

Insurers

# Complaints survey specification

For the 2023 survey to be completed in 2024

October 2023

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# 1 Introduction

At the beginning of 2024, insurers are required to provide the AFM with information about any complaints received and handled by them.<sup>1</sup> This instruction provides a step-by-step plan on how to best complete the Excel data entry form, how to validate it and convert it to XML. This document also specifies as a reference work for all content-related technical requirements to be met by this submission. For more information, please go to <https://www.afm.nl/complaintssurvey>

The Complaints Survey for Insurers, hereinafter to be referred to as complaints survey or survey, is set up as a granular dataset. This means that the value of a set number of characteristics is requested for each individual complaint. This produces a dataset with an entry per complaint (complaint entry) which can be presented as a table:

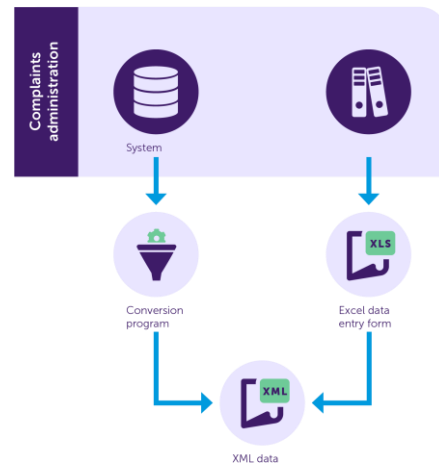
Complaint	Reference 1	Reference 2	Etc.
1	Value	Value	Value
2	Value	Value	Value
3	Etc.		

Institutions have to compile the requested dataset according to the specifications set out in this document and submit it as an XML database.

## 1.1 Method of file creation

It is up to the institutions to decide on how they want to create the required XML database, as long as this database meets the specifications set out in this document. Paragraph 6.1.1 details these specifications. In practical terms, there are basically two ways to go about this. The first variant ('conversion') proceeds from a situation in which the insurer has an automated complaints administration in place in a system designated for that purpose. The necessary data is accessed from this system and converted to the required file. The converter software required for this has to be developed by the institution itself.

The second variant ('Excel') offers the use of an [Excel data entry form](#), which is an Excel form. This data entry form is made available as part of these specifications. Also see § 3.1. The Excel data entry form lists the required datapoints and quality regulations which the submission needs to meet. You can manually enter the required data in this. Saving the form as an XML database creates the required file. Both ways are shown in the figure to the right.



The AFM stresses that the description of these methods of file creation is included as a guideline. It is not a mandatory requirement. Alternative methods of file creation are allowed, provided the resulting XML file meets all requirements. Chapter 6 sets out the requirements for each datapoint. Datapoints must be

<sup>1</sup> Where this document references 'Insurers', we mean insurance providers.

submitted in Dutch. The [KUV3 Definitions and range of values](#) item lists the translations and definitions to enable you to compile the reporting in Dutch.

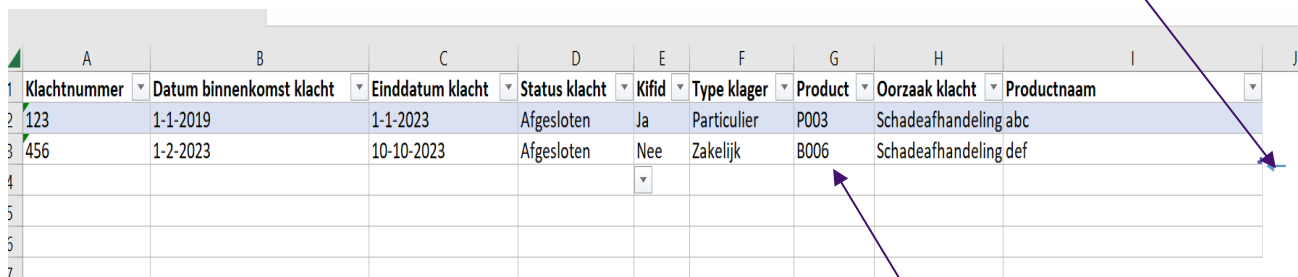
## 2 Quick start

You can start straight away with the instruction provided in this Chapter.

### 2.1 Filling in entries in Excel and saving it in a local file

You make use of the Excel data entry form. In the second tab, you can enter all complaints which you received, which ones are still pending and which ones were closed during the reporting period. The language in the [Excel data entry form](#) is Dutch. The meaning of the column headings and the selection of the cell content is available in the [KUV3 Definitions and range of values](#) item and in Chapter 6. The Excel data entry form has a drop-down list for each field with fixed values in Dutch for you to use. The reporting period runs from 1 January to 31 December of the previous year. So when the AFM sends you a request for information to report all your complaints in February, this always relates to the year before. Please see the technical specifications in Chapter 6 for further information on this topic. You can temporarily save the Excel data entry form in a local file under your own name.

Please note: there may not be any empty complaint entries in the Excel data entry form. The blue arrow is therefore directly below the last fully filled-in complaint entry. If you need more space, pull down the blue arrow.



