

## COMPLAINTS POLICY

### 1. General Provisions

1.1. The Complaints Policy (hereinafter – the “**Policy**”) determines the requirements for filing, processing, and responding to the Complaints submitted to Wittix, UAB (hereinafter – the “**Complaints**”).

1.2. This Policy has been prepared in accordance with the Law on Payments of the Republic of Lithuania, the Law on Electronic Money and Electronic Money Institutions of the Republic of Lithuania, the Rules of the Procedure for the Out of Court Settlement in the Bank of Lithuania of Disputes between Consumers and Financial Market Participants, approved by Resolution No. 03-23 of the Board of the Bank of Lithuania on 26 January 2012 and according to the Rules for handling complaints received by financial market participants, approved by Resolution No. 03-105 of the Board of the Bank of Lithuania on 6 June 2013.

1.3. The purpose of the Policy is to organize the process of the Complaints management in a fair, efficient and proper manner. The Policy aims to promote a respectful, inclusive environment and protect the rights of Customers by resolving conflicts effectively.

1.4. Scope of the Policy:

- (a) Unauthorized or unprocessed payments.
- (b) Delays in Company's processing or disbursement.
- (c) Service issues or disruptions.
- (d) Customer service-related issues (e.g., rude behavior, unprofessional conduct).
- (e) Any other concerns regarding our Company's services.

1.5. Definitions:

**Applicant** – a natural or legal person (including, but not limited, to Customer, might be potential client or its representative, client of another financial market participant, insured person, injured third party) approaching Company with the Complaint regarding the services provided by the Company and/or contracts concluded with the Company;

**Complaint** – a written request submitted by the Applicant to the Company stating that the rights or legitimate interests of the person (entity) have been violated in relation to the services provided by the Company or the contracts concluded, and requesting to meet Applicant's requirements;

**Company** – Wittix, UAB, legal entity code 304900982; Electronic money institution license No. 48, issued on 30 May 2019 (issued by the Bank of Lithuania), having its registered office at Goštauto st. 12A, Vilnius, Lithuania;

#### Wittix UAB

Registration code: 304900982

A. Goštauto str. 12A, Vilnius 01108, Lithuania

office@wittix.com | www.wittix.com



**Consumer** – a natural person who has entered into a service agreement with the Company for purposes, unrelated to his business, trade, craft or profession;

**Customer** – a natural or legal person that uses the Company's services to store, transfer, or manage electronic money for transactions, payments or other financial activities;

**Reply** – a written response to the Complaint.

1.6. This Policy does not apply if:

(a) the Complaint indicates an activity of the Company that is not regulated by the laws of the Republic of Lithuania and the laws of the European Union, and is unsupervised by the Bank of Lithuania;

(b) the Company is not responsible for the execution of the activities specified by the Applicant in their Complaint.

1.7. In the event referred to in clause 1.6.(b) of this Policy, the Company is obligated to reply to the Applicant, stating the grounds for refusing to receive the Complaint.

1.8. The provisions of these Policy relating to the out-of-court dispute settlement procedures shall apply insofar as they are in line with other provisions governing out-of-court settlement procedures of Consumer disputes which the Consumer starts against the Company.

## **2. Submission of Complaints**

2.1. The Applicant may submit the Complaint by:

(a) by e-mail using Company addresses: [helpdesk@wittix.com](mailto:helpdesk@wittix.com) or [office@wittix.com](mailto:office@wittix.com);

(b) by filling a form on the Company's website: Contact form [wittix.com/contact](https://wittix.com/contact)

2.2. The Complaint may be submitted through a representative whose powers have been approved in accordance with the procedure established by the laws of the Republic of Lithuania.

