



# COMPLAINT HANDLING POLICY

2024-06-31

Phoenix payments UAB  
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## DOCUMENT INFORMATION

Author	Marketing Manager		
Person or department responsible for the revision of the Policy	Operations Department		
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Person responsible for implementation	Head of Operations		
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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 or entity 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 or business practices.
- 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 (if applicable);
  - 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 when you became aware that you had a 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 [support@phoenix-payments.com](mailto:support@phoenix-payments.com).

## 2.3. COMPLAINT 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. [support@phoenix-payments.com](mailto:support@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 the Client wants to submit the complaint to the Bank of Lithuania as the supervisory authority, the Client may submit it using the following channels:
    - 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](mailto:frpt@lb.lt);
    - 2.3.2.3.3. By filling out a free-form application and sending it to the Financial Market Supervision Service, Žalgirio g. 90, LT-09303, Vilnius, email: [frpt@lb.lt](mailto: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. COMPLAINT HANDLING PROCESS

- 2.6.1. Once a complaint is received by Phoenix Payments the initial processing takes up to one business day.

- 2.6.2. All communication with the complainant is handled by the Customer Support team unless the nature of the complaint requires the complaint to be escalated to a member of the Compliance team.
- 2.6.3. The complaint is initially reviewed by a member of the Customer Support Team, who registers the complaint in the internal Complaint Handling Registry, assesses the nature of the complaint, and either starts handling the complaint or, in cases where the complaint falls out of the Customer Service department scope, escalates the complaint to other departments.
- 2.6.4. If additional information is required to investigate the case, the Customer Support Specialist asks the complainant to provide the relevant information or documentation.
- 2.6.5. In cases where the complaint requires additional investigations by other departments, such as Operations, Finance, or AML, the Customer Support Specialist inquires the required department to investigate the case on their part and provides the Customer Support Specialist with the results of the investigation.
- 2.6.6. Upon receiving and registering the initial complaint the Customer Support Specialist responds to the complainant and informs them that the complaint is being handled.
  - 2.6.6.1. If the complaint cannot be handled or resolved within one business day after it is received, the Customer Support Specialist informs the complainant that the complaint is still being investigated and provides an approximate timeline.
- 2.6.7. Once the investigation of the complaint is finalized, the Customer Support Specialist or, in cases where the complaint has been escalated, the handling employee informs the complainant of the outcome of the investigation.
  - 2.6.7.1. In cases where the resolution of the complaint requires financial compensation, or other form of compensation, the final decision is approved either by the managerial body of the department, or the CEO of Phoenix Payments.
- 2.6.8. The case is closed once the final response agreeing with the outcome is received from the complainant or once 30 days have passed since the last outreach to the complainant.
  - 2.6.8.1. If the complainant does not agree with the outcome of the investigation, the investigation is re-opened and alternative resolutions are explored, and if available, negotiated with the complainant.
  - 2.6.8.2. Once the complainant agrees with the final resolution of the complaint the case is closed.

## 2.7. RESPONSE

- 2.7.1. Once a complaint is received, Phoenix Payments assigns the person to handle the complaint – depending on the nature of the complaint the Company assigns either a Phoenix Payments Compliance Officer or Local Manager.
- 2.7.2. Once we have reviewed your complaint, we will provide you with a written response in the form of:

- 2.7.2.1. **Summary Resolution Communication**, if we managed to find an appropriate solution to your complaint within a period of 3 business days; or
- 2.7.2.2. **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.
- 2.7.3. We will endeavor to resolve complaints within 15 business days of receiving the complaint, but this may not be possible in every instance.
- 2.7.4. 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 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.

## 2.8. FEES AND PAYMENTS

- 2.8.1. Phoenix Payments does not charge fees for acceptance and for investigation of complaints.
- 2.8.2. Phoenix Payments will not be liable for any costs incurred if you decide to employ a representative.
- 2.8.3. In the instances where a complaint is upheld and redress is due, Phoenix Payments will only make payment to the bank account held by the person or entity who endured financial loss or other grievances, even if they were represented by a third party.

## 2.9. FURTHER ACTION

- 2.9.1. 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:
  - 2.9.1.1. ask Phoenix Payments for reconsideration of the response you have received; or
  - 2.9.1.2. refer the matter to an external dispute resolution body, such as the Bank of Lithuania.

# 3. PROVISION OF INFORMATION

## 3.1. COMPLAINANT DATA RETENTION

- 3.1.1. 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.
  - 3.1.1.1. Once the 8-year period of complaint data retention expires, the complaint data is anonymized and retained for record-keeping and statistical purposes.
- 3.1.2. Phoenix Payments provides the Bank of Lithuania with an annual report on complaints received.

### 3.2. COMPLAINT REGISTRY

- 3.2.1. Every complaint is registered in the internal Phoenix Payments Complaint Registry, this registry contains all the information relevant to the complaint and its resolution, and the contact details of the complainant.
- 3.2.2. The purpose of the Customer Complaint Registry is to track the customer complaint process, analyze and report on the handling, outcome, and amount of the complaints within the Phoenix Payments company.

## 4. FINAL PROVISIONS

- 4.1. All Complaints will be analyzed 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 endeavored to align our procedures with the relevant legal requirements and current best practices. In particular, this Policy is designed to satisfy the requirements of the Lithuanian Law - The Examination Of Complaints Received By Financial Market Participants.