	A	B	C	D	E	F	G	H	I	J
1	Klachtnummer	Datum binnenkomst klacht	Einddatum klacht	Status klacht	Kifid	Type klager	Product	Oorzaak klacht	Productnaam	
2	123	1-1-2019	1-1-2023	Afgesloten	Ja	Particulier	P003	Schadeafhandeling abc		
3	456	1-2-2023	10-10-2023	Afgesloten	Nee	Zakelijk	B006	Schadeafhandeling def		
4										
5										
5										
7										

Please note that the complaint numbers need to be anonymised so that they cannot be traced back to one particular consumer. Complaints may run for several years, so you may need to use the same anonymised complaint number next year as well. Please make sure that you use the correct product codes. The product codes and their meaning are listed under the 'product' tab in Appendix [KUV3 Definitions and range of values](#) on <https://www.afm.nl/complaintssurvey>.

### 2.2 Filling in the licence number you received

You enter your licence number on the initial tab of the [Excel data entry form](#). "Vergunningnummer" means licence number.

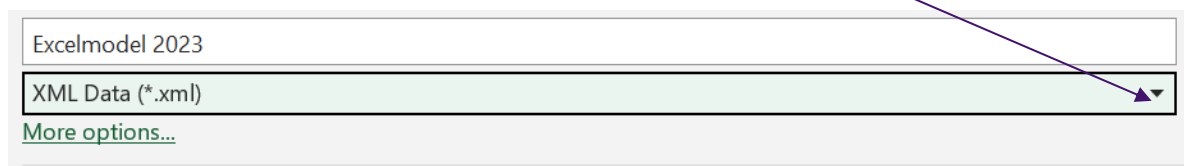
In February, you received a demand for information from the AFM which includes your licence number. This licence number is a unique number. It consists of eight figures and starts with 17 or 12. You need to fill in this number on the initial tab of the Excel data entry form.

Enter your licence number in this cell. For example, if your licence number is 17000001, this is where you enter that number. If you fail to do so, you will get an error message when converting to XML. Each year, the AFM publishes an up-to-date Excel data entry form on the website specifying the correct reporting period.

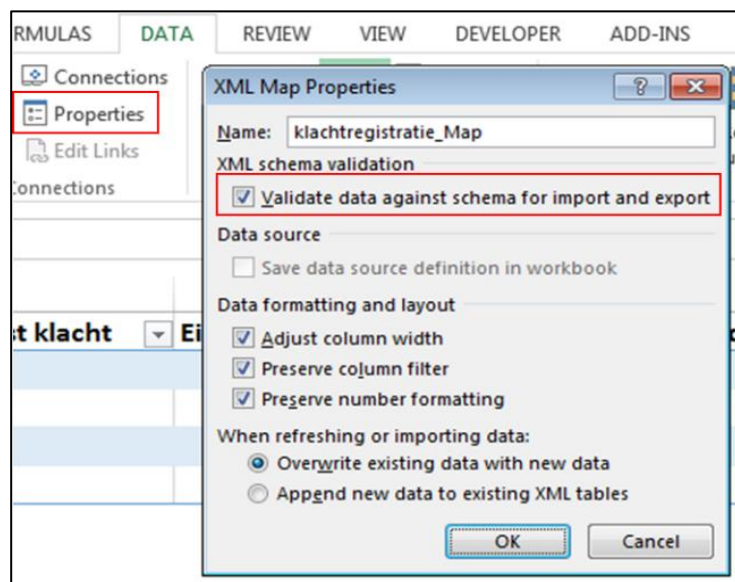
<b>Rapportage template</b>	AFM klachtenuitvraag verzekeraars
<a href="https://www.afm.nl/klachtenuitvraag">https://www.afm.nl/klachtenuitvraag</a>	Kies: "Bestand" - "Opslaan als" - "XML data" - naam eigen rapport.xml
<b>Vergunninghouder</b>	
Vergunningnummer	17000001
<b>Rapportageperiode</b>	
	2023

## 2.3 Saving the reporting as XML data for validation purposes

To validate the data, you first save the [Excel data entry form](#). You may decide on the name. To turn this into a validated XML file, choose 'Save As / Opslaan Als' and select the 'XML Data' type. XML Data is in the list below this arrow. Please note that the enumeration also includes the 'XML Spreadsheet' type. Do not select this option as the file will not validate properly.



Saving as XML will automatically validate the data as the AFM has already ticked the option 'Validate data against schema for import and export'. Should you wish to, you can check this by clicking on Properties at the top of Excel's menu under Data: See the illustration below.

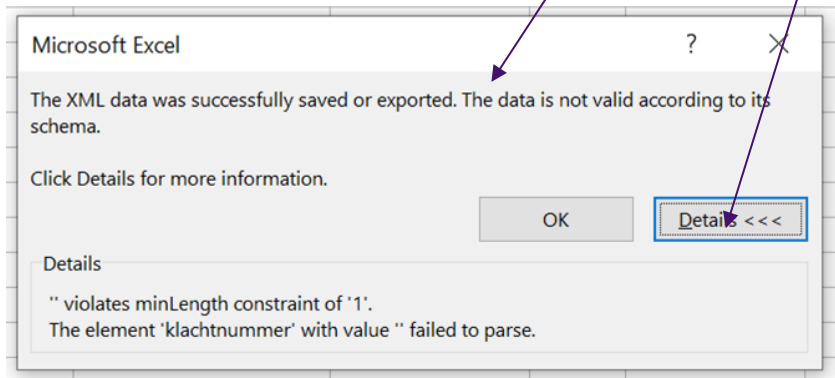


This validation checks to see whether:

- All compulsory fields have been completed.
- Entered values meet specified value ranges. See [KUV3 Definitions and range of values](#) (case-sensitive).

