

Complaints Policy

Payswix, UAB (payswix or Company) is an Electronic Money Institution, authorized by the Central Bank of Lithuania (License No. 21) for the issuing of electronic money.

1. THE PURPOSE OF THIS POLICY

Here at Payswix, UAB we are committed to provide our Customers the best service possible with full transparency. We understand how important feedback and criticism are to maintain a successful business; hence, we have implemented the current Complaint Policy in order to enable our Customers with a possibility to express their feedback and to make sure it is handled within the Company. We take all Queries and Complaints seriously and strive to resolve them as quickly as possible. Below you can find the steps and actions we take once your Query or Complaint is received.

The filing of Queries and Complaints and Complaints handling process at Payswix, UAB is free of charge.

2. TERMS WE USE IN THIS POLICY

Customer – a legal entity or a natural person that is registered in payswix system and holds an account and to which payswix already provides services or which applies to payswix for potential provision of services. For the purpose of this Complaints Policy the Complaints Policy shall also be addressed to former Customers of payswix and to successors in title of a payswix Customers.

Complaint – a written expression by e-mail or post of dissatisfaction of the Customer addressed to Payswix, UAB claiming that the rights and / or legitimate interests of the person filing the complaint have been violated in relation to the services provided by Payswix, UAB or agreements concluded with payswix, and asking for satisfaction of the claims.

Complainant – the person making the Complaint.

Consumer – shall mean a natural person who is registered in payswix and does not pursue aims which are consistent with the business, commercial, or professional activity of this person.

Support Specialist – the employee assigned to your Complaint.



Complaints Policy – this complaints policy which is available to our Customers.

Feedback notice – a written confirmation of the outcome of your Complaint we provide.

EMI – electronic money institution.

Query – your question or concern addressed to Payswix, UAB related to the products or services of Payswix, UAB and where the answer can be prepared immediately, or the question can be resolved during the contact with you. If the Query includes a claim towards Payswix, UAB and does not seek to only receive advice re certain matter, such Query shall be qualified as Complaint.

3. WHEN TO QUERY AND WHEN TO COMPLAIN

Please feel free to contact us in case you have any questions about our services, require assistance about your account, transactions or have an Inquiry of similar nature. You have the right to formally complain under this Complaint Policy if you believe we have violated an agreement or law, have caused any harm, prejudice or considerable inconvenience, have treated you unfairly, or if you would like to express your discontent about our services and/or products in any other way.

4. PHISHING AND FRAUD INCIDENTS

Here at Payswix, UAB we sympathize with those who have become victims to fraudulent activities. It is one of our main concerns as an EMI. We are fully committed to keeping our platform safe and our Customers protected. If you suspect you became a victim of fraud, please report it by submitting a ticket by means specified in **section 6** and **7** to our support team as soon as possible. We will take the relevant action. However, please be aware it is one of your responsibilities as a Customer to select who you provide your personal information to. Payswix, UAB cannot be held responsible for loss of funds if you have become a victim of fraud unless such liability would be established by law. payswix shall be liable for direct losses of the Client occurred due to unauthorized or incorrectly executed Payment operations (due to payswix error) only if the Client notifies payswix on becoming aware of any such Payment operation giving rise to a claim and no later than within 3 (three) months after the debit date, save for the cases in this Agreement that explicitly indicates Client's liability. If the Client does not submit this notification within the indicated time period, it is considered that Client has unconditionally agreed to the Payment operation, that has been executed on the Client's payswix account.



5. WHO MAY COMPLAIN OR SUBMIT QUERIES?

Anyone can submit a Complaint or Query to us if you have a direct interest in the subject matter of the Complaint or Query. This means that you could be:

- A payswix Customer;
- A former payswix Customer;
- A potential payswix Customer;
- The successor in title of a payswix Customer;
- A person with a right to act on behalf of one of the above individuals (for example, as a trustee, curator, executor or similar legally-appointed official).

