

# The Internal Rules for the Receipt and Processing of Client Claims (Complaints)

## General Provisions

1. The purpose of the Internal Rules for the Receipt and Processing of Client Claims (Complaints) of Paysera LT, UAB (hereinafter referred to as the Rules) is to ensure the high quality of client support at Paysera LT, UAB (hereinafter referred to as the Company) by effectively processing client claims (complaints) and resolving related issues.
2. The Rules shall apply to all claims (complaints) received in relation to client support and shall cover the quality and control of claims (complaints) resolution.
3. Claims (complaints) regarding disputed transactions performed by the client shall be accepted, registered, and processed in accordance with these Rules.
4. The Client Support Department and other responsible employees of the Company involved in the processing and resolution of the claim (complaint) must be familiarised with and follow the Rules.
5. The terms used in the Rules shall have the following meanings:
  - 5.1. **Response** shall mean a written reply provided to the client addressing the raised issues and/or requirements.
  - 5.2. **Company** shall mean Paysera LT, UAB (legal entity code 300060819, VAT payer's code LT10001261114, registered office at Pilaitės pr. 16, Vilnius, the Republic of Lithuania).
  - 5.3. **Online Dispute Resolution Platform** – shall mean an electronic platform aimed at assisting consumers in resolving disputes arising from online contracts.
  - 5.4. **Client** shall mean a natural person or legal entity registered in the Company's system and having created an account.
  - 5.5. **Claim (complaint)** shall mean a written appeal submitted by the client to the Company stating that the rights or legitimate interests of a person have been violated in connection with the services provided by the Company or the concluded contracts and requesting that the client's claims be satisfied.
  - 5.6. **Claims (Complaints) Registration Log** shall mean a log where claims (complaints) received directly from clients by mail, email, or other electronic means are registered. This registration log shall be maintained electronically and published on the Company's Intranet.
  - 5.7. **Inquiry** shall mean an inquiry or request made by the client, either orally or in writing, in relation to the services or support provided by the Company, where the resolution of the inquiry or request is uncomplicated, and the answer can be provided immediately, or the matter can be resolved in the course of the contact with the client.
  - 5.8. **Consumer** shall mean a natural (private) person using the Company services for purposes unrelated to their business, trade, or professional activity.

## Registration of Client Inquiries and Claims (Complaints)

6. The client may submit an inquiry in writing (by sending an email to support@paysera.com or by mail to Pilaitės pr. 16, Vilnius), orally (by telephone), via the Online Dispute Resolution Platform, or in person at the Client Support Department at Pilaitės pr. 16, Vilnius.
7. All client inquiries received by the Company shall be processed in accordance with the Client Registration and Support Procedure.
8. Client inquiries made verbally (by phone or at the Client Support Department) shall be answered and the information they need shall be provided during the conversation. If an immediate answer and information cannot be provided for an oral inquiry, the employee of the Client Support Department shall ask the client to submit the inquiry in writing.
9. Upon receiving a written client inquiry, the employee of the Client Support Department must independently or with the assistance of employees from other departments organise and ensure the provision of a high-quality and comprehensive answer (information) to the client.
10. If a written inquiry meets the criteria of a claim (complaint), the employee of the Client Support Department helping the client shall mark it as a claim (complaint) in the Zammad system and, no later than the next business day, shall forward it to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto, who shall register the claim (complaint) in the Claims (Complaints) Registration Log.
11. Clients who believe that their rights or legitimate interests have been violated due to improper actions of the Company or its employees shall have the right to file a claim (complaint) with the Company in the following ways:
  - 11.1. By filling in a claim (complaint) and handing it over to the Client Support Department of the Company at Pilaitės pr. 16, Vilnius;
  - 11.2. By sending the claim (complaint) by mail to Pilaitės pr. 16, Vilnius;
  - 11.3. By sending an email to support@paysera.com. For the purpose of client identification, only claims (complaints) sent from the client's personal email specified in the client's account shall be accepted;
  - 11.4. On the Company's website www.paysera.lt by filling in the inquiry form published in the "Send us a message" section;
  - 11.5. Via the Online Dispute Resolution Platform at <https://webgate.ec.europa.eu/odr>.
12. A claim (complaint) may be submitted by an authorised representative of the client (e.g. an attorney representing the client). In this case, the authorised person must provide documents confirming their authority to act on behalf of the client (e.g. a power of attorney or other representation agreement). The document authorising the person to act on behalf of the client shall be copied, certified by the responsible employee (with a stamp indicating "Certified Copy" and the name, surname, position, signature, and date of the person who made and verified the copy against the original), and attached to the claim (complaint). If a claim (complaint) submitted by the client's authorised representative does not include documents confirming the representative's authority, the responsible employee processing the claim (complaint) must request that such documents be provided.
13. The claim (complaint) must specify:
  - 13.1. Full name (for a natural person) of the client/Name of the client (for a legal entity);
  - 13.2. Address of the Client;
  - 13.3. Phone number or email address;
  - 13.4. The date of submission of the claim (complaint);
  - 13.5. The essence of the claim (complaint), i.e. which of the client's rights or legitimate interests have been violated;
  - 13.6. The demands made to the Company;

13.7. Documents related to the claim (complaint), if the client has any.

14. If at least one of the mandatory items of information specified in clause 13 of the Rules is not provided, the Company shall have the right to request the client to clarify (supplement) the claim (complaint).

