

## 3.7 Customer Management – Surveys and Reviews

Coverage: Central Loans Limited

Date Issued: June 2025

Owner: Marketing Director

Review Date: June 2026



**DOCUMENT TITLE:** Surveys and Reviews

### Introduction

Central Loans Limited (CLL) is committed to providing excellent customer experiences and continuously seeks to improve its services, whilst remaining compliant with regulatory requirements.

In order to maintain, and further improve on high standards, it is essential to obtain feedback from customers regarding the service they have received.

CLL also recognises that customer feedback is a useful tool to help assess its compliance with its obligations under the Financial Conduct Authority (FCA) Rules and Principles for Business, to ensure the firm is acting to deliver good outcomes for customers (Principle 12 and PRIN 2A) and treats customers fairly (Principle 6).

CLL is also required to comply with legislation regarding the use of customer reviews and surveys, including:

- The Digital Markets, Competition and Consumers Act 2024 (“DMCCA”); and
- The FCA financial promotions (MCOB 3) and Consumer Duty Rules (PRIN 2A)

The DMCCA introduces strict legal requirements regarding the collection, publication, and use of consumer reviews to prevent misleading practices. Complementing these requirements, the Consumer Duty rules require firms to:

- act in good faith - by ensuring customer reviews are accurate, representative, and fairly presented;
- enable informed decision-making - by providing unbiased access to customer feedback; and
- avoid foreseeable harm - by preventing misleading, fake, or manipulated reviews that could distort consumer choices.

### Purpose and Scope

This Policy outlines CLL’s approach to the use of customer surveys and reviews and how it complies with the DMCCA and Consumer Duty. In so doing, ensuring transparency and fairness in how reviews are solicited, verified and used in marketing, and activity. CLL’s commitment to compliance includes:

- fair and neutral solicitation of customer reviews;
- accurate representation of customer feedback in marketing materials;
- proactive detection and mitigation of fraudulent or misleading reviews; and
- clear responsibilities for ensuring compliance across business functions.

Details of how the firm meets its regulatory requirements with regard to customer communications and financial promotions, including the use of customer surveys and reviews for marketing purposes, can be found in 3.1 Financial Promotions and 3.2 Written communications. and include

This Policy (“Policy”) applies to all CLL employees, introducers, and affiliates who engage in review-related activities.

### Definitions

- **Fake review:** A review that is fabricated, not based on a genuine customer experience, or influenced by improper incentives.
- **Cherry-picking:** The practice of selectively requesting or displaying only positive reviews.
- **Selective solicitation:** Requesting feedback only from customers with known or assumed positive experiences.
- **Introducers/affiliates:** Any third parties who refer customers to CLL and may be involved in customer communications.

### Feedback Channels

CLL collects feedback through several channels:

- **Paid Out Surveys:** Customers whose applications are funded receive a Feefo invitation to rate their experience (1–5 stars) and leave comments.

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- **Intermediary Surveys:** Brokers/introducers are invited to provide feedback on the service received.
- **Consumer Outcome Surveys:** Monthly surveys sent to customers (paid out or TUD) assessing satisfaction with fairness, fee transparency, and overall outcome. Monthly data is analysed and presented to the board and SMT in our consumer duty MI report. All the surveys are anonymous, so we cannot identify specific complaints. To encourage participation, we offer a £100 prize, to be randomly drawn at year-end, for clients who engaged with the email.
- **Other Surveys:** Ad hoc surveys may be issued to support business insights or meet regulatory demands.

Customers are also able to leave feedback and reviews via other publically accessible review platforms such as Trust Pilot or Google. Although CLL does not solicit or encourage customers to do so, CLL still monitors these platforms for signs of customer dissatisfaction or indications that reviews may be fake or misleading.

#### Soliciting Reviews – Fair and Unbiased Approach

Under Section 219B(2) of the DMCCA, businesses must not solicit, commission, or encourage fake reviews or mislead consumers about their authenticity.

CLL applies a consistent, non-selective approach to soliciting feedback and reviews, with all customers given equal opportunity to provide feedback.

In practice:

- All customers are invited to leave feedback regardless of outcome
- Reviews are collected via an independent review platforms (e.g., Feefo)
- No incentives are provided for leaving Feefo reviews

#### Preventing Fraudulent or Misleading Reviews

Under Section 219C of the DMCCA, CLL must take reasonable steps to prevent fake or manipulated reviews.