6. WHAT TO INCLUDE IN A QUERY?

1. Your full legal name and surname or company name and (if possible) your registered account information;
2. An email address from which to receive communication about your Complaint;
3. Explanation on what matter Payswix, UAB assistance is required.

A Query can be submitted to Payswix, UAB by your representative. In such a case representative's power of attorney or other document stating their right to act on behalf of you should be submitted together with the Query.

7. WHAT TO INCLUDE IN A COMPLAINT?

1. Your full legal name and surname or company name and (if possible) your registered account information;
2. An email address from which to receive communication about your Complaint;
3. A full description of your Complaint.
4. Claim to the Company.
5. Evidence, documents, correspondence, attachments or any other information that could help us with the investigation of your Complaint.



A Complaint can be submitted to payswix by your representative. In such a case representative's power of attorney or other document stating their right to act on behalf of you should be submitted together with the Complaint.

Anonymous Complaints shall not be accepted and examined, unless the issue raised in the Complaint is important to Payswix, UAB activities or Company's good repute or otherwise requires attention from payswix.

If your Complaint is incomplete or information is missing, details are too vague, Payswix, UAB might contact you for additional information, documents or any other details. If you will not provide requested information and / or documents, we will not be able to resolve your Complaint and thus your Complaint may be dismissed. payswix will notify you in case your Complaint is dismissed explaining the reason of such dismissal.

8. HOW TO CONTACT US

The Customer may submit a Query or Complaint in writing by:

- email to support@payswix.com ; or
- sending the notification via personal account in the Company's system; or
- post to Payswix, UAB office.

Queries might also be expressed orally by contacting Customer Support Centre.

The Customer's Queries provided orally are answered during the conversation and the Customer is always informed that written response is provided only to written Queries and Complaints.

Please note that all Queries and Complaints must be in Lithuanian or English language.

Please read **section 7** carefully before submitting your Complaint.

9. HOW THE QUERY WILL BE HANDLED AT PAYSWIX

1. In case you contact us by calling to Customer Support Centre, the answer to your Query will be



- provided during the call.
2. In case you submit a written Query, a Support Specialist will be assigned to your Query and will acknowledge the receipt of your Query within 1 Business Day, via email to the email address provided in your Query.
 3. If Support Specialist can resolve your Query immediately, you will receive an answer to your Query at the same time as the acknowledgement.
 4. In case that Query is more complex and cannot be resolved immediately, it will be investigated further. We might contact you in case we need additional information or any other details. We will try to resolve your Query within 5 business days. However, in case any unforeseen circumstances arise, we might take longer. Nevertheless, we will keep updating you along the way.
 5. Once the Query is resolved and final answer sent to the email address provided in your Query, the Support Specialist makes the following entries in the Queries register:
 - a. Date of the final answer;
 - b. What actions has been taken to resolve the Query.

10. HOW THE COMPLAINT WILL BE HANDLED AT PAYSWIX

Once we have received your Complaint containing all of the necessary details, you can expect the Complaint to be handled as follows:

1. A Support Specialist will be assigned to your Complaint and will acknowledge the receipt of your complaint within 1 Business Day, via email to the email address provided in your Complaint.
2. If the Support Specialist can resolve your Complaint immediately, you will receive Feedback notice at the same time as the acknowledgement.
3. In case that Complaint is more complex and cannot be resolved immediately, it will be investigated further. We might contact you in case we need additional information or any other details. We will try to resolve your issue within 5 business days. However, in case any unforeseen circumstances arise, we might take longer. Nevertheless, we will keep updating you along the way if we cannot provide you with the Feedback notice within 15 business days. In such case the Company will send you a preliminary Feedback notice which will clearly indicate



the reasons for delay in replying and the term by which you will receive a final Feedback notice that shall in any case not exceed 35 business days in total.