15. The written claim (complaint) submitted by the client must be written in a neat and legible manner and signed by the client or a person authorised by the client.

16. Oral client claims (complaints) shall be responded to during the conversation, and the client shall be informed that written responses are provided only to written claims (complaints) received.

17. All Client claims (complaints) submitted at the Client Support Department at Pilaitės pr. 16, Vilnius, or sent by mail to Pilaitės pr. 16, Vilnius, must be scanned and forwarded by email no later than the next business day after their receipt to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto, who shall register the claim (complaint) in the Claims (Complaints) Registration Log.

18. Client claims (complaints) received by email at support@paysera.com shall be, no later than the next business day after their receipt, assigned in the Zammad system to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto, who shall register the claim (complaint) in the Claims (Complaints) Registration Log.

19. Client claims (complaints) submitted at the Client Support Department of the Company and responses to such claims (complaints) shall be filed in a separate folder named "Client Complaints".

## Processing of Claims (Complaints)

20. Claims (complaints) submitted by clients shall be investigated and the Company's responses thereto shall be prepared and signed by the employee appointed by the Head of the Client Support Department as responsible for the processing of claims (complaints) and the preparation of responses thereto.

21. In exceptional cases, when a claim (complaint) submitted by the client is extensive and/or complex in nature, the claim (complaint) shall be investigated and the response shall be prepared by an employee of the Legal Department, in coordination with the Head of the Legal Department, together with the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto.

22. If a claim (complaint) submitted by the client is related to improper actions of a Company employee, the respective Company employee and their immediate superior must be informed of the decision taken.

23. If an inquiry or claim (complaint) was submitted by email to support@paysera.com:

23.1. The response to a claim (complaint) received by email shall be sent to the client from the email address support@paysera.com. The response of the Company shall be sent by the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto.

23.2. All inquiries received by email at support@paysera.com shall be responded to by the employees of the Client Support Department, either independently or with the assistance of other Company employees.

24. In all cases, the Company's response to a claim (complaint) sent from the email address support@paysera.com must be coordinated with the Head of the Client Support Department or the head of a division of this department.

25. A claim (complaint) shall be considered resolved when all problem-solving actions have been taken, decisions have been made, and a response has been provided to the client.

26. After investigating a claim (complaint), the Company shall make a decision to recognise the claim (complaint) submitted by the client as:

26.1. Satisfied – the Company acknowledges that the client's demands are legitimate and justified, and takes actions to fulfil them;

26.2. Partially satisfied – the Company partially satisfies the client's demands;

26.3. Not satisfied – the client's demands are unjustified and therefore not met.

27. If the client submitted a claim (complaint) via the Online Dispute Resolution Platform:

27.1. No later than within 30 days from the date of receipt of the claim (complaint) in the Online Dispute Resolution Platform, the employee of the Client Support Department must log into the Online Dispute Resolution Platform and, if no agreement is reached with the client, propose the Bank of Lithuania as the dispute resolution body;

27.2. If the client agrees that the claim (complaint) will be investigated by the Bank of Lithuania, the Online Dispute Resolution Platform shall automatically forward the claim (complaint) to the Bank of Lithuania;

27.3. The dispute resolution body shall provide a decision within 90 days;

27.4. If the client and the Company do not agree on a dispute resolution body within 30 days, the claim (complaint) shall be considered inactive.

28. If the Company decides to refuse to satisfy or to partially satisfy the claim (complaint) submitted by the client, the written response of the Company to the client must meet the following requirements:

28.1. The Company's decision to refuse to satisfy the claim (complaint) (or to partially satisfy the claim (complaint)) must be reasoned, supported by documents (these documents (their copies) must be attached to the Company's response), provisions of the General Payment Services Agreement, or legislation. If the claim (complaint) submitted by the client disputes a payment transaction that could have been executed by fraudsters and/or due to fraudulent actions, the Company, when investigating the claim (complaint), shall seek to clarify all circumstances related to the execution of the disputed payment transaction and associated with it, which would help the Company to properly and reasonably assess both the circumstance of the authentication procedure for the disputed payment transaction and the circumstance of the client's intent to perform the respective payment transaction;

28.2. The written response of the Company must provide information about the measures for protecting the client's interests, including but not limited to possible dispute resolution measures and rights. In cases where the client is a consumer, the written response provided to them must state that the Company's decision to refuse to satisfy or to partially satisfy the claim (complaint) submitted by the client may be appealed to the Bank of Lithuania within one year from the date of submission of the claim (complaint) to the Company, in accordance with the Rules for the Out-of-Court Procedure of Settlement of the Disputes Between Consumers and Financial Market Participants in the Bank of Lithuania approved by resolution No. 03-23 of the Board of the Bank of Lithuania of January 26, 2012 On the Approval of the Rules for the Out-of-Court Procedure of Settlement of the Disputes Between Consumers and Financial Market Participants in the Bank of Lithuania.

