

UAB “International Payment Union”

Complaint Handling Procedure

I. GENERAL PROVISIONS

1. This complaint handling procedure (hereinafter referred to as the **Procedure**) of UAB International Payment Union, (hereinafter referred to as the **Company**) establishes the procedure for handling complaints lodged against the Company, storage of complaints and related material in order to ensure an expeditious and proper process of handling the complaints received, continuous assessment of the outcomes of complaints, and efficient elimination of causes for complaints.
2. The requirements set in the Procedure are applicable regarding receiving, registering, dealing with and deciding on complaints related to the services provided as Agent of a licensed electronic money institution, and / or contracts with customers.
3. To us, a complaint presents an opportunity to turn an unhappy customer into a satisfied, long-term client. A dissatisfied customer who finds their issues dealt with swiftly and professionally will frequently have more respect for the firm than where their experience is smooth and untroubled.
4. The Procedure shall disclose appropriate management controls and ensure that the Company shall take reasonable steps to:
 - 4.1. ensure the organisation of the process of managing applicants' complaints quickly, fairly, efficiently and properly;
 - 4.2. adhere to the deadlines for dealing with complaints;
 - 4.3. process the personal data and other information provided by the applicant in accordance with the requirements established by legal acts;
 - 4.4. avoid any conflicts of interest, take all necessary measures to identify and eliminate conflicts of interest;
 - 4.5. entrust the handling of applicants' complaints to employees who have sufficient skills, knowledge and experience to perform this function, give them access to all the information needed to deal with complaints;
 - 4.6. accept all complaints submitted to the Company by applicants (including, but not limited to, through an authorized third party);
 - 4.7. keep proper and organized records of the complaints received and information on the measures taken to resolve the complaint;
 - 4.8. monitor the effectiveness of the complaints management processes and update them when necessary;
 - 4.9. establish, maintain and operate an internal information system to ensure an effective complaints management process.
5. Terms used in the Procedure:
 - 5.1. **Applicant** – a person, who has lodged a complaint against services provided by the Company and/or contracts concluded with the Company.
 - 5.2. **Complaint** – a written application submitted to the Company by the Applicant stating that the rights or legitimate interests of a person arising from or related to the services provided by the Company or concluded agreements have been violated.
 - 5.3. **Person handling the complaint** – a person who is responsible for handling complaints: collecting information required for complaints, handling complaints, making decisions and submitting responses to the applicants.
 - 5.4. **Complaint register** – an electronic register of complaints filed, in which the Company registers complaints received by entering the information specified in Paragraph 16 of the Procedure.
 - 5.5. **Consumer** – a natural person, meeting personal (not related to his/her business or professional activities), family, or household needs whereof the services or contracts of the Company, against which the complaint is lodged, are meant for.

II. LODGING AND ACCEPTING COMPLAINTS

6. Complaints shall be submitted in writing by filing a complaint electronically, by mail, or upon delivery to the Company's registered office.
7. The complaint must contain the following information:
Name and surname of the Applicants – natural persons, name of legal persons;
 - 7.1. If the Applicant is represented by another person – name and surname of the representative and the basis of representation;
 - 7.2. Date of Complaint submission;
 - 7.3. Address of the Applicant;
 - 7.4. Contact data of the Applicant: phone number, email address;
 - 7.5. The essence of the Complaint – actions (inactions) of the Company, which the Complaint is lodged against, related to the Company's activities and/or provision of services, as well as the arguments and reasons, on which the Applicant substantiates his/her claims;
 - 7.6. Requirements of the Applicant;
 - 7.7. List of documents enclosed together with the Complaint;
 - 7.8. Signature of the Applicant or his/her representative.
8. The Applicant must enclose with the complaint all documents confirming his/her arguments and claims. If the Complaint is lodged by the representative of the Applicant, the Complaint must be accompanied by a valid authorization or other document certifying the right of the representative's powers to lodge a Complaint and receive a response from the Company.
9. Complaints may be lodged in Lithuanian or English languages.
10. The submitted Complaint shall be assessed if its compliant with the requirements set out in Paragraphs 7, 8 and 9 of the Procedure. If the Complaint meets the requirements, it shall be accepted and notified that the Complaint has been accepted, specifying the deadline for handling the Complaint and informing that the Complaint handling process is free of charge is sent to the Applicant on the next business day at the latest.
11. If the Complaint does not comply with the requirements indicated in Paragraphs 7, 8 and 9 of the Procedure, the Applicant shall be notified not later than within 3 business days by sending a notice indicating the deficiencies of the Complaint and proposing to eliminate them.
12. Anonymous Complaints are not accepted.