4. Feedback notice will be sent to your email address indicated in the Complaint and it will include following, when applicable:
 - a. Where your Complaint was accepted and how your Complaint was resolved / or how the claim will be satisfied where you have requested specific action or redress;
 - b. Where your Complaint was rejected and the reasons for this decision, including where you have requested specific action or redress and such specific action or redress is not possible;
 - c. References to information or documents on which the Company relied when making a decision;
 - d. Possible further steps which may be available to you, including the right to reach out to the court if the Complaint was rejected.
5. Once the Feedback notice is sent the Support Specialist makes the following entries in the Complaints register:
 - a. Date of the Feedback notice;
 - b. The decision (final result of the Complaint examination).

Justifying the Feedback notice regarding the Complaint filed by the Customer, the Company must ensure that the response is formulated as clearly and comprehensively as possible. All responsible persons under this section are committed to reply with objectivity and decisions will be made on the basis of the facts.

Should you feel that the decision (Feedback notice) was unfair or incorrect, you may request that the matter be reviewed again. This process will involve the following:

1. You may request for the matter to be reviewed again by sending a written request within 7 days of receiving our Feedback notice. You must include written reasons for taking the matter for review again.
2. The review will be referred to the higher Management for consideration. They will acknowledge your request to review the matter within 3 Business Days, by email to the email address provided in your Complaint.
3. Higher will investigate and decide on the matter within 5 business days. During this time, they



are entitled to request further information from you or require you to make written representations.

4. The higher Management will provide you with a written decision of the outcome of your review and any further steps which are available to you.

If your complaint has not been resolved by the higher Management your satisfaction, you may be entitled to take external adjudicative action depending on the nature of your Complaint.

11. RECORDS

The Complaints of the Customers, information related to the investigation thereof, documents specifying the investigation results, and the Feedback notices sent to the Customers shall be archived and stored in the Complaints register for at least three 3 years since the day the final Feedback notice was provided to the Customer.

12. EXTERNAL ADJUDICATION

Depending on the nature of the complaint, the country of origin, the payswix entity involved or several other factors, you may be able to approach an external adjudicator to review a decision made by payswix regarding the outcome of your complaint. Before approaching a potential adjudicator, please allow payswix to investigate and reply to your complaint first by following process outlined in this Complaints Policy. If there are external adjudicative options available to you, the Support Specialist will do their best to bring these to your attention but this does not exclude you from taking any steps yourself. Please be advised that there might be deadlines applicable to filing any action or specific conditions which apply to your complaint.

13. LEGAL ACTION

We would like to let you know that if you are not satisfied with the decision made by payswix, you shall have the right to use other legitimate remedies and to submit a complaint to the Bank of Lithuania, address: Totorių g. 4, LT-01121 Vilnius, prieziura@lb.lt, or Žalgirio g. 90, LT-09303, Vilnius.



In conjunction with provision above, if the Customer bringing the complaint is a Consumer, such Customer has a right to use out of court settlement of disputes and bring the complaint to the Bank of Lithuania. The complaint can be submitted to the Bank of Lithuania:

- via the electronic dispute settlement facility E- Government Gateway;
- by completing an application form (the form can be found here: <https://www.lb.lt/en/dbc-settle-a-dispute-with-a-financial-service-provider>) and sending it to Financial Market Supervision Service of the Bank of Lithuania, Žalgirio g. 90, LT-09303 Vilnius, prieziura@lb.lt;
- by filing out a free-form application and sending it to Financial Market Supervision Service of the Bank of Lithuania, Žalgirio g. 90, LT-09303 Vilnius, prieziura@lb.lt.

Such claim to the Bank of Lithuania must be submitted in accordance to the Law on the Bank of Lithuania of the Republic of Lithuania or the Law on the Protection of the Rights of Consumers of the Republic of Lithuania or Out of court settlement of disputes between consumers and financial market participants, procedures indicated in Bank of Lithuania guidelines, approved by the Bank of Lithuania Board of Directors, 26 January, 2012, Nr. 03-23, as amended from time to time.

If the dispute is not settled amicably or through other means of out-of-court settlement of disputes, the dispute shall be resolved in court according to the headquarters of payswix as provided by the procedure established by the laws.

