Complaint handling policy



1. Introduction

1.1. Unlimit EU Ltd (the "Company") is a limited liability company registered in Cyprus (HE328641) and is an Electronic Money Institution licensed and regulated by the Central Bank of Cyprus (License No. 115.1.3.7/2018), authorized to offer e-money and payment services (the "Services").

2. Our principles on 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 the provision of Services will not arise from time to time. If you are not satisfied with our Services and/or related products, 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. Definition

- 3.1. The Company considers as a complaint a statement of dissatisfaction addressed to the Company, by a natural or legal person relating to the provision of the Services.
- 3.2. The Company considers as a Complainant a natural or legal person who is presumed to be eligible to have a complaint and who has already lodged such complaint by following the official procedure as described in section 4 of this Complaint Handling Policy (the "Policy").

4. Submitting a complaint

- 4.1. We recommend that you contact your Relationship Manager/Account Manager directly prior filing a complaint as several issues can be resolved easily and swiftly through this process.
- 4.2. The Company aims to resolve any issue received within 15 business days in cooperation with relevant departments.
- 4.3. If you receive a response from the Company, but believe your issue/case is unresolved, you can submit a <u>formal complaint</u> (the "Complaint or "Complaints") by completing the Complaint Form available on the Company's website. Please download the form here.
- 4.4. The Complaint can be submitted in two ways:
 - <u>Electronically, via email:</u>

By sending the Complaint Form and documents to the email address: complaints@unlimit.com

In hard copy via post/courier/personal delivery:

By transmitting the Complaint Form and documents to the below address:

Compliance Department Unlimit EU Ltd 125 Georgiou Griva Digeni, Limassol 3101, Cyprus

5. Requirements for Complaints' submission

- 5.1. A Complaint will be considered received by the Company if same has been received in writing and includes all the details specified in the Complaint Form.
- 5.2. All complaints must include:
 - Full name.
 - Address (Residential).
 - Contact details (telephone number and email).
 - Payment account number and/or Card Account and Card number (last four digits).



- 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.).
- 5.3. Any Complaint must be submitted in writing and in English language , in a clear and comprehensible manner. No oral Complaints will be accepted.
- 5.4. 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. 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 initial Complaint Form.
- 5.5. 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 other damage.

6. Complaint handling process

Acknowledgement

- 6.1. After receipt of your Complaint submitted in accordance with the requirements described above, you shall receive a written acknowledgement (via email or post) by the Company 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.
- 6.2. 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 Complaint Handling Policy, internal regulations of the Company and applicable legislation.
- 6.3. 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, the complaint cannot be addressed by the Company. Where possible, the Company will endeavor to provide you with additional detail such as information regarding the appropriate business or entity to whom the complaint might be addressed.

Investigation

- 6.4. 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.
- 6.5. 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 international industry practices.

Resolving and Final Response to Complaints

- 6.6. Upon completion of the investigation, you will be informed of the proposed solutions/answers.
- 6.7. We shall make every effort to respond to the Complaint within fifteen (15) business days of receipt of the complaint.
- 6.8. In the event that your Complaint is more complex and requires further investigation and we cannot resolve it within fifteen (15) business days, we will send you a holding response in writing (via email or post) indicating the reasons for the delay and specifying the deadline that you will receive the final response. In such a case we will keep you updated on the handling process.
- 6.9. The final response will not exceed thirty-five (35) business days from the date of the initial receipt of your Complaint.
- 6.10. 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.
- 6.11. When the Company has reached to an outcome, you will be informed accordingly together with an explanation of the Company's position and any remedial measures the Company intends to take (if applicable).
- 6.12. In case you have received the Company's final response but you are not satisfied with it, you may submit your Complaint to the Financial Ombudsman of the Republic of Cyprus. The Complaint is submitted to the Financial Ombudsman of the Republic of Cyprus within the following timeframes:
 - 6.12.1. 12 months from the date on which you submitted a complaint to the Company,
 - 6.12.2. 18 months from the date on which you became aware or should reasonably have become aware of the difference.



- 6.13. In case you have not received the Company's 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 of the Republic of Cyprus within the timeframes mentioned in section 6.12.
- 6.14. 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

Address: 15 Kypranoros, 1061 Nicosia Postal Address: P.O. Box 26722, 1647 Nicosia Email: complaints@financialombudsman.gov.cy

Tel. +357 22 84 89 00

Fax. +357 22 66 05 84 or +357 22 66 01 18

6.15. You may also submit your Complaint with the Central Bank of Cyprus.

Central Bank of Cyprus

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

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