

### 1. Introduction

- 1.1. Cardpay Ltd (the “Company”) is a limited liability company registered in Cyprus (reg. number HE 328641) and is an Electronic Money Institution licensed and regulated by the Central Bank of Cyprus (license number 115.1.3.7).

### 2. Our principles of Complaint handling

- 2.1. We are committed to offering the highest levels services at all times. However, this doesn’t guarantee that complaints relating to our services or our staff will not arise from time to time. If you are not satisfied with our products/services, you can submit your complaint and offer us the opportunity to improve, resolve any issue and ensure it does not repeat in the future.
- 2.2. We have formal procedures for handling complaints fairly and promptly, aiming to resolve any complaint in a reasonable and objective manner. Complaints submitted to the Company shall be dealt with in Cyprus in accordance with the complaint procedures set forth herein, internal regulations of the Company and applicable laws of the Republic of Cyprus.

### 3. Submitting inquiries/complaints

- 3.1. Any inquiries, questions, concerns should first be addressed to your Relationship Manager directly. Several issues can be resolved easily and swiftly through direct contact with your personal Relationship Manager or the Head of their Department.
- 3.2. Inquiries, questions, concerns are handled in the order that they are received by within 5 business days. Your Relationship Manager/Head of the Department aim to resolve any issue received within 15 business days in cooperation with relevant departments of the Company.
- 3.3. If you receive a response from the Relationship Manager or the Head of the Department, but believe your case is unresolved, you may submit a formal complaint to the Compliance Department, which is an independent Department of the Company, whose role is to impartially review complaints and oversee the complaint handling process.

### 4. Requirements to Complaints

- 4.1. Formal complaints must be received in writing by the Company and include all the details specified in the Complaint Form available on the Company’s website. Please download the form [here](#).
- 4.2. All complaints must include:
- Full name
  - Address
  - Contact details (telephone number and email)
  - Payment account number and/or Card Account and Card number.
  - Detailed description of the complaint (including date the incident occurred, if applicable information on affected transactions, and desired outcome)
  - Supporting evidence (e.g. screenshots, communication etc.)

4.3. The complaint can be submitted in two ways:

- Electronically, via email: By sending the Complaint Form and documents to the email address : [complaints@cy.cardpay.com](mailto:complaints@cy.cardpay.com)
- In hard copy via post/courier/personal delivery: By transmitting the Complaint Form and documents to the below address:  
Compliance Department  
Cardpay Ltd  
125 Georgiou Griva Digeni  
Limassol 3101  
Cyprus

4.4. Any complaint must be submitted as specified above, in writing, in English in a clear and comprehensible manner. No oral or handwritten complaints will be accepted.

4.5. The information provided to the Company must be accurate, complete and up-to-date, to enable an appropriate investigation and evaluation of your complaint. We may request further information and/or clarifications and/or evidence in relation to your complaint. Moreover, we may request that you re-submit a new Complaint Form in case it is considered that you have incorrectly and/or incompletely and/or falsely completed the Complaint Form.

4.6. We reserve the right to reject complaints based on false or misleading information, complaints unsubstantiated by supporting evidence or in cases of deliberate withholding or non-disclosure of information and evidence in relation to the complaint. Submitting false or misleading information is a serious offense and we reserve the right to proceed with legal action in such circumstances, including in cases where the Company suffers financial or reputational damage in any form whatsoever.

## 5. Complaint handling process

### Acknowledgement

- 5.1. After receipt of your complaint submitted in accordance with the requirements described above, we will send you a written acknowledgement (via email or post) within five (5) business days of receipt, to inform you that the Company is in receipt of the complaint and that it will be investigated in a timely manner.
- 5.2. Our Compliance Department considers the acceptability of each Complaint. Complaints related to an alleged fault in performance of the Company's services or infringement of rights under the law or agreements with the Company shall be dealt with in accordance with this Complaints Handling Policy, internal regulations of the Company and applicable legislation. In case the Complaint is not related to the provision of services by the Company or is related to the activities of another entity for which the Company has no legal or regulatory responsibility, you shall be informed that the Complaint cannot be addressed by the Company.

### Investigation

- 5.3. Once we acknowledge receipt of your complaint, we will review it carefully, conduct internal investigations in cooperation with relevant departments of the Company, and will try to resolve it without undue delay.
- 5.4. During the investigation process we will keep you updated on the handling process of your complaint. One of our officers may contact you directly (including by email or phone) in order to obtain, where

needed, further clarifications and information relating to your complaint. Your full cooperation is required in order to expedite the investigation and possible resolution of your complaint.

- 5.5. Depending on the nature and the particulars, we will try to find ways to resolve the issue and propose a resolution to you as soon as possible. We will try to resolve your complaint on the basis of good faith, fairness and by taking such action as is consistent with market practice.

### **Resolving**

- 5.6. Upon completion of the investigation, you will be informed on the proposed solutions/answers.
- 5.7. We shall make every effort to respond to the complaint within fifteen (15) days of receipt.
- 5.8. In the event that your complaint is more complex and requires further investigation and we cannot resolve it within fifteen (15) days, we will issue a holding response in writing (via email or post). When a holding response is sent, it will indicate the causes for the delay, current status, and when the Company's investigation is likely to be completed. In such a case we will keep you updated on the handling process.

### **Final Response to complaints**

- 5.9. You will receive our final response no later than thirty-five (35) business days from the date of the initial receipt of your complaint.
- 5.10. Please note that the Company shall consider your complaint closed and cease the relevant investigation in case you fail to respond to our officers within the period of thirty-five (35) business days from the date of the submission of your complaint. When we reach an outcome, we will inform you of it together with an explanation of our position and any remedial measures we intend to take (if applicable).
- 5.11. In case you have received our final response but are not satisfied with it, you may within four (4) months from the date of receipt of the final response submit your complaint to the Financial Ombudsman. In case you have not received our response within thirty-five (35) business days from the date of the initial receipt of your complaint, you may submit your complaint to the Financial Ombudsman. More information on eligibility and requirements for submitting complaints to the Ombudsman is available on the Ombudsman's website indicated below.

### **Financial Ombudsman of the Republic of Cyprus**

[www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)

Address: 13 Lord Byron Avenue, 1096 Nicosia

Postal Address: P.O.Box 25735, 1311 Nicosia

Tel. +357 22 84 89 00 Fax. +357 22 66 05 84

- 5.12. You may also maintain your complaint with the Central Bank of Cyprus.

### **Central Bank of Cyprus**

[www.centralbank.cy](http://www.centralbank.cy)

Address: 80 Kennedy Avenue, 1076 Nicosia

Postal address: P.O.Box 25529, 1395 Nicosia

Tel. +357 22 71 41 00 Fax. +357 22 71 49 59

- 5.13. Your right to take legal action remains unaffected by the use of any complaint procedures referred to above.