

Effective as of June 16, 2021

General provisions

1. Complaints handling rules (hereinafter - the Rules) establish the rules and procedures regulating the submission, acceptance, examination of the Applicants' Complaints regarding financial services provided by the Company and/or the agreement concluded with the Company, the submission of Responses to the Applicants' Complaints.
2. The Rules shall not apply when:
 - A. Applicant submits the Complaint concerning the Company's activity which is not regulated by the special laws and is not supervised by the Bank of Lithuania;
 - B. The Company is not responsible for the execution of the activity indicated in the Applicant's Complaint;
 - C. Disputes related to Clients' authorized payment operations made with the cards.

Terms and definitions

Client/Applicant - a natural or legal person to whom the Company provides financial services submitting the Complaint concerning the financial services provided by the Company and/or the agreement concluded with the Company;

Company – FINCI, UAB, legal entity code 304934066, registered address Mėnulių str. 11-101, LT-04326 Vilnius, Lithuania, holding electronic money institution license No. 60 issued on 5 December 2019, licensed and supervised by the Bank of Lithuania;

Complaint – a claim filled in the Company's complaint form and submitted by the Applicant to the Company in accordance with these Rules where the Applicant indicates that Applicant's rights or legitimate interests related to the financial services provided by the Company or agreement concluded with the Company have been breached, and requests to meet his/her requirements;

Complaint form - a complaint form developed by the Company, which can be found on the company's [website](#) in the section legal documents.

Complaint examination – the activity of employees of the Company concerning acceptance, registration, examination of the Complaints, submission of the Responses to the Applicants;

Complaint register – register where all Complaints of the Applicants provided and received in compliance with these Rules are registered;

Consumer – a natural person who acts for purposes other than his or her business, trade or professional activities;

Response – a reply to the Applicant's Complaint submitted by the Company in accordance with these Rules.

Submission of the Complaints

3. The Applicants can submit the Complaint to the Company only in writing:
 - A. by sending it via online banking message filling in the Company's complaint form; or
 - B. via e-mail talk@finco.com with attached Complaint filling in the Company's complaint form and its annexes (if any) signed with a qualified electronic signature.
4. If the Client submits the Complaint to the Company verbally, and reaching an agreement in negotiations fails to be possible, the Company's employee receiving a verbal Complaint invites the Client to make his/her Complaint in writing by filling in the Company's complaint form.
5. The Complaint and its annexes (if any) must be either in the Lithuanian or English language. If the Complaint and/or its annexes are in other languages, the Company has the right to request the Complaint and/or documents to be translated into the Lithuanian or English language. The translation into Lithuanian or English must be certified by the translation office and/or the translator's signature, which must be certified by a notary public.
6. The Complaint must be duly signed by the Applicant or his authorized representative.
7. In the Complaint the Applicant must specify:

- A.** in case of the natural person – name, surname, date of birth or personal number, address, contact details (e-mail and / or telephone number);
 - B.** in case of the legal person – company name, legal entity code, registered address, contact details (e-mail and telephone number);
 - C.** the date of filing the Complaint;
 - D.** date of breached of Applicant's rights;
 - E.** matter of the Complaint - Applicant's rights or legitimate interests that have been breached and description of circumstances which led to the Complaint;
 - F.** the Applicant's requirements to the Company;
 - G.** documents evidencing the specified circumstances (if such exist).
- 8.** In case the Complaint is submitted by the Applicant's authorized representative, the Complaint must be filled together with the documents confirming the identity of the representative and document confirming authorization to act on Applicant's behalf. In addition, in the Complaint the Applicant's authorized representative must indicate both the Applicant's and his details in accordance with clause 7 of the Rules.
- 9.** Applicant who has closed his / her account with Company must submit the documents confirming his/her identity together with complaint . Company reserves the right not to review the Applicant's complaint if:
- A.** no identification documents are submitted;
 - B.** Company is unable to identify the Client.
- 10.** If the Client refers to a document that is not freely available to the Company, the Company may ask the Client to enclose that document with the Complaint.