2.3. When submitting the Complaint, the Applicant must specify:

(a) name, surname or company name;

(b) the name and surname of the individual acting on your behalf (if applicable), the capacity in which said individual is – acting (if applicable);

(c) the contact details (address, phone number and / or email);

(d) the date of filing the Complaint;

(e) the essence of the Complaint, i.e. the actions of the Company, its employees and / or other representatives – complained of, the reasoned, precise and clear claims, information confirming the full facts of damage (if applicable), – payment amount (if your complaint relates to a payment);



- (f) the request to the Company;
  - (g) other circumstances related to the Complaint.
- 2.4. The Complaint should be accompanied by:
- (a) copies of supporting documents (e.g. payment order, account statement, etc.);
  - (b) document confirming the representative's authority to act on your behalf (e.g. power of attorney or other document stating his / her right to act on behalf of you) (when the complaint is submitted by the authorized representative);
  - (c) other available documents related to the Complaint, if necessary;
- 2.5. If at least 1 (one) of the required details referred to in clause 2.3. and 2.4. of this Policy is not specified, the Company shall have the right to request the Applicant to complete the Complaint. The Complaint will be considered as submitted properly only when all required details referred to in clause 2.3. and 2.4. of this Policy provided.
- 2.6. The above requirements are applicable to the Consumers.
- 2.7. If the Consumer wishes to apply to the Bank of Lithuania as the out-of-court dispute resolution authority, then he shall apply to the Company, in respect of the violation of his rights or legal interests protected by law, no later than 3 (three) months from the date on which he became aware or ought to have been aware of the violation of his rights or the interests protected by law.
- 2.8. The Complaints shall be received in writing in Lithuanian or English language.
- 2.9. The Complaint submitted by email must be signed by the Applicant or the Applicant's representative with a qualified electronic signature.

### **3. Examination of the Complaint**

- 3.1. The Company shall examine the Complaint no later than 15 (fifteen) business days from the date of receipt of the Complaint, unless further documents and / or information are required to investigate the Complaint.
- 3.2. In exceptional cases, when, for reasons beyond the control of the Company, it is not possible to provide an answer within 15 (fifteen) business days, the Company shall send an incomplete answer, clearly indicating the reasons for the delay in the answer to the Complaint and the deadline by which the Consumer will receive the final answer.
- 3.3. In any case, the maximum term for the submission of the final answer shall not exceed 35 (thirty-five) business days from the date of receipt of the Complaint.
- 3.4. The final answer will be submitted to the Consumer in Lithuanian or English language (depending on the language of the received Complaint) via the same channel the Complaint has been received (unless otherwise indicated by the Applicant).



3.5. Company examines Complaints free of charge.

#### **4. Confidentiality and Data Protection**

4.1. We respect your privacy. All Complaints are handled with strict confidentiality, and any personal or financial information shared will be stored and processed in compliance with our Privacy Policy and data protection laws.

4.2. Company provides the Bank of Lithuania with an annual report on the Complaints received.

#### **5. Dispute Resolution by Supervising Authority**

5.1. Consumer can submit a Complaint to the Bank of Lithuania, in the order stipulated by the Law on the Bank of Lithuania, the Law on the Protection of Consumer Rights, and the Rules of the Procedure for the Out of Court Settlement in the Bank of Lithuania of Disputes between Consumers and Financial Market Participants, approved by Resolution No. 03-23 of the Board of the Bank of Lithuania of 26 January 2012, as follows:

- (a) by post to Totorių st. 4, LT-01121 Vilnius, Lithuania;
- (b) via email to the Bank of Lithuania: [prieziura@lb.lt](mailto:prieziura@lb.lt);
- (c) by submitting the application via electronic Consumer dispute resolution system: Dispute Settlement. [consumer application form](#)

5.2. More information regarding the disputes between Consumers and financial market participant can be found: Dispute Settlement by the Bank of Lithuania.

5.3. Consumer within 1 (one) year from the date of submission of the Complaint to the Company has the right to apply to the Bank of Lithuania for a resolution of the dispute.

5.4. Please note that if your complaint is related to the personal data rather than provision of financial services, you should follow rules established within Wittix privacy notice. You may also address the complaint to the State Data Protection Inspectorate: L. Sapiegos st. 17, LT-10312, Vilnius, Lietuvos Respublika; [ada@ada.lt](mailto:ada@ada.lt), more information available via <https://vdai.lrv.lt/lt/>.

5.5. Please note that even if you are not a Consumer and the out-of-court dispute settlement procedure specified above does not apply to you, you have a right to reach out with your claim to the court.