In Practice

- Review: Reviews are tracked for unusual trends (e.g., sudden spikes).
- Report: Suspected fake reviews are reported to the relevant review platform.
- Respond: Misinformation is addressed publicly on the review platform.

#### Negative Survey Feedback

Negative feedback is taken seriously and managed accordingly:

- Reviews rated 3 stars or below are escalated to an operational team leader.
- Customers may be contacted to resolve concerns or take corrective action.
- Feedback considered a complaint will be handled under CLL's complaints policy.

Following notification by the Marketing Manager, the Team Leader assesses whether this feedback requires further action, which could include any of the following as appropriate:

- the customer / intermediary will be contacted by email / telephone to discuss their feedback;
- staff singled out for particular criticism may be provided with direct, individual feedback;
- the customer comments may be referred to lender / other third party where it is clear that the customer is dissatisfied with their service; and/or
- further analysis may be required by the SMT, for example trends may indicate a requirement to update a process/ procedure.

#### Handling Positive Feedback

Positive reviews are shared and may be used in marketing:

- Testimonials may be used (anonymised) in promotional materials.
- Staff praised in reviews are acknowledged by team leaders and recognised where appropriate.

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### Use of Reviews in Marketing

Under Section 219B(1) of the DMCCA, businesses must not misrepresent customer feedback by selectively publishing positive reviews or displaying misleading star ratings.

CLL ensures transparency in how customer reviews are used in marketing materials:

- CLL will integrate a review widget (where feasible) on its website and digital channels to ensure customers can always see the full, unfiltered review history. This ensures that potential customers see a balanced and real-time reflection of customer feedback.
- All marketing materials featuring customer reviews will include CLL's current overall average rating (e.g., "Rated 4.8/5 on Feefo").
- If a customer quote is used in advertising, it must be accompanied by CLL's most recent star rating to prevent cherry-picking.
- Marketing content is reviewed quarterly for compliance with advertising standards (CAP Code).

### Enforcement and Compliance

In the event that fraudulent or unethical review practices are discovered, such as selective solicitation or fake reviews, CLL reserves the right to take appropriate corrective action. This may include; instigating disciplinary action against CLL staff or terminating relationships with introducers, brokers, or other third parties found to be in violation of this policy.

### Roles and Responsibilities

The following teams and roles are responsible for implementing this policy:

- **Chief Executive:** Has overall responsibility for ensuring compliant customer survey procedures
- **Compliance team:** Ensures compliance with regulatory requirements, including the review and monitoring of survey results, reporting on trends, handling of complaints and addressing any legal concerns.
- **Marketing Team:** Responsible for:
  - Managing the relationships with the review platform provider;
  - overseeing the collection and use of reviews and survey data;
  - ensuring all customer feedback used in marketing is accurate, representative, and compliant with this policy;
  - responding to online reviews including negative reviews;
  - monitoring for and escalating negative reviews or survey responses to operations teams; and
  - monitoring and reporting fake and or misleading reviews.
- **Team Leaders:** investigate and respond to signs of customer dissatisfaction in line with the complaint handling policy

All staff involved in review-related activities must complete an annual attestation that they have read and understood this Policy.

### Rewards and Recognition

No employee or third party may be rewarded for securing a positive review. Recognition is based on overall customer service performance and compliance with this Policy.

### Confidentiality and Data Protection

All information gathered from customer surveys, including feedback and responses, will be handled in accordance with CLL's Data Protection Policy. The confidentiality of customer feedback is paramount, and any personally identifiable information will be kept secure.

### Continuous Improvement

Feedback gathered from surveys and reviews is used to continuously improve CLL's services. We will:

- Regularly analyse feedback to identify trends, training needs, customer pain points, and areas for improvement.
- Review this policy annually, or more frequently if required by business activities or regulatory changes, to ensure it remains up-to-date and compliant with the latest industry practices.

### Conflict Resolution

Any disputes or concerns regarding review-related practices should be escalated to the Compliance Manager.

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Internal whistleblowing procedures are available for reporting unethical conduct.

**Recordkeeping**

All review solicitation communications, monitoring logs, customer responses, and quality assurance activities must be retained for a minimum of 6 years and made available to regulators upon request.