Examination of the Complaints

- 11.** The Complaint shall not be accepted or examined, if:
- A.** the Complaint does not comply with the requirements set in the Rules (e.g. clauses 3, 4, 5, 6, 7, 8 of the Rules);
 - B.** the identity of the Applicant or authorized representative (if any) is not clear or the Complaint has been submitted in a way not allowing a proper verification of the Applicant's or authorized representative's identity;

C. the Complaint contains incomplete, unreadable or unclear information.

12. In case of the circumstances provided for in clause 10 of the Rules or in the case the Complaint lacks documents, information needed for its examination, the Company has the right to request the Applicant to eliminate such deficiencies within the term set by the Company. If the Applicant eliminates the deficiencies within the set term, the Complaint is considered to be provided to the Company on the day when the Company receives the Complaint/its annexes compliant with the requirements set in the Rules, the clarified Complaint and/or needed documents, information.

13. Complaints based on the same circumstances or grounds that were submitted by the same Applicant and solved by the Company are not examined.

Submission of the Response to the Applicant

14. The Complaint shall be examined and the Response shall be submitted to the Applicant as soon as possible, but not later than within 15 (fifteen) business days from the date of receipt of the Complaint from the Applicant, except where the legislation or other binding regulations related to the provision of Services of the Company (e.g., rules of international payment card organizations VISA/MasterCard etc.) provide for a different period of time.

15. The term set in clause 13 of the Rules commences from the date of receipt of the Complaint, unless clause 11 of the Rules applies. Upon receiving the Complaint, the Company will confirm that the Complaint has been received.

16. In case the Complaint cannot be examined within the term set in clause 13 of the Rules, the Company shall inform the Applicant and specify the circumstances and the new term within which the Complaint will be examined and Response provided.

17. The Complaint received by the Company after 16 p.m. on the business day of the Company, shall be considered to have been received on the following business day of the Company.

18. After examining the Complaint, the Response of the Company shall be provided through the same channel in which the Complaint has been provided, unless the Applicant instructs to provide the Response in a different way which is acceptable to the Company.

19. When the Applicant's Complaint is not satisfied or is satisfied partially, the reasons for the refusal to satisfy the Complaint, as well other remedies shall be indicated in the Response to the Applicant.

20. Responses to Complaints shall be drafted in the Lithuanian or English language.

- 21.** If the Applicant is not satisfied with the decision made by the Company, the Applicant shall have the right:
- A.** to refer the matter to the competent court of the Republic of Lithuania;
 - B.** to refer the matter to the Bank of Lithuania, if the Applicant is considered to be the Consumer. More information about the possibility to apply to the Bank of Lithuania is available on the internet site <https://www.lb.lt/en/sfi-disputes-between-consumers-and-financial-market-participants> of the Bank of Lithuania. The Applicant who is the Consumer intending to apply to the Bank of Lithuania shall, not later than within 3 (three) months from the date such Applicant became aware or ought to have become aware of the violation of his rights or lawful interests, apply to the Company.

Final provisions

- 22.** The Applicant and Applicant's authorized representative (if any) are responsible for correctives, accuracy of the information, personal and contact data provided in the Complaint.
- 23.** All Complaints, which are provided in compliance with these Rules, are recorded in the Complaint register of the Company.
- 24.** The Company stores the Complaints, data related to the examination, documents which provide a particular result of the examination and Response provided to the Applicant at least 3 years from the date of providing the final Response to the Applicant.
- 25.** Depending on the situation, the Company keeps the right to decide if the other or additional legitimate mean of identification proof should be requested (e.g. copy of your ID document certified by a notary public or any other additional document or method which could let to confirm identity).
- 26.** The filling of Complaint and Complaints handling process at the Company is free of charge.
- 27.** The Company reserves the right to update, change or replace any part of the Rules by posting updates and/or amendments and/or alterations to its website, updating the "Effective as of" date at the top of these Rules.