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REQUESTS AND COMPLAINTS HANDLING POLICY

No VP-21-08

1. GENERAL TERMS AND CONDITIONS

1.1. CHANGE HISTORY

Version No.	Date	Brief description of change
1.0.	01.03.2018	Initial version
1.1.	25.01.2021	<ul style="list-style-type: none"> ● Definitions added; ● More detailed description of responsibilities; ● Response terms ● Complaint/Request templates, other annexes.
1.2.		<ul style="list-style-type: none"> ● Adjustments to point 3.9 for acceptance requirements for submission of requests and complaints ● Definition of responsible actor for 4.1 registration of received requests/complaints ● Adjustments to the 5.6 in relation to the accepted languages for the requests/complaints ● Risk assessment actor change section 8. for monitoring of requests and complaints ● Adjustment to Annex 1 with the flow ● Unauthorised and fraudulent transaction handling specifics (3.9,5.4,5.8,7.1.5,7.1.6) and forms (annexes 8-12)
1.3.	08.10.2024	<ul style="list-style-type: none"> ● Added 1.3.3. for information publishing on the website

		<ul style="list-style-type: none"> • Added point 3.5.1. of the avoidance of the conflict of interest • Update to Annex 4: Template of Complaints' and Requests registration journal
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1.2. RELATED DOCUMENTS

Document type	Title
Law of the Republic of Lithuania	Law on Electronic Money and Electronic Money Institutions
Law of the Republic of Lithuania	Law on Consumer Protection
Law of the Republic of Lithuania	Law on the Bank of Lithuania
Resolution of the Bank of Lithuania	Rules for the handling of complaints by financial market participants

Mantas Staliūnas

Managing director

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1.3. PURPOSE

- 1.3.1.** The purpose of the Policy is to assist VIALET to meet its legal obligations related to requests and complaints handling process. This Policy establishes the procedures for investigation customers or potential customers requests/complaints regarding financial services provided by VIALET and/or concluded agreements. The Policy is internal and applies to every employee of VIALET. All principles described in the Policy must be strictly followed.
- 1.3.2.** Inquiries about the processing of personal data are handled according to Procedure on Handling Data Subjects Requests and Complaints.
- 1.3.3.** Information on how to complain, including but not limited to forms, requirements, responsibilities, timelines, shall be uploaded under the supervision of the appointed responsible for the Complaints handling employee (Head of Customer Support unit) on company's website (www.vialet.eu) in a respectful and understandable manner for the user.

2. DEFINITIONS

- 2.1. Asana** - VIALET used an IT program for internal tasks generation and tracking.
- 2.2. CEO** – Chief Executive Officer of VIALET.
- 2.3. CCO** - Chief Compliance Officer (Head of Compliance Department) of VIALET.
- 2.4. COO** - Chief Operations Officer (Head of Operations Department) of VIALET
- 2.5. Complaint** - a written inquiry from the Customer to VIALET stating that the rights or legitimate interests of the Customer have been violated in relation to the services provided or contracts concluded by VIALET and requesting that the Customer's claims be met.
- 2.6. Complaints Board** – VIALET's collegial decision-making body deciding on important Requests/Complaints and consisting of CEO, CCO, COO and the Head of Legal.
- 2.7. Complaints registration journal** - a journal or equivalent computerized document registration system that registers Complaints received from Customers.
- 2.8. Consumer** - a natural person seeking to conclude or concluding agreements with VIALET for purposes not associated with his business, trade, craft or profession (consumption purposes).
- 2.9. Customer** – any natural person or legal entity who uses, has used or has expressed a wish to use or is in other way related to any of the services provided by VIALET.
- 2.10. Request** – Customer's request to submit information about the service rendered and/or to refund of payment resulting from unauthorized/incorrect payment transaction, that has no signs of a Complaint.
- 2.11. Responsible unit** – Client Support Department of VIALET appointed as a responsible for Complaints and Requests handling process.
- 2.12. Supervisory Authority** – Bank of Lithuania (if the Complaint concerns the provision of financial services) or State Consumer Rights Protection Authority (if the Complaint concerns standard or unfair terms and conditions of consumer agreement) Contact details of Supervisory authorities are provided in Annex 6.
- 2.13. VIALET** – UAB “Via Payments”, registration number 304531663, legal address Konstitucijos pr. 7, Vilnius, Lithuania, operating under the brand name “VIALET”.

