



COMPLAINTS PROCEDURE

1. Claims and complaints

- 1.1. **Complaints:** Complaint means your (the Client's) written request to correct an alleged incorrect procedure or result in the provision of services. The subject of the complaint may include suspected deficiencies in the fulfilment of contractual agreements regarding individual business conditions, or disagreement with the operational, technical or legal implementation of individual actions, as well as complaints regarding operational and security incidents.
- 1.2. **Claims:** A claim is an expression of dissatisfaction in connection with the Framework Contract. This may include a complaint about the inappropriate procedure of our company, the actions of our employees, violation of the agreed conditions, the method of settlement of claims from the contract, as well as a complaint regarding operational security issues and incidents.

2. Mandatory elements of the Complaint or Claim

- 2.1. Claims or Complaints must be made according to the established procedure so that they can be dealt with effectively. They must contain at least the following information:
 - 2.1.1. First name, surname and date of birth, as well as the ID number of the natural person – entrepreneur;
 - 2.1.2. Company name, type of company, and also the legal entity ID number;
 - 2.1.3. contact address, telephone and e-mail address for any further questions;
 - 2.1.4. a concise description, including relevant dates and amounts, in the sense of what the claim or complaint consists of, or what it concerns – the description must be sufficiently specific to be able to deal with the submission (e.g. time data should be given – date of submission, dates on which the events that are the subject of the submission occurred or should have occurred);
 - 2.1.5. other relevant documents that clearly identify the subject of the Claim or Complaint.

3. Deadlines for submitting a Claim or Complaint

- 3.1. You must file a Claim or Complaint without undue delay after you have discovered the reason for filing it, preferably within 10 days of the date of its occurrence and no later than 60 days after the service in question has been performed. Later Claims or Complaints may no longer be taken into account. This is not to say that we will not attend to them. We will. However, the result may no longer be a positive settlement.

4. Filing a Claim or Complaint

- 4.1. You can file a Claim or Complaint in one of the following ways:
 - 4.1.1. By email at podpora@thepay.eu;
 - 4.1.2. by phone on the customer service line +420 565 554 910;

4.1.3. In writing to our address – Masarykovo náměstí 102/65, 586 01 Jihlava, Czech Republic.

5. Processing of Claims or Complaints

5.1. As soon as we receive a Claim or Complaint, it will be forwarded to the CEO Daniel Havel without delay. The employee who received the Claim or Complaint will enter a record in our system so that everything is traceable. If, in exceptional cases, you would like to complain directly to the CEO Daniel Havel, the assessment will be in the hands of the other board member, Michal Kandr.

We will verify whether the Claim or Complaint is made by an authorised person and that it contains all the necessary information to make a decision. If not, we may ask you to submit additional documents and information.

CEO Daniel Havel:

5.1.1. Checks the validity of the Claim or Complaint,

5.1.2. ascertains the information needed to make a decision,

5.1.3. processes and stores the related documentation,

5.1.4. requesting, if necessary, the assistance of colleagues who are obliged to provide it,

5.1.5. makes a decision and issues instructions to inform on the manner of settlement with reasons for the settlement.

5.2. If it is not proven that the claim or complaint is justified, the CEO Daniel Havel will either reject or dismiss the Claim or Complaint. If you disagree with how the Claim or Complaint has been handled, the disagreement is forwarded to the other board member Michal Kandr for review.

5.3. Acceptance and processing of a Claim or Complaint may be refused if:

5.3.1. The Claim or Complaint was filed by a person who is not our client, or the person filing the Claim or Complaint cannot be identified,

5.3.2. the Claim or Complaint does not have the specified elements necessary for the assessment and decision and its deficiencies have not been eliminated even within the period of time specified for this purpose,

5.3.3. processing of the Claim or Complaint is already in progress – in this case, the submission will be treated as a supplement to the claim,

5.3.4. the matter has already been decided by a court or other similar authority or proceedings in the matter have been initiated before a court,

5.3.5. the deadline for submitting a Claim or Complaint has passed.

5.4. We will inform you about the processing of a Claim or Complaint primarily by e-mail, or where appropriate, by express request, by letter to the address you have provided. The costs associated with handling complaints or claims shall be borne by us. A decision on the handling of a Claim or Complaint that does not fully satisfy your request must include a thorough explanation of the position, together with an indication of the possibility of appealing to the Financial Arbitrator.

6. Deadline for processing a Claim or Complaint

- 6.1. After receiving a Claim or Complaint, we will investigate to determine its legitimacy. The deadline for processing a Claim or Complaint is no more than 15 working days from receipt. You are obliged to provide the cooperation necessary to deal with the complaint, in particular, to inform us in a timely, complete and truthful manner of the facts relevant to the assessment of the complaint and to provide the documents necessary for its processing.
- 6.2. If an impediment beyond our control prevents us from responding to a complaint or complaint within 15 business days of receipt at the latest, we will notify you at the time of the impediment that prevents us from responding in time, and we will respond no later than 35 business days after the date of receipt of the Complaint or Claim.

7. Records of Claims and Complaints

- 7.1. We make a record of every Claim or Complaint. The records are provided with the appropriate registration number. Claims and Complaints are recorded in a comprehensive database maintained in electronic form. The record of Claims and Complaints consists of records of received Claims and Complaints and details of their settlement.

8. Information on the possibility of out-of-court settlement of the dispute

- 8.1. You can resolve any disputes out of court through the Financial Arbitrator, with their registered office at Legerova 1581/69,110 00 Prague 1, www.finarbitr.cz. Proceedings before the Financial Arbitrator are governed by Act No. 229/2002 Coll., on the Financial Arbitrator if the dispute falls within his jurisdiction. Disputes can also be resolved through mediation in accordance with Act No. 202/2012 Coll., on mediation.

9. Information on the supervisory authority

- 9.1. The Czech National Bank supervises compliance with the obligations of our company as an electronic money institution, in accordance with § 237 et seq. Act No. 370/2017 Coll., on payment systems.