



Complaints handling policy

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Phoenix payments UAB
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1. COMPLAINTS HANDLING POLICY

1.1. INTRODUCTION

- 1.1.1. At UAB “Phoenix Payments” (hereinafter referred to as the ‘Phoenix Payments’) we place great importance on delivering excellent service to all our customers.
- 1.1.2. Phoenix Payments, a company organised and existing under the laws of Lithuania and having its registered office address at Švitrigailos str. 11M, LT-03228, Vilnius, Lithuania registered with State Enterprise Centre of Registers under number 304920426.
- 1.1.3. The Complaints handling policy (hereinafter ‘the Policy’) is designed to provide guidance on the way Phoenix Payments receives and handles complaints made against the firm. We, therefore, aim at providing adequate and sufficient resources to ensure that this Policy is properly implemented within the firm and communicated to the respective staff members and customers.
- 1.1.4. A complaint under this Policy is defined as any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide our service or a redress determination, which:
 - 1.1.4.1. alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
 - 1.1.4.2. relates to an activity of Phoenix Payments, or of any other individual or entity with whom Phoenix Payments has some connection in marketing or providing their services.
- 1.1.5. At times, complaints can be by way of negative feedback, which may not require a resolution or formal follow-up. While this type of feedback is valuable, the Policy does not apply to feedback of this nature.
- 1.1.6. A complainant under the Policy is defined as any person or entity who is dissatisfied with the service provided by Phoenix Payments, for any reason.

2. HANDLING A COMPLAINT

2.1. INFORMATION

- 2.1.1. When making a complaint, please provide the following information:
 - 2.1.1.1. your name and contact details;
 - 2.1.1.2. any reference (identification of your agreement with us; transaction identification number, etc.);
 - 2.1.1.3. your contact person within Phoenix Payments;
 - 2.1.1.4. the nature of the complaint and what you would like us to do to satisfy your complaint;
 - 2.1.1.5. copies of any documentation supporting the complaint.
- 2.1.2. We cannot consider a complaint if you refer it to us more than:
 - 2.1.2.1. 6 years after the event complained of; or (if later)
- 2.1.3. 3 years from the date on which you became aware that you had cause for complaint.

2.2. ASSISTANCE

- 2.2.1. Although we have made our Policy transparent, quick and easy to follow, if you need assistance in formulating or lodging a complaint, you may contact info@phoenix-payments.com.

2.3. COMPLAINING PROCEDURE

- 2.3.1. You are encouraged to submit your complaint in writing so that the relevant details are clear and complete.
- 2.3.2. All complaints should be addressed to:
- 2.3.2.1. info@phoenix-payments.com – if you wish to submit a complaint by e-mail; or
 - 2.3.2.2. Švitrigailos g. 11M, LT-03228, Vilnius, Lithuania – if you wish to submit a complaint by post.
 - 2.3.2.3. In case if the Client wants to submit the complaint to the Bank of Lithuania as the supervisory authority, the Client may it submit by the following:
 - 2.3.2.3.1. Via the electronic dispute settlement facility E-Government Gateway;
 - 2.3.2.3.2. By completing a Consumer Application Form and sending it to the Financial Market Supervision Service of the Bank of Lithuania, Žalgirio g. 90, LT-09303, Vilnius, email: frpt@lb.lt;
 - 2.3.2.3.3. By filing out a free-form application and sending it to the Financial Market Supervision Service, Žalgirio g. 90, LT-09303, Vilnius, email: frpt@lb.lt.

2.4. ACKNOWLEDGEMENT

- 2.4.1. We are committed to acknowledging all complaints upon receipt.
- 2.4.2. Once a complaint has been received, we will undertake an initial review of the complaint.

2.5. YOUR RIGHTS

- 2.5.1. You have the right to enquire as to the status of your complaint by contacting the person who has been identified to you as handling your complaint.
- 2.5.2. It should not be necessary for you to seek professional help, but if you choose to employ a solicitor, complaints handling firm, financial adviser or other as your representative, this does not affect the way we review your complaint.

2.6. RESPONSE

- 2.6.1. Once complaint is received, Phoenix Payments assigns the person to handle the complaint – depending on the nature of complaint the firm assigns either Phoenix Payments Compliance Officer or Local Manager.

- 2.6.2. Once we have reviewed your complaint, we will provide you with written response and in the form of:
 - 2.6.2.1. **Summary Resolution Communication**, if we managed to find appropriate solution to your complaint within a period of 3 business days; or
 - 2.6.2.2. **Final Response** within 15 business days of receiving the complaint in which we may: (1) accept your complaint and, where appropriate, offer redress or remedial action; or (2) offer you redress or remedial action without accepting your complaint; (3) reject your complaint giving you our reasons for doing so.
- 2.6.3. We will endeavour to resolve complaints within 15 business days of receiving the complaint, but this will not be possible on all occasions.
- 2.6.4. Where our review exceeds 15 business days, due to reasons beyond our control, we will contact you to inform you of the reasons for the delay, and indicate to you when we expect to be in a position to complete our review, which will not be later than 30 calendar days of receiving the complaint.

2.7. FEES AND PAYMENTS

- 2.7.1. Phoenix Payments does not charge fee for acceptance and for investigation of customers` complaint.
- 2.7.2. Phoenix Payments will not be liable for any costs incurred if you decide to employ a representative.
- 2.7.3. In the instances where a complaint is upheld and redress is due, Phoenix Payments will only make payment to the bank account held by you even if you have been represented by a third party.

2.8. FURTHER ACTION

- 2.8.1. If you are dissatisfied with the manner in which your complaint has been handled or you consider that your concerns have not been fully addressed, you have the right to:
 - 2.8.1.1. ask Phoenix Payments for reconsideration of the response you have received; or
 - 2.8.1.2. refer the matter to an external dispute resolution body, such as Bank of Lithuania.

3. PROVISION OF INFORMATION

- 3.1. Phoenix Payments retains a record of all received complaints and the measures taken for its resolution for 8 years from the date the complaint was initially received.
- 3.2. Phoenix Payments provides Bank of Lithuania with an annual report on complaints received.

4. FINAL PROVISIONS

- 4.1. All Complaints will be analysed for the identification of systemic or recurring problems. If such problems are identified we will consider what actions it may need to take to address these problems.
- 4.2. The Policy will be reviewed periodically, and at least annually, to aim to enhance its delivery of efficient and effective outcomes.
- 4.3. In preparing this Policy, we have endeavoured to align our procedures with the relevant legal requirements and current best practice. In particular, this Policy is designed to satisfy the requirements of the Lithuanian Law - The Examination Of Complaints Received By Financial Market Participants.