



## Complaint Handling Procedure of CardPay Ltd

Number CP-CH-01/2015 Approved on 21.10.2015 In force form 22.10.2015

### 1. General Provisions

- 1.1. CardPay Ltd is a limited liability company duly incorporated in the Republic of Cyprus with the incorporation number HE 328641.
- 1.2. The Company is an Electronic Money Institution licensed by the Central Bank of Cyprus to operate an electronic money institution under the license number A.115.1.3.7.
- 1.3. The Company is supervised and regulated by the Central Bank of Cyprus.
- 1.4. It is the policy of the Company that complaints are addressed, investigated and promptly resolved.
- 1.5. The Company is required to have in place and make available to its Customers a procedure for dealing with complaints. The process of submitting complaints by complainants and accepting and resolving complaints by the Company is described in this document.
- 1.6. Complaint Handling Procedure shall be available to Customers of the Company through the Company's website.

### 2. Definitions:

**Complaint** – a statement of dissatisfaction addressed to the Company relating to the provision of the Company's services.

**Complainant** - a person who is presumed to be eligible to have a Complaint considered by the Company and who has already lodged a Complaint.

**Customer** – a legal entity or individual that has established business relationships with the Company or receives services from the Company.

**Company** – CardPay Ltd.

### 3. Complaints:

#### 3.1. General principles of dealing with complaints:

3.1.1. The Company shall ensure confidentiality of all Complaints.

3.1.2. The Company intends to resolve all Complaints fairly and within reasonable time.

3.1.3. The Company intends to maintain Customers' confidence and trust in services provided by the Company.

#### 3.2. Complaint Categories:

3.2.1. Complaints shall fall into following categories, according to the nature of alleged misadministration by the Company:

- Complainant's account and transactions performed on the account.
- Dissatisfaction with the Company's services or actions of its employees.
- Violation of the Complainant's rights under the law or any of the agreements between the Customer and the Company.
- Complaints from non-customers.

### 3.3. Verbal Complaints:

- 3.3.1. Verbal Complaints - Complaints that do not require response or action from the Company, for example, general criticism of the Company, dissatisfaction with the standard of services or actions of the Company's employees. Verbal Complaints may be communicated to the employees of the Company over any means of voice communication.
- 3.3.2. The Company may respond or take action with regards to the particular Verbal Complaint at its sole discretion.
- 3.3.3. No Verbal Complaints shall be accepted with regards to Customer's account or any transactions.

### 3.4. Written Complaints:

- 3.4.1. Written Complaints – Complaints that require response or action on behalf of the Company.
- 3.4.2. In order to accept, record, analyse, take action and respond to the Complaint, it must be in writing and, where applicable, shall include the following information: the Customer's name, account number, type, date and number of transaction that caused the Complaint, description of the issue, remedy sought by the Complainant and other observations, grounds and evidence as the case may be.
- 3.4.3. Complaints may be sent to the e-mail address of a relationship manager who communicates with the Complainant/Customer on behalf of the Company or to the contact e-mail address available at the Company's website.
- 3.4.4. Complaints may be filed electronically through the Company's internet banking system or via "Contact us" form available at the Company's website.
- 3.4.5. Complaints may be sent by post to the Company's mailing address available at its website or delivered to that address personally by the Complainant.
- 3.4.6. The Company will not be able to accept and address any Complaint relating to the Customer's account or any transactions if the Complaint does not fulfil the requirements set forth by the section 3.4.2. Complainants will have to comply with these requirements for their Complaints to be acknowledged and resolved.

### 3.5. Complaints Handling Process

- 3.5.1. In order to resolve the Complaint in a fair amicable way, the Complainant shall cooperate with the Company, perform any necessary actions and provide all requested information and documents.
- 3.5.2. The Company shall maintain record of incoming Complaints and their resolution. The Company shall retain all documents relating to Customers' Complaints, including initial Complaint notification, correspondence with\from the Customer, all documents used for investigating the Complaint.
- 3.5.3. Compliance Officer of the Company shall consider acceptability of each Complaint. In case the Complaint deals with alleged fault in performance of the Company's services or infringement of Customer's rights under the law or any agreements between the Customer and the Company, Compliance Officer shall accept and acknowledge the Complaint and ensure that the Complainant is informed about the time frame for its investigation and resolution.

- 3.5.4.If the Complaint is not related to provision of services by the Company or it is related to the activities of another entity for which the Company has no legal or regulatory responsibility, the Complainant shall be informed that the Complaint cannot be addressed by the Company.
- 3.5.5.Within reasonable time period the Company shall investigate all acknowledged Complaints by obtaining all information available about the disputed issue, including but not limited to the Company's records and Complainant's transaction history.
- 3.5.6.Compliance Officer shall ensure the Complainant is informed about the Company's decision regarding the Complaint.
- 3.5.7.In order to inform the Complainant of the Company's final decision regarding the Complaint, the Company may contact the Complainant in any way available, using the contact information registered with the Company: e-mail, postal address, etc.
- 3.5.8.Compliance Officer shall ensure that the Complainant receives initial response from the Company electronically within 30 days from the date of Complaint acceptance. If the issue requires a more thorough investigation and cannot be resolved within 30 days, the Company shall send the Complainant a notification informing him/her that the Company shall contact the Complainant when it reaches the outcome of investigation.
- 3.5.9.When the Company arrives at a resolution of the Complaint, the Company shall inform the Complainant of the results and remedial actions, if any, to be taken by the Company.

#### **4. Miscellaneous:**

- 4.1. This Complaint Handling Procedure does not affect the Customer's right to take his Complaint to the Central Bank of Cyprus, ombudsman or other competent authority. If the Complainant is dissatisfied with the Company's final decision and the response from the competent authority, he is entitled to take legal action.
- 4.2. All complaints, as well as any disputes between the Company and its Customers shall be dealt with in Cyprus, in accordance with the Company's regulations regarding Complaint handling and applicable laws of the Republic of Cyprus.
- 4.3. All questions regarding the process of dealing with Complaints can be directed to:
- The particular relationship manager who communicates with the Customer.
  - The mailing address of the Company available at its website.
  - "Contact us" form available at the Company's website.
  - Contact e-mail address available at the Company's website.