- Values meet other technical requirements.
- There are no empty records.

If the data fails to meet these requirements, the following notification will pop up on the screen 'The XML data was successfully saved or exported. The data is not valid according to its schema'. Under 'details' you will instantly see where the error lies. Also see 'common errors'. This file will still be saved, however. You should then ensure that the deficiencies identified are resolved in the Excel data entry form. You can do so by making the appropriate corrections in the Excel data entry form and resaving the data, and thus revalidating it. There will be no pop-up notification if the data meets the requirements.



## 2.4 Submitting the complaint reporting

You have an account in the AFM Portal. The AFM has sent you a demand for information. Go to the AFM Portal, log in and follow the instructions. Please create an account if you do not yet have an account in the AFM Portal. For details click <https://portaal.afm.nl>. Please note: even if you did not receive any complaints, you are still required to log on to the AFM Portal to explain why you did not receive any complaints.

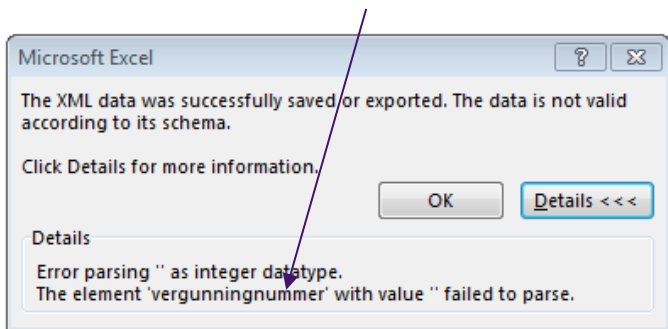
## 2.5 Q&A, common errors when saving as XML and how to fix them

**There is no notification that the validation succeeded.** No notification means that you successfully validated your file. You will only receive a notification if there is an error in the Excel data entry form you completed.

**Error message 'The data is not valid to its schema' when saving as XML file.** There is an error in the reporting. Click "Details" to find out which error the Excel data entry form has after the notification: The XML data was successfully saved or exported. **The data is not valid to its schema.** Click Details for more information.

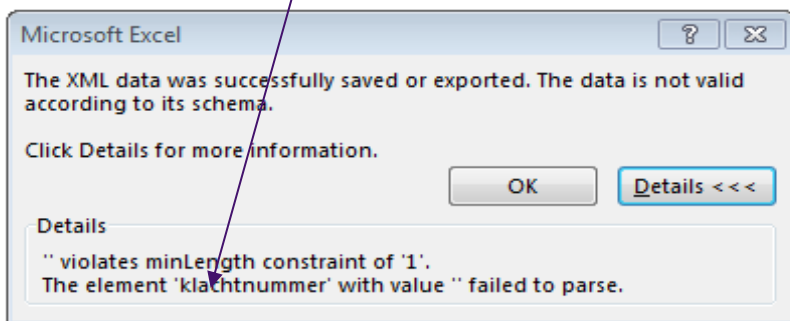
Klachtnummer	Datum binnenkomst klacht	Einddatum klacht	Status klacht	Kifid	Type Klager	Product	Oorzaak klacht	Productnaam
12345	1-1-2017		Open	Ja	Particulier	P007	Schadeaandeling	test langdurig openstaande klacht
23456	2-2-2021		Open	Nee	Zakelijk	B005	Schadeaandeling	ook langdurig openstaand
34567	1-1-2022		Open	Nee	Particulier	B008	Acceptatie	gewoon openstaand
45678	1-1-2017	05-05-2022	Afgesloten	Ja	Particulier	P003	Schadeaandeling	langdurig maar nu afgesloten
56789	1-5-2022	05-05-2022	Afgesloten	Nee	Particulier	L033	Medewerker	kortdurende klacht in hetzelfde jaar afgerond
67890	2-5-2022	10-10-2022	Afgesloten	Ja	Derde	A002	Schadeaandeling	gewone klacht via kifid

Error message: The element 'vergunningnummer' with value "" failed to parse.



**Error message: The element 'vergunningnummer' with value "" failed to parse.** This error message means that the licence number on the initial tab of the Excel data entry form is either empty or not filled in properly. The AFM sent you your eight-digit licence number in the request for information. You enter this licence number on the initial tab of the Excel data entry form. You can now re-save the Excel file as XML data.

**Error message: The element 'klachtnummer' with value "" failed to parse.** You receive the error message below under details.



It is usually caused by an empty complaint entry and on validating the database, the programme encounters a first cell whose complaint number is empty. Delete the empty cell or row and re-save the file again as XML database using the correct name. Should there be a number at value, it is not the line number of your reporting but the line number of the software running in the background.

