



AlphaPay UAB,

Įmonės kodas 305249880, registruota adresu Ulonų g. 2, LT-08245 Vilnius, Lithuania

Company code 305249880, registered address at Ulonų str. 2, LT-08245 Vilnius, Lithuania

ALPHAPAY UAB COMPLAINTS MANAGEMENT RULES (PROCEDURE)

I. GENERAL PROVISIONS

I.I. These Complaints Management Rules (hereinafter referred to as the Rules) establish the rules and procedures to be followed by AlphaPay UAB (hereinafter referred to as the Company) when investigating complaints from customers or potential customers (hereinafter referred to as the Applicant) regarding services provided by the Company and / or concluded contracts (hereinafter "the Complaint").

I.II. These Rules have been prepared in accordance with the European and Lithuanian law.

II. REQUIREMENTS APPLICABLE TO COMPLAINTS, PROCEDURE FOR SUBMITTING COMPLAINTS

II.I. If the Applicant considers that the Company has violated the rights and / or interests of the Applicant protected by the laws related to the provision of services and / or concluded agreements, the Applicant may apply to the Company and submit a written Complaint. In case the Applicant is a Consumer Applicant, such Complaint may be submitted to the Company within 3 months from the day when the Applicant became aware or should have become aware of the violation of the Applicant's rights and / or interests protected by law.

II.II. The complaint contains information:

II.II.I. Applicant's personal data: name / surname / company name, legal entity code (for legal entities only), place of residence / registered office address, telephone number and e-mail address.

II.II.II. Date of complaint.

II.II.III. Circumstances Involving the Applicant's Complaint and the Applicant's Claim.



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II.II.IV. The complaint must be signed by the Applicant or his authorized representative in secure and verified way (i. e. secure electronic signature).

II.III. The Applicant is responsible for the accuracy (i.e. correctness) of the personal and contact details provided in the Complaint and agrees that the Company will provide all information related to the Complaints Process using the contact details provided in the Complaint. For the sake of clarity, if the Applicant provides its e-mail address, the Company has the right to provide information and continue to communicate by e-mail.

II.IV. The complaint must be submitted in person by the Applicant himself or his authorized representative. The Applicant's representative must submit together with the submitted Complaint documents proving his / her identity and powers: a copy of the authorized identity document / passport and a power of attorney confirming the right to represent the Applicant or any other document confirming permission to act on behalf of the Applicant. The Complaint submitted by the Applicant or the Applicant's representative must contain all the information specified in Clause II.II.

II.V. The complaint can be submitted:

II.V.I. By registered mail to: Ulonų str. 2, LT-08245 Vilnius, Lithuania;

II.V.II. By sending email to cco@nova-pay.eu

III. EXAMINATION OF THE COMPLAINT AND DECISION-MAKING

III.I. The Company shall ensure that the Complaints Process is handled by staff with the skills, knowledge and experience required to perform this function. The Company provides employees with all information necessary for the Complaints Investigation process.

III.II. In examining the Complaint, the Company's employees adhere to the following principles: respect for human rights, fairness, integrity, reasonableness, objectivity, impartiality and efficiency.

III.III. All Complaints received in accordance with the procedure established in these Rules shall be registered in the Company's Complaints Registration Journal.

III.IV. The following data shall be recorded in the Complaints Journal:

III.IV.I. Personal data of the applicants: name / surname / company name, place of residence / registered address indicated in the complaint, telephone number and e-mail address.



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III.IV.II. If the Complaint is submitted by the Applicant's representative, the following data must be recorded in the Complaints Registration Journal: the name and surname of the representative, the basis of the representative's power of attorney.

III.IV.III. Date and method of receipt of the complaint.

III.IV.IV. Brief description of the complaint.

III.IV.V. Company services or actions that are the subject of the complaint.

III.IV.VI. Date of the Company's response to the Applicant.

III.IV.VII. The final outcome of the complaint process (i.e., the Company's decision).

III.IV.VIII. Additional information that, in the Company's opinion, must be recorded in the Complaints Registration Journal.

III.V. The Company shall not deal with Complaints that do not comply with the requirements set forth in Paragraph II of these Rules, which are written in a language other than Lithuanian or English, which are irregular and illegible, or which do not clearly indicate the identity of the Applicant.