3. SUBMISSION AND THE REQUIREMENTS FOR THE REQUESTS AND COMPLAINTS

- 3.1. VIALET employees must make every effort to ensure that Customers are satisfied with the services and responses received, as well as to avoid conflicts with Customers and to resolve any problems, that may arise, in a peaceful manner.
- 3.2. If the Customer has questions about the provided services, their quality, unauthorized payment transactions, etc. and these questions have no signs of a Complaint, such request is considered as Request.
- 3.3. The Customer believing that VIALET has violated the Customer's rights and/or interests protected by the laws related to the provision of financial services and/or concluded agreements, may refer to VIALET by submitting a Complaint.
- 3.4. A Request/Complaint received through any channel and by any VIALET employee must be forwarded to the complaints@vialet.eu for the handling of Responsible unit without delay, together with any attachments received.
- 3.5. **Separation of Request and Complaint:** upon receipt of the document, the Responsible unit must evaluate the form and content of it and assign it to the Request or Complaint category. In case of doubt of assignment to the Complaint or Request category, the Responsible unit's employee shall contact his/her immediate supervisor.
 - 3.5.1. In order to avoid conflicts of interest, the Complaint must be taken, evaluated and handled by employee that was not involved in the process of the object of the Complaint. In case the Complaint would be submitted where there is a foreseen conflict of interest of the Head of Complaints handling unit, decision making shall be escalated to the CCO.
- 3.6. The Request should be made in writing and include the following information:
 - 3.6.1. The Customer's personal data: name and surname/legal name, personal/legal code, residency/registered address, phone number and e-mail address;
 - 3.6.2. Date of the Request;
 - 3.6.3. A request to submit information about the service rendered and/or to refund of payment resulting from unauthorized/incorrect payment transaction.
- 3.7. The Complaint should be made in writing and include the following information:
 - 3.7.1. The Customer's personal data: name and surname/legal name, personal/legal code, residency/registered address, phone number and e-mail address;
 - 3.7.2. Date of the Complaint;
 - 3.7.3. Circumstances which are appealed in the Complaint;
 - 3.7.4. The complaints and claims of the Customer.
- 3.8. If the Customer complains orally and has not yet made a written inquiry or the written inquiry is not clear, Customer should be offered to fill in the Request form (Annex 2) or Complaint form (Annex 3). However, if the Customer does not wish to fill in the template offered by VIALET, the Customer must not be forced to fill it in, but in any case Customer must to provide his Request/Complaint in writing (e.g. by e-mail).
- 3.9. If Request or Complaint is related to Unauthorised or Fraudulent transaction, customer must be informed using template in Annex 10 to fill in the relevant form accordingly: Fraudulent Transaction Dispute form (Annex 8) or Unauthorised transaction dispute form (Annex 9)
- 3.10. The Request/Complaint might be submitted via:
 - 3.10.1. Mail delivered at complaints@vialet.eu or other registered address of VIALET, which must be forwarded by the employee to complaints@vialet.eu for further processing;
 - 3.10.2. Chat in the Mobile App of VIALET and on the webpage vialet.eu, which must be forwarded by the employee to complaints@vialet.eu for further processing;
 - 3.10.3. For the requests/complaints expressed in other ways of communication with VIALET, such as (but not limited to) Facebook, LinkedIn, etc. employee must advise to submit the request/complaint via e-mail to complaints@vialet.eu for processing, otherwise it will not be registered;

- 3.11.** If the Request/Complaint is submitted by representative, it must be provided with identity and authorisation evidencing documents: copy of an ID card/passport of authorised person and power of attorney/representation agreement evidencing the right to represent the Customer.

