

1. INTRODUCTION

NEC Pay Ltd (further in the text as the “Company”), being licensed and regulated Electronic Money Institution (“EMI”) under the laws of the Republic of Cyprus with license number xxx.x.x.xx/xxxx.

2. PURPOSE AND PRINCIPLES

We at NEC Pay strive to ensure that we maintain high standards of customer care, unfortunately there may be circumstances where you feel that we have not delivered on these high standards.

In case of complaints, we will endeavor to do our utmost to resolve complaints as efficiently and effectively as possible. Your opinion and especially any complaint is important to us and we want you to be entirely satisfied with the service you receive from us.

Information in relation to a complaint will be treated as strictly confidential. Upon receipt of your complaint, we shall send a written acknowledgement to you by either email or letter.

3. DEFINITION

Complaint means a statement of dissatisfaction addressed to a firm by a natural or legal person relating to the provision of the Company’s regulated services (under the Directive (EU) 2015/2366 of the European Parliament and of the Council “PSD2” and the Electronic Money Law of 2012 “Law”).

Complainant means a natural or legal person who is presumed to be eligible to have a complaint considered by the Company and who has already lodged a complaint.

4. FILING A COMPLAINT

In case of complaint regarding Company's services, complainant must submit the respective COMPLAINTS FORM below describing in detail the claims that occurred via email. Client's complaint is received and managed by Customer Support division. We will then send you a letter / email acknowledging your complaint and will let you know the name of the person who will be dealing with your complaint. The letter/ email will contain details of our Complaints' Policy and of your right to refer the complaint to the Financial Ombudsman Service, if you are dissatisfied with our assessment and ruling. You can expect to receive our letter / email within 5 business days of us receiving the Complaint.

4.1 REQUIREMENTS

Complaints must be submitted in writing and English and/or Greek language, in understandable and clear manner. All oral complaints will be heard but will not be accepted for formal processing.

4.2 COMPLAINT'S DETAILS

INFORMATION DECLARED

1.Name, surname.

2.Wallet ID.

3.Contacts – phone number and e mail address.

4.Full residential address.

5.Description of the claim/complaint, disclosing circumstances such as: date, time, transaction number, actions taken during the incident.

6. Any attachments regarding the complaint such as: screenshots, correspondence with support, received confirmation emails regards transactions, etc.

4.3 DELIVERY OF COMPLAINT

All Complaints must be delivered as follows:

A Complaint should be made in writing using the available Complaint Form (Appendix A – see below) and sent by email to complaints@necpay.eu and/or by registered mail to:

NEC Pay Ltd
Driadon 1, 1st Floor, Office 107,
6041 Larnaca, Cyprus

The Complainant should sign the Complaint Form, and when the Complainant is a legal entity, partnership or other body corporate, should be signed by a person with appropriate authority.

5. RECORDING OF COMPLAINT

We will record your complaint and provide a summary of it to our regulator. These details must include as a minimum the nature, date and method of communication of the complaint, your details, how the complainant was dealt with (outcomes), whether the complaint was upheld or refuted, whether the complaint was closed or whether it remains open and outstanding, what financial redress or other significant outcome resulted from the complaint. Private Information will not be shared with any other third parties, as NEC Pay complies with EU the General Data Protection Regulation 2016/679.

6. INVESTIGATION

The investigation process starts immediately after the submission of a formal written complaint and confirmation that it is an Actionable Complaint through an Acknowledgment Letter / email and registration / recording of it in the Company's Complaints Registry and to the Regulator. We will aim at all times to conduct our investigation competently, diligently and impartially, obtaining additional information as necessary.

7. INITIAL RESPONSE

We will initially contact you, via email, no later than 15 working days from receipt of your complaint, to inform you of the progress of investigation of your complaint and of any measures being taken in the meantime for the complaint' resolution from our part ("initial response").

8. ACKNOWLEDGEMENT OF RECEIPT OF RESPONSE

If you respond to our Initial Response, we will acknowledge receipt of response within 5 business days.

9. FINAL RESPONSE / DECISION

The Company will inform the Complainant of the outcome of the investigation, together with any proposed remedial action. The action taken may include among other a simple but sincere apology (if no monetary damage was caused), fixing the cause of the problem and offering the Client a compensatory reward, or any combination of the above. The Company should also provide justification and detail the reasoning behind any rejected Complaint. All complaints should be resolved promptly within a maximum of thirty (30) working days from the date of the official receipt of the Complainant or within a reasonable time from their receipt and recording by us.

Finally, the Company will inform the complainant that he/she may refer the Complaint, if not satisfied with the Company's final response, to file a complaint with the Financial Ombudsman of Cyprus subject to this complaint falling within the scope of the Financial Ombudsman Law. For any other cases, the consumer is advised to take legal advice for the resolution of the dispute.

The details of the Financial Ombudsman of the Republic of Cyprus are:

Address: 13 Lord Byron Avenue, 1096 Nicosia

Phone: +357 22848900

Facsimile (Fax): +357 22660584, +357 22660118

Website: www.financialombudsman.gov.cy

Email: complaints@financialombudsman.gov.cy

Financial Ombudsman: fin.ombudsman@financialombudsman.gov.cy

The details of Central Bank of Cyprus are:

Address: 80 Kennedy Avenue, 1076

Nicosia Phone: +357 22714100

Facsimile (Fax): +357 22714959

Website: www.centralbank.cy

10. COMPLAINTS RECORDS

We retain records of all complaint receive and the measures taken for five years from the date of the complaint received. This record may be used to help the Financial Ombudsman if necessary.

In handling complaints, we aim to identify and remedy any recurring or systematic problems, for example by:

Analyzing the causes of individual complaints so as to identify whether there are any root causes common to types of complaint;

Considering whether such root causes may also affect other processes or products, including those not directly linked to your complaint; and

Where we can reasonably do so, correcting such root causes.