III.VI. In case the submitted Complaint lacks the information necessary for the examination of the Complaint, the Company has the right to ask the Applicant to eliminate the deficiencies of the Complaint: to indicate the essence of the Complaint or to provide additional documents or data necessary for the examination of the Complaint. In this case, the Company shall set a reasonable time limit, which may not be shorter than 7 calendar days, in order to eliminate the deficiencies of the Complaint.

III.VII. If the submitted Complaint does not comply with the requirements of these Rules or the Applicant or its representative does not eliminate the deficiencies of the Complaint within the established term, the Company shall not examine such Complaint and return it to the Applicant or its representative. Such circumstances shall not prevent the Applicant from re-applying to the Company for the Complaint after the deficiencies of the Complaint have been remedied.

III.VIII. The Company may refuse to consider a Complaint if:

III.VIII.I. The Complaint does not comply with the requirements set forth in Paragraphs II and III of these Rules or the deficiencies of the Complaint have not been remedied within the set time limit, therefore the examination of the Complaint is impossible (i. e. the identity of the Applicant is not specified).



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III.VIII.II. The complaint was made about activities for which the Company is not responsible (for example, the actions complained of were performed by another service provider).

III.IX. A decision of the Company or a court decision, decision or ruling was made with respect to the same object and on the same grounds as the Complaint.

IV. SUBMISSION OF THE REPLY TO THE APPLICANT

IV.I. The Complaint shall be examined and a response shall be provided as soon as possible, but not later than within:

(i) 12 calendar days from the date of receipt of the Complaint from the individual Applicant - the Consumer; and

(ii) 35 calendar days from the receipt of the Complaint from other Applicants who are not considered as the Consumers (i. e. corporate clients).

The term starts to run from the date of receipt of the Complaint. In exceptional cases, when the Complaint cannot be examined within the term specified in this provision, the Company must inform the Applicant thereof and indicate the circumstances and the new term within which the Complaint will be examined and a response submitted.

IV.II. The Company is investigating the Complaint in accordance with the applicable laws and makes one of the following decisions:

IV.II.I. The applicant 's claim is approved (accepted).


IV.II.II. The applicant 's claim is accepted in part.

IV.II.III. Dismiss the complaint.

IV.III. When the Complaint is rejected or only partially satisfied, the Company shall indicate in its reply to the Applicant the reasons why the Complaint has been rejected or why the Claims have been satisfied only in part, and indicate other means available to the Applicant to defend its interests, including but not limited to measures and courts.

IV.IV. The Company's decision on the Complaint shall be entered in the Complaints Registration Journal and sent to the Applicant by registered mail or e-mail to the addresses specified by the Applicant.

V. FINAL PROVISIONS

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V.I. The Applicant, who is not satisfied with the decision of the Company, has the right to apply to the other institutions. Since, AlphaPay UAB is licensed Payment institution which is regulated by the Bank of Lithuania (official website <https://www.lb.lt/>), Applicant has the right to apply for a possible Complaint to the Bank of Lithuania through the following contacts:

- a) Via mail - Totorių str. 4, LT-01121 Vilnius, Lithuania;
- b) Via email – info@lb.lt;

V.II. The Company shall keep the Complaints, the data related to the Complaints Review, the documents providing the specific results of the Complaints Review and the answers provided to the Applicants for at least 3 years from the date of submission of the final reply to the Applicant. All information and documents are stored in accordance with Lithuanian law. For more information please read AlphaPay UAB Privacy Policy - <https://nova-pay.eu/uploads/static/files/en/04-privacy-policy.pdf>.

V.III. The Company regularly evaluates the results of the Complaints Investigation in order to identify shortcomings in its operations and potential legal or operational risks. In making this assessment, the Company:

V.III.I. Collects information about similar Complaints related to certain services or products, analyzes this information to determine the root causes of Complaints and priorities for addressing these causes.

V.III.II. Assess whether new Complaints about other services or products may arise for certain underlying causes of Complaints.

V.III.III. Assess whether the root causes of certain Complaints can be addressed and identify methods for addressing them.

V.III.IV. Eliminates the root causes of Complaints if necessary.

V.III.V. Ensures that information on recurring or systemic causes of Complaints is regularly communicated to the General Manager of the Company and that the General Manager is able to perform his functions effectively and ensure that similar Complaints cease to exist.

V.IV. The Rules, including amendments and revisions thereto, shall enter into force on the date of their adoption. The Company's employees must comply with the Rules from the moment the



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employees are acquainted with the Rules. Employees are acquainted with the Rules in writing and must comply with their requirements.