III. REGISTERING COMPLAINTS

13. The employee of the Company who has accepted the Complaint shall register the Complaint in the Complaint register with a respective reference number.
14. When registering a Complaint, the details listed in Paragraph 16 of the Procedure shall be entered and an electronic version of the Complaint shall be enclosed (if the Complaint is lodged by mail or delivered to the Company's head office, the Complaint including all the annexes thereto shall be scanned).
15. After the Complaint has been registered, the employee shall not later than on the next business day refer the Complaint including all annexes thereto to the Person handling the complaint.
16. The following data shall be entered into the Complaint register:
 - 16.1. Applicant's full name (for natural persons) or name (for legal entities);
 - 16.2. Applicant's address specified in the Complaint and other contact details;
 - 16.3. date of the Complaint receipt and its receipt method;
 - 16.4. Complaint category, which shall include, but are not limited to: a. Service quality; b. Fees and charges; c. Transaction errors; d. Customer service; e. Product features; f. Marketing and sales practices; g. Data protection and privacy.
 - 16.5. essence of the Complaint (brief contents);
 - 16.6. Company's services for which the Complaint is lodged against, their types;
 - 16.7. date of sending a reply to the Applicant;
 - 16.8. final Complaint handling outcome (decision);
 - 16.9. name and position of the employee of the Company who examined the Complaint and provided a response to the Applicant;

- 16.10. additional important information, if any.
17. The Company collects and, at the request of the Bank of Lithuania, must provide information on the number of received Complaints, broken down by the reasons for submission and the results of the examination (received complaints, examined complaints, satisfied complaints, partially satisfied complaints).
18. The Applicant must be answered in all cases in written by sending a response by post, e-mail or other durable medium if agreed between the Applicant and the Company.
19. Examined Complaints including all documentation shall be stored in a separate file and/or in the Company's electronic data storage system in accordance with the procedure established by law, but not less than 3 years from the date of submission of final reply to the Applicant.