Another source of error in a self-compiled report in which you have copied your own records in the [Excel data entry form](#), is when a description is outside the value range. As an example, the complaint here says closed "gesloten" as opposed to "Afgesloten", as a result of which the reporting cannot be submitted successfully to the AFM Portal. Please check to see whether the values fall within the range based on the "[KUV3 Definitions and range of values](#)" and the KUV1 technical specifications. If needed, use a data filter to check the column values.

	A	B	C	D	E	F	G	H	I
	Klachtenummer	Datum binnenkomst klacht	Einddatum klacht	Status klacht	Kifid	Type klager	Product	Oorzaak klacht	Productnaam
1	12021	1-1-2021	4-2-2023	Afgesloten	Nee	Particulier	B006	Acceptatie	commerciële productnaam
2	12023	1-1-2023		Open	Nee	Zakelijk	B005	Schadeafhandeling	productnaam
3	22023	1-1-2023	02-02-2023	gesloten	e	Particulier	P007	Acceptatie	productnaam
4									
5									
6									



## 2.6 Additional quality check by the AFM after the reporting has been submitted

As soon as the reporting has been submitted successfully, the pop-up notification ‘in behandelings’ will appear in the AFM Portal, which means ‘in process’. Depending on the size of your reporting and on how busy it is in the AFM Portal, this may take some time. Feel free to log out in the meantime, validation is done automatically. However, always perform a final check to see whether your report was submitted successfully.

If the complaint database does not meet the rules of validation, as explained in the content-related requirements and [KUV3 Definitions and range of values](#), a feedback pops up with details of the deficiencies in your database. If the report does however meet the technical requirements, you will see that it has been submitted successfully.

Please note that the AFM will always perform an additional quality check on your reporting, for example to check whether any outstanding complaints of the previous year have been reported using the same complaint number, and whether the lead time of complaints is not negative due to a switch between start date and end date. Should this be the case, the AFM will contact you and request you to submit an adjusted version.

## 3 Setup

### 3.1 Composition of the specification

The complete specification of the Complaints Survey for Insurers consists of multiple components, which are listed below. The previous paragraph indicated that the data to be submitted can be created in different ways. The components relevant for both methods described, ‘Excel’ and ‘Conversion’ respectively, are indicated below.

	Component	Explanation	Relevance for the method of file creation	
			Excel	Conversion
<b>KUV1</b>	This document	Describes the design of the survey, the definition of datapoints, the reporting process to be followed and submission requirements.	X	X
<b>KUV2</b>	Frequently Asked Questions (FAQ)	Listing of frequently asked questions related to this survey.	X	X
<b>KUV3</b>	“KUV3 Definitions and range of values”	Definitions of entries for which a value range applies, the values permitted and their individual meaning.	X	X
<b>KUV4</b>	“Excel invulblad”	The Excel data entry form that may be used to record complaint entries.	X	
<b>KUV5</b>	“Taxonomie (XSD)”	XML schema of the XML database to be submitted.		X

<b>KUV6</b>	“Waardenbereik referentiebestanden”	ZIP file with ranges of values for datapoints (where applicable).	X
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### 3.2 KUV3 - Definitions and range of values

A range of values is prescribed for certain datapoints. The [“KUV3 Definitions and range of values”](#) document has included a tab for each datapoint. Each tab stated the permitted values in Dutch in the first column. The subsequent columns list the translation and the definition of each specified value. This document serves as a reference for the values applied and their definitions, because the reporting is in Dutch.

### 3.3 KUV4 - Excel data entry form

[The Excel data entry form](#) is intended for institutions that do not have a formal or informal in-house complaints register. Complaint entries can be filled in the Excel data entry form as per the requirements specified here. The form needs to be saved as XML database in order to be able to submit it. Please note that the permitted values need to be in Dutch in the Excel data entry form in order to meet the technical requirements and to be able to be validated. The KUV3 Definitions and range of values lists the translations of the definitions and the permitted values enabling you to correctly fill in the Excel data entry form.

### 3.4 KUV5 - Taxonomy (XSD)

The KUV5- Taxonomy (XSD) is the XML Schema Definition (XSD) with the specifications of datapoints and quality regulations. Institutions that wish to generate the required XML database by means of conversion can use the XSD to this end. Please note that the permitted values need to be in Dutch to meet the technical requirements and to be able to be validated. [The KUV3 Definitions and range of values](#) lists the translations of the definitions and the permitted values.

### 3.4 KUV6 - Range of values reference files

KUV6 is a zip file and consists of separate text files. For each datapoint for which a range of values is prescribed, a separate text file is included with the permitted values in UTF8. These files may be used as a reference when institutions develop conversion software to generate the required dataset from their in-house complaints administration. Please note that the permitted values are in Dutch and that these need to be used to be able to successfully validate and submit the reporting. The [KUV3 Definitions and range of values](#) lists the translations of the definitions and the permitted values.

## 4 Selection Criteria

Institutions have to report their complaint entries over a specified period. This Chapter defines the criteria that determine which complaint entries need to be selected for the reporting.

