



# COMPLAIN POLICY

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## 1. INTRODUCTION

Here at PanPay 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 complaints seriously and strive to resolve them as quickly as possible. Below you can find the steps and actions we take once your complaint is received.

## 2. TERMS WE USE IN THIS POLICY

**Complainant** — the person making the complaint.

**Support Officer** — the employee assigned to your complaint.

**Head of Compliance** — the employee assigned to oversee the process of the complaints and may be requested to review your complaint.

**Complaint Policy** — this complaint policy which is available to our customers.

**Feedback notice** — a written confirmation of the outcome of your complaint we provide. EMI — electronic money institution.

## 3. WHEN TO QUERY AND WHEN TO COMPLAINT

Please feel free to submit query in case you have questions about our services, performance of the contract, need assistance about your account, transactions, or 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 PanPay, we sympathize with those who have become victims to fraudulent activities. It is one of our main concerns as a Financial institution. 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 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 consumer to safeguard your funds as well as select who you provide your personal information to. PanPay cannot be held responsible for loss of funds if you have become a victim of fraud.

## 5. WHAT TO INCLUDE IN A COMPLAINT?

1. Your full legal name or company name and (if applicable) your registered account information;

2. An email address from which to receive communication about your complaint;
3. A full description of your complaint.
4. Evidence, documents, correspondence, attachments, or any other information that could help us with the investigation of your complaint. If your complaint is incomplete or information is missing, details are too vague, PanPay will not be able to resolve your complaint and thus your complaint may be dismissed.

## 6. HOW TO CONTACT US

Please submit your complaint by writing an e-mail to [support@panpay.com](mailto:support@panpay.com). Please read section 5 carefully before submitting your complaint.

## 7. WHO MAY COMPLAIN?

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

- A PanPay customer;
- A former PanPay customer;
- A potential PanPay customer;
- The successor in title of a PanPay 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)

## 8. HOW THE COMPLAINT WILL BE HANDLED AT PANPAY

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 Officer** will be assigned to your complaint and will acknowledge the receipt of your complaint within 1 Business Day, via e mail to the e mail address provided in your complaint.
2. If **Support Officer** can resolve your complaint immediately, you will receive feedback 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.

4. Feedback will be provided and it will include following, when applicable:
  - a. Where your complaint was accepted and how your complaint was resolved ;
  - b. Where your complaint was rejected and the reasons for this decision;
  - c. Where you have requested specific action or redress, whether the action or redress is possible and/or available;
  - d. Possible further steps which may be available to you;

**Support Officers** are committed to reply with objectivity and decisions will be made on the basis of the facts. Should you feel that the decision 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. You must include written reasons for taking the matter for review again.
2. The review will be referred to the **Head of Compliance** for consideration. **The Head of Compliance** will acknowledge your request to review the matter within 3 Business Days, by email to the email address provided in your complaint.
3. **The Head of Compliance** 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 Head of Payments and Support** Departments 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 **Head of Payments and Support Departments** to your satisfaction, you may be entitled to take external adjudicative action depending on the nature of your complaint.

## 9. EXTERNAL ADJUDICATION

Depending on the nature of the complaint, the country of origin, the PanPay entity involved or several other factors, you may be able to approach an external adjudicator to review a decision made by PanPay regarding the outcome of your complaint. Before approaching a potential adjudicator, please allow PanPay 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 Officer 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.

## 10. LEGAL ACTION

We would like to let you know that if you wish to proceed with legal action against PanPay regarding the outcome of your complaint, you must do so within 1 year after the date on which the final decision is communicated to you by the **Head of Compliance** or within other terms according to the laws of the respective your account jurisdiction on the nature of the complaint.