4. REQUESTS AND COMPLAINTS REGISTRATION

- 4.1.** All Requests/Complaints submitted to VIALET must be registered on the same business day by Customer Support Department representative in Requests/Complaints module in A.Clients drive - > Complaint management folder - > Complaints / Request Journal
- 4.2.** All Requests/Complaints and all correspondence with the Customer are saved by Responsible unit in the relevant Customers' documents files together with other Customer's documents in A.Clients drive creating a corresponding folder for the customer
- 4.3.** All Complaints related data is additionally recorded by Responsible unit in the Complaints registration journal (standard template is provided in Annex 3) that is saved in Google Drive folder in A.Clients drive - > Complaint management folder - > Complaints / Request Journal within 5 working days from the date of dispatch of the response to the Customer or Supervisory Authority.

5. INVESTIGATION OF THE REQUESTS AND COMPLAINTS

- 5.1.** Complaints and Requests segregation (levels):

5.1.1. Individual inquiries:

These inquiries are specific for the particular customer and do not spread over other accounts. All individual inquiries are registered in Complaints / requests registration journal . Based on classification of the inquiry, the priority of the case will be established and Major Complaints/Requests will be treated before the minor ones.

Minor Complaint / Request - Customer is unsatisfied with the provided service, but no funds or access to funds for the customer was affected. Cases are treated in chronological sequence.

Major Complaint / Request - Customer is unsatisfied with the provided service, when customer faced issues accessing or using his funds. Cases are treated based on the impact / amount of funds in question.

5.1.2. Widespread inquiries:

Resembling inquiries received from multiple Customers:

0	Trivial	When Customers claims that they lack the knowledge and do not know how to proceed with desirable action	Managed by #tags in Intercom. Overall tendencies are followed on the monthly basis and relevant changes and help articles are created.
1	Bug	When Customers faces technical issue and are not able to use the system	Customer shakes the phone to report a bug or report it to VIALET otherwise. Bug should be forwarded to IT department in order to get an advise and fix the problem. In case at one period of time amount of similar inquiries raises significantly, IT department can change the status of the bug to Incident.
2	Incident	Major event when many Customers	Incident should be registered in Incident

	are facing identical issue related to the core IT system / function.	report and managed by incident management procedure.
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- 5.2. Head of Responsible unit shall ensure that Responsible unit's personnel have the skills, knowledge and experience required for the execution of this function.
- 5.3. While investigating the Request/Complaint, the Responsible unit employees and other VIALET employees must follow these principles: respect to human rights, justice, fairness, reasonableness, objectivity, impartiality and efficiency.
- 5.4. The Requests/Complaints are investigated on free of charge basis, nonetheless, chargeback requests are charged with the fee according to pricing customer agrees to upon entering business relationship with VIALET.
- 5.5. The Responsible unit employee appointed for the Request/Complaint investigation collects all the information necessary for the investigation (chronology of events, if any - copies of the related agreements signed by the Customer, information provided by the relevant VIALET employees, etc.).
- 5.6. If the Request/Complaint does not comply with the requirements set in this Policy, is written in other than Lithuanian, English, Latvian or Russian language, is disorder and unreadable or the identity of the Customer is not clear or if there are other deficiencies, the Responsible unit should act proactive and e.g. contact the Customer, try to translate the text, find out the necessary circumstances and help the Customer to solve the issue.
- 5.7. In case the submitted Request/Complaint lacks the information needed for the investigation, the Responsible unit shall ask the Customer to eliminate the shortcomings by specifying the essence of the Request/Complaint or providing additional documents or data needed for the investigation. In such case, the Responsible unit sets a 5 calendar days time limit to Customer to eliminate the shortcomings.
- 5.8. In order to collect the necessary internal information, the Responsible unit shall also raise the case in Asana to the Head of relevant VIALET's department and set priority to High or Critical for cases related to fraud and unauthorised transactions. The Head of relevant department must ensure the reply and attachment all required documents within the time limit set in Asana. All cases related to unauthorised transaction, fraudulent transaction disputes and chargebacks must be forwarded to dispute@vialet.eu for assessment.
- 5.9. If the submitted Request/Complaint does not comply with the requirements set in these Policy or the Customer or his representative has not eliminated the shortcomings within the set deadlines, VIALET stops investigation of the Request/Complaint and provides a relevant written answer the Customer or his representative. Such circumstances do not prevent the Customer from contacting VIALET repeatedly after the identified shortcomings are eliminated.