### 4.1 Reporting period & Reporting moment

The reporting period is the period over which institutions have to report their complaint entries. A period is defined as a time period with a start and end date.

#### **This survey relates to the 2023 Reporting period**

This period is defined by the range between 1 January 2023, this being the start date of the reporting period, and 31 December 2023, which is the end date of the reporting period.

The reporting moment is the moment in time on which the complaint entries to be reported and their data values are determined. Also see § 4.3.

## 4.2 Selection rules

Complaints covered by the reporting period have to be reported within the framework of this survey. In order to arrive at a correct selection of complaint entries, institutions must apply the following selection rules:

### Selection rule 1:

*'Complaints closed within reporting period'*

*End date of the complaint  $\geq$  Start date of the Reporting period AND the End date of the Complaint  $\leq$  End date of the Reporting period*

Based on this selection, all complaint entries that were closed during the reporting period are selected.

### Selection rule 2:

*'Outstanding complaints at the end date of the reporting period'*

*Date the Complaint was received  $\geq$  End date of the Reporting period AND (the End date of the Complaint is empty OR the End date of the Complaint  $\geq$  End date of the Reporting period)*

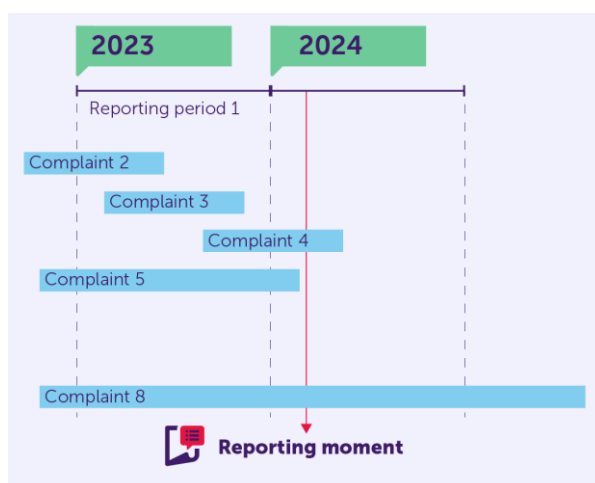
This selects complaint entries that were still pending at the time of the end date of the reporting period.

Appendix 1 provides a schematic explanation of how the selection rules work.

## 4.3 Situation at the reporting moment

Institutions may report the values of the requested datapoints as these are at the time of the reporting moment. This approach was chosen to ease the reporting burden.

As an alternative, the values could also be reported at the end of the reporting period. Given that the characteristics of a complaint may still change between the end date of the reporting period and the reporting moment, this alternative would mean that institutions have to historically reconstruct from their records the state of a complaint to the time of the end of the reporting period. The AFM expects that this may not always be possible for technical reasons. The figure below illustrates the meaning:



The figure above shows the situation in which complaint entries need to be reported over 2023. Since, in the context of this survey, reporting is done retrospectively, the moment at which institutions compile the dataset (i.e. the reporting moment) principally lies after the end of the reporting period. In this situation, it is permitted to use the state of a complaint entry at the time of the reporting. For example, complaint 5 will have the status 'Open' at the end of the reporting period but 'Closed' at the reporting moment. In this situation, it is thus allowed to report the last known status, i.e. Closed.

## 5 Submission requirements

The following requirements apply to the submission of the respective complaint entries:

No	Requirement	Explanation
1	Submission via XML	Institutions have to submit the requested complaint entries in an XML data format according to the prescribed XSD. Make sure that you opt for XML data and not XML spreadsheet.
2	One file for each licensee	A separate XML file has to be submitted for each licence number.
3	Application of the selection rules	The complaint entries that are reported have to comply with the selection rules applicable for this reporting period. Please note that any outstanding complaint numbers from the previous year need to be resubmitted with the same complaint number and a possible new status.
4	No complaint entries to be reported	Licensees do not need to submit a file if there are no complaint entries that match the selection rules in the reporting period. If this situation applies to a licensee, the licensee can indicate such in the AFM Portal.
5	Use of the Excel data entry form	Parties may use the Excel data entry form "Excel invulblad" to compile the required XML file.
6	File name	The file name of the XML database to be submitted must meet the following syntax, in the form of XML data: <ul style="list-style-type: none"> <li>• Ownnamereporting.xml</li> </ul>

### 5.1 Use of the Excel data entry form

If you make use of the [Excel data entry form](#), you need to consider the following.