IV. COMPLAINT HANDLING AND DECISION MAKING

20. The Company shall seek to handle Complaints as promptly and comprehensively as possible. The Company shall handle Complaints in accordance with the principles of respect for human rights, justice, good faith, reasonableness, objectivity, impartiality, operation, and other principles established in the legal acts of the Republic of Lithuania applicable to the Company.
21. The Person handling the complaint shall handle the Complaint himself/herself and draw up a reply to the Applicant within the shortest possible time, but not later than within the time limits specified in Paragraph 25 of the Procedure.
22. If the Complaint is lodged regarding the actions (inactions) of the Person handling the complaint or the actions (inactions) of his/her close relatives (if such are employed in the Company), the Person handling the complaint shall notify the General Manager of the Company of the same and disengage himself/herself from handling such complaint. In such a case, the General Manager of the Company shall appoint another competent person, who shall handle the Complaint, make a decision, and submit a reply to the Applicant. A person, whose actions (inactions) are reported against, a close relative of such person, or a person directly subordinate to such person may not be appointed to handle the Complaint. In the event of any other circumstances that cause a conflict of interest, the Person handling the complaint must immediately inform the General Manager of the Company and disengage himself/herself from handling a particular Complaint.
23. The Person handling the complaint shall collect and evaluate all documents and data related to the Complaint in question, which have been submitted by the Applicant and which the Company may legitimately collect on its own initiative.
24. If necessary, the Person handling the complaint shall have the right to request the Applicant to provide additional information and/or documents, which may affect proper handling of the Complaint, within a specified time limit, which may not be less than 5 calendar days.
25. The Complaint shall be examined, and a response shall be submitted to the Applicant no later than within 15 working days from the day of receipt of the Complaint. If the Complaint cannot be examined within the period specified in this paragraph, the Person handling the complaint must inform the Applicant, indicate the circumstances of the delay in replying and the deadline (which may be extended to 35 working days) by which the Complaint will be examined, and an answer shall be submitted to the Applicant.
26. The Person handling the complaint shall prepare a response in the light of the circumstances identified during the Complaint handling process and, if applicable, take one of the following decisions:
- 26.1. to dismiss the Complaint;
 - 26.2. to partially satisfy the requirements declared in the Complaint;
 - 26.3. to fully satisfy the requirements declared in the Complaint.
27. If, during the Complaint handling process, the Applicant, who has lodged the Complaint, waives his/her claim in writing, the Person handling the complaint shall terminate the Complaint examination. In such a case, a respective entry of the waive of Complaint and termination of Complaint examination process shall be made in the Complaint register.
28. When the Applicant is provided with the decision specified in clauses 26.1 and 26.2 of the Procedure, the Applicant shall be informed of the reasons for refusing to satisfy the Complaint, other means of protection of the Applicant's interests shall be indicated, including but not limited to Chapter VI of this Procedure.

29. The Applicant must be answered in all cases in written by sending a response by post, e-mail or other durable medium if agreed between the Applicant and the Company.
30. Examined Complaints including all documentation shall be stored in a separate file and/or in the Company's electronic data storage system in accordance with the procedure established by law, but not less than 3 years from the date of submission of final reply to the Applicant.
31. Complaints flow chart is provided in Annex No. 1 of this Procedure.

V. CONTROLLING THE COMPLAINT MANAGEMENT PROCESS

32. The Operation Manager shall perform the control of Complaint management process, monitor and ensure that the Company's Complaint management process is efficient and prompt, and provides his/hers remarks on claim handling process improvement.
33. The Operation Manager shall give suggestions for the amendments and/or supplements to the Complaint handling procedure.
34. In order to ensure a smooth Complaint handling process, the Operation Manager shall:
 - 34.1. collect and analyze the information on similar complaints to determine the root causes of such complaints and determine the priorities of the causes elimination;
 - 34.2. assess whether the root causes of complaints may be eliminated and make suggestions to the General Manager of the Company with respect to addressing the causes of complaints;
 - 34.3. assesses whether the underlying cause of certain Complaints may lead to Complaints about other services of the Company;
 - 34.4. provide for an action plan to address the root causes of complaints;
 - 34.5. analyze the disturbances in the complaint handling process and make suggestions for the improvement of this process;
 - 34.6. ensures that information on recurring or systemic reasons for Complaints is provided to the General Manager of the Company on a regular basis;
 - 34.7. advise the persons handling the Complaints on uncertainties and issues arising during the Complaint handling process.
35. Having assessed the suggestions made by the Operation Manager or the improvement of Complaint handling process, remedial actions, and elimination of Complaints sources, the General Manager of the Company shall make decisions on the amendments of Complaint handling process and approve the course of actions for the elimination of Complaints sources.
36. The Operations Manager shall conduct monthly quality checks on a sample of complaints handled to ensure compliance with this procedure and regulatory requirements. Quality checks shall assess Timeliness of responses; Completeness and clarity of responses; Appropriateness of resolutions; Accuracy of complaint register entries.
37. The Operation Manager shall prepare and submit a quarterly report to the Company's management detailing:
 - 37.1. The number and nature of complaints received;
 - 37.2. The average time taken to resolve complaints;
 - 37.3. The outcomes of complaints;
 - 37.4. Any identified trends or systemic issues;
 - 37.5. Results of the quality checks;
 - 37.6. Recommendations for process improvements or staff training based on complaint data.
38. Information on the Complaint management process specified in Paragraph 39 of the Procedure, shall be published by the Company on its website at the address: www.interpaylink.com_
39. The information provided on the Company's website shall be clear, accurate, relevant and shall include:
 - 39.1. the information that the Applicant must indicate in the Complaint (Paragraph 5 of the Procedure);
 - 39.2. contact details for submitting the Complaint;
 - 39.3. the term within which the Company examines the Complaint;
 - 39.4. information on the Applicant's possibility to apply with the Complaint to the competent Complaints review institution (Paragraphs 40 – 43 of the Procedure).