6. DECISIONS' MAKING

- 6.1. The Responsible unit's employee shall provide to the Head of Responsible unit all information related to the Request/Complaint and presents the proposed decision.
- 6.2. The Head of Responsible unit, after acquaintance with material, approves the proposal or indicates a different decision.
- 6.3. If the received Request/Complaint may pose a risk to the image of VIALET, possible disclosure of information to the media, possible loss or damage exceeding EUR 500, sanctions from state institutions etc. the Responsible unit employee informs Head of Responsible unit. Head of Responsible reviews the material, prepares a written proposal and send it together with the Request/Complaint and all necessary documentation to the Complaints Board for a final decision.

Upon receipt of the Complaints Board decision, the Responsible unit shall continue to prepare the response to the Customer.

- 6.4. VIALET investigates the Request/ Complaint in accordance with the Policy and applicable laws and makes one of the following decisions:
 - 6.4.1. To satisfy the Request/Complaint of the Customer;
 - 6.4.2. To partially satisfy the Request/Complaint of the Customer;
 - 6.4.3. To reject the Request/Complaint.
- 6.5. If VIALET acknowledges the Customer's Request/Complaint as valid and decides to meet it fully, the Customer is informed thereof in a written final response, indicating in which way and by what deadlines the corrective actions will be taken, and/or the Customer's losses will be compensated along with deadlines.
- 6.6. When the Request/Complaint is rejected or only partially satisfied, VIALET in its response to the Customer specifies arguments of rejection to fully satisfy the Request/Complaint, other measures which might the Customer use to defend its interest, including, but not limited to, potential dispute resolution means, including Customer's right to apply to the Supervisory Authority regarding a dispute.
- 6.7. The decision of VIALET regarding the Complaint is recorded in the Complaints' registration journal.

7. SUBMISSION OF THE RESPONSE TO THE CUSTOMER

- 7.1. VIALET provides the Customer with a written response(s) to a Request/Complaint in the following terms:
 - 7.1.1. VIALET submits the response about receipt of the Request/Complaint within **5 business days** (the template is provided in Annex 5). If the issue is resolved within 5 business days, the initial letter of receipt of the Request/Complaint shall not be sent, but the relevant written notice of the resolution of the issue shall be sent;
 - 7.1.2. A Request/Complaint regarding the services provided by VIALET must be investigated and a response submitted within **15 business days**. In exceptional situations, if the response cannot be provided within 15 business days for reasons beyond the control of VIALET, it must send a non-final reply, clearly indicating the reasons for a delay in replying to the Request/Complaint and specifying the deadline by which the Customer will receive the final reply. In any event, the deadline for providing the final reply may not exceed **35 business days** from the receipt of the Request/Complaint.
 - **N.B.:** it should be noted that the Responsible unit is prohibited from abusing the 35 business day deadline, i.e. all Requests/Complaints must be responded within 15 business days and only in objectively justified exceptional cases, that can be substantiated by documentary evidences, a deadline for reply not exceeding 35 business days is possible.
 - 7.1.3. If the Consumer (natural person) complains about unfair agreement terms and conditions and/or challenges VIALET's standard terms and conditions on the grounds of unfairness and violation of consumer rights, a relevant Request/Complaint must be investigated and a response submitted within **14 calendar days** as stipulated in Law on consumer protection of the Republic of Lithuania;
 - 7.1.4. According to the Law on Payments of the Republic of Lithuania, VIALET as payer's payment service provider shall refund the amount of the unauthorized payment transaction to the payer without delay and no later than the end of the **next business day** after becoming aware of or informed about the unauthorized payment transaction and, where applicable, restore the balance of the account, which would have been the case if the unauthorized payment transaction had not been executed,

unless the VIALET as payer's payment service provider has reasonable grounds to suspect fraud and inform the Supervisory Authority in writing of those reasons.