### 5.2 Saving as an XML file

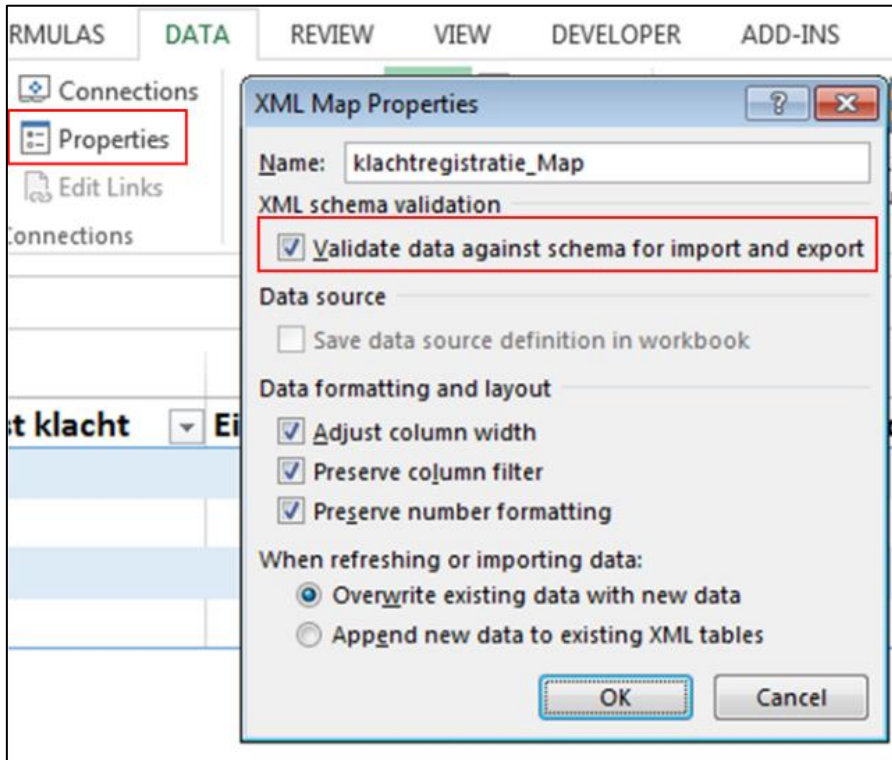
To save the data in the Excel data entry form as a valid XML file, you need choose 'Save As / Opslaan Als' and select the 'XML Data' type. Make sure you do not select XML spreadsheet.

Ownnamereport

XML Data(\*.xml) ▼

## 5.3 Validation

When saving as XML, the data is automatically validated if the option 'Validate data against schema for import and export' is checked in the Data / Properties menu:



This validation checks to see whether:

- All fields have been completed. The initial tab contains the licence number.
- The values entered meet specified value ranges. See [KUV3 Definitions and range of values](#).
- Values meet other technical requirements.

If the data does not meet these requirements, a notification will pop up on the screen, but the file will still be saved. You should then ensure that the deficiencies identified are resolved in the data. You can do so by making the appropriate corrections in the Excel data entry form and resaving the data, and thus revalidating it.

Saving as XML Data automatically ensures the application of correct data types.

## 6 Substantive requirements

This Chapter describes the requested datapoints. These datapoints are listed below and further specified in Paragraphs 0 and 0. A number of conventions:

- *X-path* refers to the location in the XSD.
- *Range of values* indicates whether a value range is required for the datapoint in question.
- *Functional requirements* describes further requirements with which the datapoint needs to comply functionally.
- *Technical requirements* describes additional requirements with which the datapoint needs to comply technically.

Upon submission, an XML file is validated against the XSD. If the XML submission does not comply with the XSD, the submission will be refused. The XSD is used to validate whether:

- The datapoints reported meet the technical requirements. Please note that the datapoints are in Dutch and are spelled exactly as indicated in the [KUV3 Definitions and range of values](#).
- All fields are reported per complaint entry.
- The correct data type per element is applied.
- Stated values meet the range of values where applicable.

NB: when using the [Excel data entry form](#), the aforementioned validations are performed automatically when the data is saved as an XML file. Also see § 0.

### 6.1 File header

In the file header, the “Vergunningnummer”, licence number, and the “Rapportageperiode”, reporting period, are included once.

#### 6.1.1 Licence number

Datapoint	“Vergunningnummer” means Licence Number
X-path	Complaint registration / licensee / licence number
Definition	The licence number listed in the request for information which the Dutch Authority for the Financial Markets sent you. You enter your licence number on the initial tab of the <a href="#">Excel data entry form</a> .
Functional requirements	
Technical requirements	
Mandatory Y/N	Y
Data type	Integrity (8) [0-9]
Range of values	N

#### 6.1.2 Reporting period

Datapoint	“Rapportageperiode” means reporting period
X-path	Complaint registration / licensee / reporting period
Definition	See § 4.1
Functional requirements	
Technical requirements	
Mandatory Y/N	Y

Data type	Integrity (4)
Range of values	Needs to be value '2023' (no quotations)

## 6.2 Detailed rules

The datapoints below are recorded for each complaint entry. The indication of the X-path location is relative to the element complaint registration/licensee/complaint.