29. If the claim (complaint) submitted by the client is found to be justified (whether satisfied or partially satisfied) and the financial service may have been improperly provided in a way that violated the Client's legitimate expectations and/or interests, the Company's response to the client shall express the Company's regret for the improper provision of the financial service and include the apology to the client.

30. The Company's response regarding the decision to refuse to satisfy or to partially satisfy the claim (complaint) submitted by the client shall explain to the client the reasons for the Company's decision as clearly and comprehensibly as possible, and additional measures may be proposed to increase the client's satisfaction with the Company's services.

## Letters from Competent Authorities Regarding Dispute Resolution with Clients

31. Letters from competent authorities regarding dispute resolution with clients shall be registered in accordance with the established procedure for handling of incoming documents in the Registry of incoming documents on the internal electronic document management system. Letters from competent authorities shall be registered by the Company's administrator.

32. After registering a letter from a competent authority regarding a dispute with a client, the Company's administrator shall forward it or send it by email to the Head of the Client Support Department or the head of the respective division of this Department, who shall immediately forward the letter or send it by email to the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto.

33. Upon receiving a Client's claim (complaint) forwarded by the Bank of Lithuania or a request from the Bank of Lithuania to provide explanations regarding a dispute being investigated at the Bank of Lithuania:

33.1. The employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto must create a separate task in the Company's task management system Jira and store all information related to the progress and date of providing a response to the client and the Bank of Lithuania;

33.2. The Company's response to the client and/or the Bank of Lithuania must be coordinated with the Legal Department.

### Deadlines for Providing Responses to Claims (Complaints)

34. Upon receiving a claim (complaint) disputing the recognition of a payment transaction as properly authorised, the Company must commence its investigation without delay, no later than by the end of the next business day after receiving the claim (complaint).

35. Upon receiving a client's claim (complaint), the client shall be informed that their claim (complaint) has been received and registered in the Company's Claims (Complaints) Registration Log no later than within 1 (one) business day.

36. If the client is a consumer, the Company's response to the client's claim (complaint) must be provided no later than within 15 business days from the date of receipt of the written claim (complaint). In case it is impossible to provide a response within 15 business days due to reasons beyond the Company's control, a provisional response must be provided to the client, indicating the reason for the delay and the time by which the final response will be provided. The deadline for providing the final response cannot exceed 35 business days from the date of receipt of the written claim (complaint).

37. If the client is not a consumer, the Company's response to the client's claim (complaint) must be provided no later than within 30 calendar days from the date of receipt of the claim (complaint).

38. After providing the Company's response to the client's claim (complaint), the Head of the Client Support Department or the head of the respective division of this Department, or the employee appointed in accordance with clause 20 of the Rules for the processing of claims (complaints) and the preparation of the answers thereto, shall fill out the Claims (complaints) Registration Log, indicate the date of the Company's response, and a brief comment on the resolved client's claim (complaint).

39. Responses to letters from competent authorities regarding disputes with clients shall be provided within 30 calendar days from the date of their receipt by the Company, unless these letters specify a different deadline for providing the response.

### Storage of Claims (Complaints) and Responses to Claims (Complaints)

40. Claims (complaints) submitted by the client and responses to those claims (complaints) are stored in the Zammad system. Information about the claims (complaints) submitted by the client with a reference to the Zammad system is also recorded in the client's account in the system.

41. Claims (complaints) received from competent authorities and the Company's responses to these claims (complaints) shall be registered in accordance with the Company's procedure for registering incoming and outgoing letters and stored in the internal electronic document management system.

42. If the Company decides to recognise a claim (complaint) submitted by the client as satisfied or partially satisfied, or receives comments from competent authorities regarding the non-compliance of the services provided with legislation or documents of competent authorities, it shall take measures to eliminate the identified non-compliances and prevent the causes of similar claims (complaints) from arising.

43. These Rules shall be approved and amended by the order of the CEO of the Company.

44. These Rules shall be reviewed and, if necessary, amended at least once every two years or more frequently, for example, in case of changes in legal requirements or other significant events.

45. The Head of the Client Support Department shall be responsible for submitting proposals regarding amendments to the Rules to the CEO of the Company or the Legal Department.

The Internal Rules for the Receipt and Processing of Client Claims (Complaints) (valid until 18.03.2022)

The Internal Rules for the Receipt and Processing of Client Claims (Complaints) (valid until 26.08.2024)