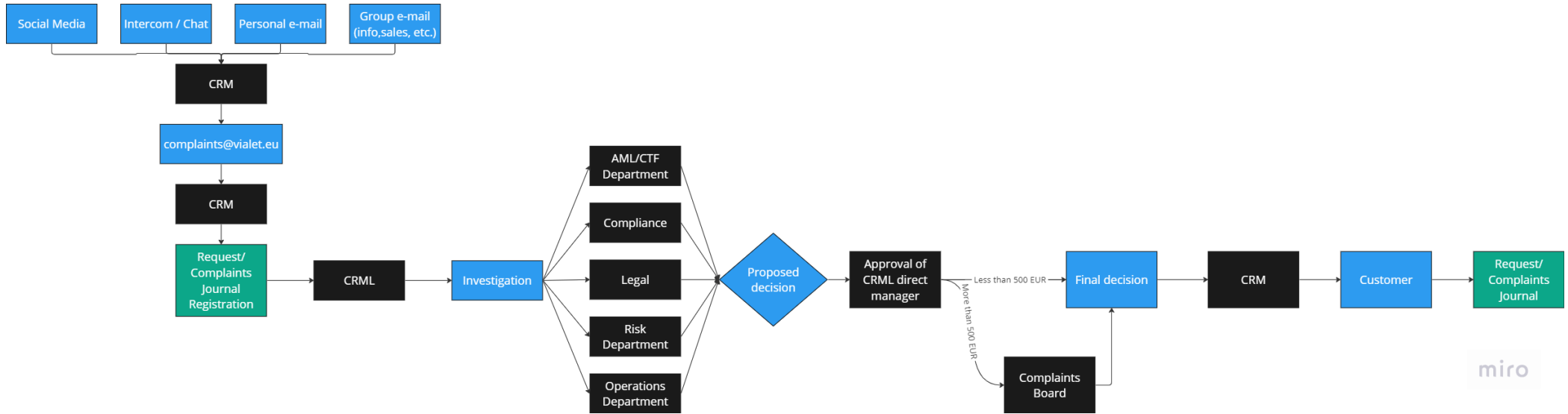
- 7.1.5. In cases when raised transaction disputes or chargebacks are deemed not applicable after the evaluation of the responsible department, customer must be informed on the outcome regardless, using template from Annex 11.
- 7.1.6. Whenever transaction dispute or chargeback has been assessed and decision has been provided by the relevant department, answer to the customer, about the resolution of the claim must be provided using template in the Annex 12.
- 7.2. VIALET stores the Complaints, data related to the investigation, documents which provide a particular result of the investigation and response provided to the Customer at least 10 years from the date of providing the final response to the Customer. All information, documents and communications are stored in VIALET's internal register in chronological order.

8. MONITORING OF REQUEST AND COMPLAINTS

- 8.1. In order to determine shortcomings of its activities and potential operational or legal risk, Risk Department constantly assesses the Requests/Complaints' investigation results. By performing this assessment Risk Department:
 - 8.1.1. Collects information on similar Requests/Complaints related to certain services or products, performs an analysis of this information in order to identify the main reasons of these Requests/Complaints, also to determine priorities for the elimination of these reasons;
 - 8.1.2. Assesses whether essential reasons of certain Requests/Complaints might lead to new Requests/Complaints regarding other services or products;
 - 8.1.3. Assesses whether essential reasons of certain Requests/Complaints might be eliminated and determines methods of their elimination;
 - 8.1.4. Informs by email the relevant VIALET employee who, in the opinion of the Risk Department, is responsible for the relevant process in VIALET, and provides its recommendation on a possible solution of the issue;
 - 8.1.5. Assures that the repetitive or systemic reasons of Requests/Complaints would be regularly communicated to the Managing Board of VIALET and that the CEO could effectively perform its functions and ensure that similar Requests/Complaints would not occur.
- 8.2. Risk Department reviews the Complaints registration journal and Requests information once a quarter.