### 6.2.1 Complaint number

<b>Datapoint</b>	<b>“Klachtnummer” means complaint number</b>
<b>X-path</b>	Complaint number
<b>Definition</b>	A unique and anonymous number that uniquely identifies a complaint.
<b>Functional requirements</b>	<ul style="list-style-type: none"> <li>A complaint number needs to be able to uniquely identify a complaint. When the same complaint is reported in successive reporting periods, the same unique complaint number should be used each time it is reported to identify the complaint in question. Please note that if you still had any outstanding complaints from 2022 or before at the beginning of 2023, you will have to report them under <u>the same complaint number in 2023 as well</u>.</li> <li>The complaint number has to be a unique number. A complaint number may never be reused to identify another complaint. This means you cannot each year reuse complaint numbers that have already been closed in previous years, for example, for new complaints.</li> <li>The complaint number has to be anonymous for the AFM. It should not be possible for the AFM to identify the concerned parties in person based on the complaint number. The AFM therefore does not want the complaint numbers from your administration, but anonymous complaint numbers linked to them.</li> <li>Institutions may apply a numbering system by their own choosing provided the system meets the aforementioned functional requirements and the prescribed data type.</li> </ul>
<b>Technical requirements</b>	Complaint numbers have to be unique.
<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Varchar (64)
<b>Range of values</b>	N

### 6.2.2 Date the complaint was received

<b>Datapoint</b>	<b>“Datum binnenkomst klacht” means the date the complaint was received</b>
<b>X-path</b>	Receipt of the complaint
<b>Definition</b>	The date on which the insurer received the complaint.
<b>Functional requirements</b>	<ul style="list-style-type: none"> <li>The date on which the complaint was first registered in the insurer’s records may be used for this datapoint.</li> <li>The specified date must be greater than or equal to 1 January 2013<sup>2</sup>.</li> </ul>
<b>Technical requirements</b>	<ul style="list-style-type: none"> <li>Date format consistent with ISO 8601, YYYY-MM-DD</li> <li>Date &gt;= 1-1-2013</li> </ul>

<sup>2</sup> This start date follows the date the EIOPA Guidelines came into force (November 2012).

<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Date
<b>Range of values</b>	N

### 6.2.3 End date of the complaint

<b>Datapoint</b>	<b>“Einddatum klacht” means the end date of the complaint</b>
<b>X-path</b>	Conclusion of the complaint
<b>Definition</b>	The date on which the insurer closes the complaint in its internal complaint registration.
<b>Functional requirements</b>	If the end date of the complaint is entered, the Status of the complaint may not have the ‘Open’ value.
<b>Technical requirements</b>	<ul style="list-style-type: none"> <li>• Date format consistent with ISO 8601, YYYY-MM-DD</li> <li>• Date &gt;= 1-1-2023<sup>3</sup></li> </ul>
<b>Mandatory Y/N</b>	Y if the complaint status is closed.
<b>Data type</b>	Date
<b>Range of values</b>	N

### 6.2.4 Status of the complaint

<b>Datapoint</b>	<b>“Status klacht” means the status of the complaint</b>
<b>X-path</b>	Status of the complaint
<b>Definition</b>	The handling status of the complaint at the time of reporting.
<b>Functional requirements</b>	The reported value must contain one of the values from the range of values.
<b>Technical requirements</b>	The reported value must contain one of the values from the range of values. Please note that this datapoint is in Dutch. Its translation is in <a href="#">KUV3 Definitions and range of values</a> .
<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Varchar
<b>Range of values</b>	Y

### 6.2.5 Kifid

<b>Datapoint</b>	<b>“Kifid” is a dispute resolution body</b>
<b>X-path</b>	Kifid or SKGZ status for a complaint
<b>Definition</b>	Indication of whether the complaint has also been reported to Kifid or the Health Insurance Industry Disputes Committee (SKGZ). Kifid and SKGZ are two dispute resolution bodies in the Netherlands (this means a Ombudsman).
<b>Functional requirements</b>	The reported value must contain one of the values from the range of values.

<sup>3</sup> This requirement stems from the application of the selection rules (see § 0).



<b>Technical requirements</b>	The reported value must contain one of the values from the range of values. Please note that this datapoint is in Dutch. Its translation is in <a href="#">KUV3 Definitions and range of values</a> .
<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Varchar
<b>Range of values</b>	Y

## 6.2.6 Type of complainant

<b>Datapoint</b>	<b>“Type klager” means type of complainant</b>
<b>X-path</b>	Type of complainant involved in a complaint
<b>Definition</b>	Characterisation of the party that filed the respective complaint.
<b>Functional requirements</b>	The reported value must contain one of the values from the range of values.
<b>Technical requirements</b>	The reported value must contain one of the values from the range of values. Please note that this datapoint is in Dutch. Its translation is in <a href="#">KUV3 Definitions and range of values</a> .
<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Varchar
<b>Range of values</b>	Y

## 6.2.7 Product

<b>Datapoint</b>	<b>“Product” means product code</b>
<b>X-path</b>	Product code
<b>Definition</b>	The type of product to which a complaint relates.
<b>Functional requirements</b>	The reported value must contain one of the values from the range of values.
<b>Technical requirements</b>	The product code must be specified as the data value. The product name may not be used. Please note that this datapoint is in Dutch. Its translation is in <a href="#">KUV3 Definitions and range of values</a> .
<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Varchar
<b>Range of values</b>	Y

