



## COMPLAINTS HANDLING POLICY

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# 1 INTRODUCTION

Hapic LTD (“**Hapic**”) has established this formal Complaint Handling Policy (“Policy”) to give a framework for dealing with (potential) Customer complaints in a prompt and professional manner.

This document, which has been created to meet legal and regulatory standards and requirements, sets out the complaints procedure and is designed to deal with complaints made by actual or potential Customers.

Any Customer, potential Customer or former Customer, or other relevant stakeholder will be provided written information about this Policy upon their request or upon confirmation of receipt of a (formal) complaint.

This policy should be read carefully alongside our Client Agreement and other relevant policies.

## 1.1 PURPOSE

The aim of this Policy is to ensure that all Customer complaints or complaints from potential Customer (both hereinafter referred to as "Customer complaints"), either written or verbal, are handled in a consistent manner and we comply with legal and regulatory requirements and guidance. Where a Customer has cause to complain, the complaints handling procedure will be followed in every instance and a record will be made of the complaint nature and details to help improve our services and reduce the occurrence of similar complaints.

Hapic is committed to delivering a fair, open and clear process for complaints aiming to provide a fair and satisfactory outcome for all Customers who raise a complaint.

## 1.2 SCOPE

This policy applies to all Customer complaints and/or statements of dissatisfaction, whether made verbally, by email or in writing.policies.

## 1.3 DEFINITIONS

For the purpose of this Policy, the following definitions are relevant:

**Business Day:** Monday to Friday excluding official public holidays of the Republic of Cyprus.

**Client or Customer:** A legal or natural person who has signed a Client Agreement and related contractual documents with Hapic.

**Client Agreement:** agreement between a Client and Hapic on the provided E-money and payment services, which contains the general rights and obligations that apply between Hapic and the Client.

**Hapic:** Hapic LTD, an e-money institution incorporated in Cyprus and licensed and regulated by the Central Bank of Cyprus.

**Website:** The Website of Hapic which is being held at [www.hapic.com](http://www.hapic.com) and can be accessed via multiple domain names used by Hapic and/or the Hapic Group.

## 2 WHAT IS A COMPLAINT?

A complaint is defined as an expression of dissatisfaction in relation to the services provided or conduct exhibited by Hapic. This may cover a range of customer grievances, including the complaints handling process itself, the speed and quality of responses, issues with transactions, account management, customer service, fees, or security.

Any person, legal entity or their representative may submit a complaint if they are dissatisfied with the products or services provided by Hapic.

## 3 COMPLAINTS HANDLING

### 3.1 RECEIVING COMPLAINTS

We encourage clients to express their dissatisfaction to our customer support who will be able to promptly respond and provide clarifications, guidance or resolution of the issue. This can be done via the following channels:

- web chat
- email to customer support via [\*\*support@hapic.com\*\*](mailto:support@hapic.com)
- by phone on (+357) **25008800**

We are committed to an efficient and responsible resolution of client complaints and we aim to resolve such matters, referred to as informal complaints, the soonest possible or within 5 business days, in a responsible and transparent way. In most cases an investigation may not be required given the clear nature of the complaint, and a resolution can swiftly be provided by Customer support.

Customer Support and all of us at Hapic take your feedback seriously and despite our best efforts to keep you satisfied, we also give you the opportunity to make a formal complaint by following the procedure described below.

## 3.2 ESCALATING COMPLAINTS

If you are not satisfied with the response provided to you, then you may raise this further with our Complaints team by following the official complaint procedure outlined below.

Before escalating the complaint, we recommend you to read our Client Agreement, and our Fees schedule.

## 3.3 FORMAL COMPLAINTS

A formal complaint should be escalated to the complaints department via email, address to [complaints@hpic.com](mailto:complaints@hpic.com)

Please provide the following details before submitting your formal complaint:

- Company Name
- Your name and contact details
- Nature of the complaint
- Date of incident and any names or contact persons with Hpic
- Description of the issue, stating briefly and clearly the facts relating to the complaint
- Copies of any documentation to support the complaint.

## 3.4 RESPONDING TO FORMAL COMPLAINTS

Our complaints team will receive and acknowledge your complaint within three (3) business days. It will record and independently investigate and reply to your complaint in an efficient, objective and impartial manner.

In normal circumstances, we aim to respond to you the soonest possible, and within one (1) month from the date we have received your complaint, for all types of complaints, except for those relating to payments services. However, depending on the nature and complexity of the issue it may take us longer to provide you with our response. If we do not respond within one month, we will provide you with the reasons for not doing so, together with an estimated date that you should expect to receive our response.

With regards to complaints related to payment services, we will provide you with a response within 15 working days. As above, in exceptional cases, if more time would be required, we will let you know about the reasons for our delay and provide you with a likely deadline for our final reply.

Upon completing our review and investigation of your complaint we will email you and inform you of our final decision.

### 3.5 YOUR RIGHTS AFTER THE COMPLAINTS PROCESS

In cases when, following our final response you remain unhappy with the way we have dealt with your complaint, you can refer this to the Financial Ombudsman Service (FOS) by following certain steps that are outlined in their website. FOS is an independent organisation that helps resolve client complaints.

Details of FOS are shown below:

- Website: [www.financialombudsman.gov.cy](http://www.financialombudsman.gov.cy)
- Address: 5 Kypranoros street, 1061 Nicosia
- Phone: +357 22 848900
- email - complaints: [complaints@financialombudsman.gov.cy](mailto:complaints@financialombudsman.gov.cy)
- email - information: [enquiries@financialombudsman.gov.cy](mailto:enquiries@financialombudsman.gov.cy)

## 4 DATA PROTECTION

All personal information provided during the complaints process is handled in accordance with data protection laws, including the General Data Protection Regulation (GDPR) in line with our Data Privacy Policy.