 - On receipt of proofs, SMARTY will register the authorised contact noted on the proofs on a customer account. SMARTY will allow the authorised contact full access to perform any action on the account. If required, please contact us to discuss or for more general information visit Gov.uk - <https://www.gov.uk/power-of-attorney>
- Authorised Contact
 - SMARTY allows a customer to nominate a friend or relative to help manage their account. You can choose the level of access you want to give to an authorised contact. They could have full access to your account, which would give them permission to do everything as if they were the main account holder. Or if you want to restrict what they can do, please

just let us know when you contact us, and we can set up the correct access level.

- Imprisonment
 - SMARTY offers support and guidance when a customer is facing imprisonment. If required, please contact us to discuss.
- Armed forces
 - SMARTY offers support and guidance when a customer is in the Armed Forces. If required, please contact us to discuss.
- Serious health issues, mental health issues, terminal illness or long-term illness.
 - Following the provision of the required documentation, the account will be supported as appropriate. Or if you'd prefer, you can gain advice externally through organisations such as, Mind - <https://www.mind.org.uk>, Time To Change - <https://www.time-to-change.org.uk> or Heads Together - <https://www.headstogether.org.uk>. If required, please contact us to discuss.
- Victim of fraud
 - There are many types of fraud and ways fraudsters will try to gain access to an account or private information. SMARTY is committed to supporting victims of fraud in the following ways;
 - Articles detailing different types of fraud, guidance on how customers can best protect themselves and how to report fraud re available on our website.
 - Access to a fraud team to manage customer concerns.
 - Or if you'd prefer, you can gain advice externally through organisations such as ActionFraud - <https://www.actionfraud.police.uk>. or Victim Support - <http://www.victimsupport.org.uk/>. If required, please contact us to discuss.
- Age
 - Although age is not always a vulnerability, the 85+ age group is a fast-growing segment in the UK. This means the proportion of the population with hearing, sight or other age-related difficulties is set to increase. Older consumers can be vulnerable not because of their age but due to a range of linked factors or situations they may be in. We promote customers to appoint an authorised contact to help manage

affairs. If required, please contact us to discuss. Or, if you'd prefer you can gain advice externally through organisations, such as, Age UK - <https://www.ageuk.org.uk> or Independent Age - <https://www.independentage.org>.

Complaints and Feedback:

Raise a complaint online via the following -

<https://smarty.co.uk/complaints>

*please feel free to provide feedback on your experience by sending us a comment using our website contact submission form -

<https://smarty.co.uk/contact-us>