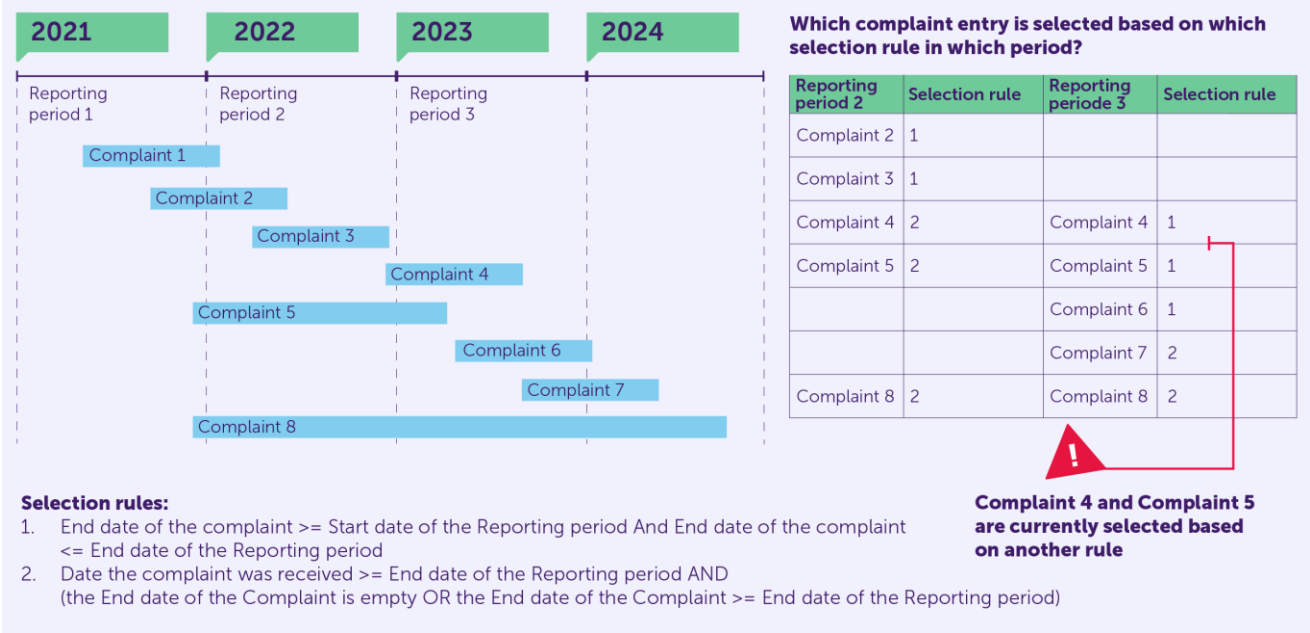
## 6.2.8 Reason for the complaint

<b>Datapoint</b>	<b>“Oorzaak klacht” means reason for the complaint</b>
<b>X-path</b>	Reason for the complaint
<b>Definition</b>	Characterisation of the cause underlying the complaint.
<b>Functional requirements</b>	The reported value must contain one of the values from the range of values.
<b>Technical requirements</b>	The reported value must contain one of the values from the range of values. Please note that this datapoint is in Dutch. Its translation is in <a href="#">KUV3 Definitions and range of values</a> .
<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Varchar
<b>Range of values</b>	Y

## 6.2.9 Product name

<b>Datapoint</b>	<b>“Productnaam” means product name</b>
<b>X-path</b>	Commercial product name involved in the complaint
<b>Definition</b>	The commercial product name as known by your customers and in use by the insurer to which the complaint relates. The product name by which your client knows the product.
<b>Functional requirements</b>	n/a
<b>Technical requirements</b>	n/a
<b>Mandatory Y/N</b>	Y
<b>Data type</b>	Varchar (255)
<b>Range of values</b>	N

# Appendix 1 – Illustration of the operation of the selection rules



# Appendix 2 – Definition of terms

- “Verzekeraar”** “Verzekeraar” means insurer. This is a life insurer, a funeral expenses and benefits in kind insurer or non-life insurer; not a reinsurer.
- “Klacht”** “Klacht” means complaint. This is a statement of dissatisfaction addressed to an insurance undertaking by a person or legal entity relating to the insurance contract or service he/she has been provided with. Complaints-handling should be differentiated from claims-handling as well as from simple requests for execution of the contract, information or clarification. This latter part (claims-handling and simple requests) is not covered by the definition of a complaint.
- “Klager”** “Klager” means complainant. This is a natural person or legal entity who has filed a complaint with an insurance company. The natural person or legal entity could, for example, be a (potential) policyholder, insured party, beneficiary, intermediary or an aggrieved third party.
- “Verzekering”** “Verzekering” means insurance. This is life insurance, funeral expenses and benefits in kind insurance or non-life insurance (including income protection insurance and healthcare insurance); not a reinsurance.

**“Pakketverzekering or  
collectieve  
verzekering”**

“Pakketverzekering or collectieve verzekering” means package policy or group insurance scheme. This is a ‘category policy or package policy’ that may include coverage for more than one type of insurance or object, consider homeowner’s insurance with separate awning insurance cover or car insurance with accidental occupant insurance or legal expenses cover, which counts as one policy for the category to which the main policy belongs. A package policy consists of various products, meaning that a complaint about one of these products needs to be registered in the category to which the product or specific cover belongs. In the case of group insurance schemes with underlying participants, the group insurance always amounts to one policy, except for fleets: in that case one policy applies to each car.



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