VI. COMPLAINT HANDLING AT OTHER COMPETENT COMPLAINT HANDLING INSTITUTIONS

40. If the Applicant is considered to be a Consumer and believes that his/her Complaint has not been addressed properly, he/she shall have the right to apply to the Bank of Lithuania within 1 year. A Complaint may be lodged to the Bank of Lithuania:

- 40.1. through an online dispute settlement platform using the E-Government Gateway;
- 40.2. by filling in the Consumer Application Form and sending it to the Financial market supervision service of the Bank of Lithuania at Žalgirio g. 90, LT-09303, Vilnius, E-mail frpt@lb.lt;
- 40.3. by submitting a Free Form Application and sending it to the Financial market supervision service of the Bank of Lithuania at Žalgirio g. 90, LT-09303, Vilnius Vilnius, E-mail frpt@lb.lt.

41. More information on the procedure for applying to the Bank of Lithuania can be found on: <https://www.lb.lt/en/dbc-settle-a-dispute-with-a-financial-service-provider#ex-1-4>

42. Before contacting the Bank of Lithuania the Applicant must first address the Company not later than within 3 months from the day the Applicant became aware or ought to have become aware about violation of his/her rights or lawful interests.

43. If the Applicant believes that the Company has violated its rights or legitimate interests in relation to the financial services provided by the Company and/or contracts concluded with the Company, the Applicant may submit a complaint to the Bank of Lithuania, as a supervisory authority. A complaint may be lodged to the Bank of Lithuania:

- 43.1. by posting a written complaint to the mailbox of the Bank of Lithuania at Totorių g. 4 on business days from 7:00 A.M. to 6:00 P.M.;
- 43.2. by mailing to Totorių g. 4, LT-01121 Vilnius;
- 43.3. by emailing to info@lb.lt or pt@lb.lt;
- 43.4. by faxing to (8 5) 268 0038;
- 43.5. by lodging a written complaint at the Bank of Lithuania;
- 43.6. by filling in the electronic link on the website of the Bank of Lithuania.

44. Any Applicant, who believes that his/her complaint has not been dealt with properly, shall have the right to apply to the court of the Republic of Lithuania in the manner prescribed by legal acts of the Republic of Lithuania.

45. If the Applicant is considered to be a Consumer, he/she shall have the right to use an Online Dispute Resolution platform (ec.europa.eu/consumers/odr) that is provided by the European Commission.

VII. FINAL PROVISIONS

46. This Procedure shall come into force from the moment of its approval, and it may be amended by the decision of the General Manager of the Company. Amendments and/or supplements to the Procedure shall enter into force on the next day following their adoption. The General Manager of the Company must ensure that the Company's employees are informed in a timely manner of any amendments and/or supplements to the Procedure.

47. The General Manager of the Company is responsible for the implementation of the Procedure, periodic inspection, and evaluation of the effectiveness of the Procedure and takes appropriate measures to correct the deficiencies found.

48. The General Manager of the Company is responsible for proper implementation of the Procedure.

Annex No. 1: Complaints flow chart