9. FINAL PROVISIONS

- 9.1. Enforcement of the Policy shall be the responsibility of the Management Board and CEO. The process shall be supervised by the Responsible unit.
- 9.2. Responsible unit shall review the Policy annually and propose modifications hereof to the Management Board as necessary.
- 9.3. The Policy, including its amendments, comes into force from the day of their approval. The employees of VIALET must comply with the Policy from the moment the employee is introduced to the Policy.



miro

Legend:

CRM - Client Relationship Manager

CRML - Client Relationship Manager Lead

Complaints Board - CEO, CCO, COO and the Head of Legal

REQUEST REGARDING SERVICE/ PAKLAUSIMAS DĒL PASLAUGOS

_____ (date/data) _____ (time/laikas)

Client's name and surname / company name Kliento vardas ir pavardė / įmonės pavadinimas			
Personal code /company code Asmens / įmonės kodas		Email/E. paštas	
T.		Address/Adresas	

REASON FOR THE REQUEST (Please select 1. or 2.)/KREIPIMOSI PRIEŽASTIS (Prašome pasirinkti 1. arba 2.)
<p>1. <input type="checkbox"/> I kindly request to submit information about the service rendered and/or to perform control of the service rendered /service quality/Prašau pateikti informaciją apie suteiktą paslaugą ir/ar patikrinti suteiktos paslaugos/ap tarnavimo kokybę:</p> <p>2. <input type="checkbox"/> I kindly request your assistance related to a refund of payment resulting from unauthorized/incorrect payment executed using:/ prašau tarpininkauti susigrąžinant lėšas dėl neautorizuoto/neteisingai atlikto mokėjimo, kuris atliktas: <input type="checkbox"/> VIALET payment card and/or by using its data/VIALET mokėjimo kortele ir/ar naudojant jos duomenis; <input type="checkbox"/> VIALET App or Internet Bank/ VIALET programėle arba internetinėje bankininkystėje; <input type="checkbox"/> At ATM by using VIALET payment card/ Bankomate naudojantis VIALET mokėjimo kortele; <input type="checkbox"/> Other/ Kita.</p>
TO BE FILLED OUT, IF ITEM 2 IS MARKED/UŽPILDYKITE, JEI PAŽYMĖJOTE PUNKTĄ Nr. 2

- I performed the financial transaction, however the transaction amount is incorrect/Atlikau finansinę operaciją, tačiau operacijos suma neteisinga;
 - After paying by payment card I noticed that funds were repeated written-off/Po atsiskaitymo mokėjimo kortele, pastebėjau pakartotinį lėšų nurašymą;
 - I did not get a service/poor quality product and the merchant does not respond per 30 days (copies of the request and response to be appended)/Negavau prekės/nekokybiška prekė ir prekybininkas neatsakė į mano laišką per 30 d. (reikalinga pridėti kreipimosi ir atsakymo kopiją);
 - I did not perform any financial transaction, it is unknown to me and I did not authorise any private individual/legal entity to perform it/Finansinė operacija man nežinoma, aš jos neatlikau ir neįgaliojau atlikti kito fizinio/juridinio asmens;
 - Other/Kita
-
-
-
-

Transaction date/ Operacijos data	Transaction venue/ Operacijos vieta	Transaction amount/ Operacijos suma

Customer's account number/Kliento sąskaitos numeris:
.....

I have been informed that VIALET have the right to forward the submitted request and/or use and provide my personal data to other legal persons in case it concerns the situation and request investigation/Esu informuota (-as), kad VIALET turi teisę perduoti pateiktą paklausimą ir/ar naudoti ir teikti mano asmens duomenis kitiems juridiniams asmenims, jei tai susiję su nurodyta situacija bei jos nagrinėjimu.

Customer's signature, name, surname/Kliento parašas,
vardas, pavardė

COMPLAINT REGARDING INADEQUATELY RENDERED SERVICE/ PRETENZIJA DĖL NETINKAMAI SUTEIKTOS PASLAUGOS

_____ (date/data) _____ (time/laikas)

Client's name and surname / company name Kliento vardas ir pavardė / įmonės pavadinimas			
Personal code /company code Asmens / įmonės kodas		Email/E. paštas	
Tel.		Address/Adresas	

COMPLAINT CIRCUMSTANCES AND CONTENT/PRETENZIJOS APLINKYBĖS IR TURINYS
<p>2. When did you learn about possibly inadequately rendered service/ breach of rights and the agreement? What service is provided inadequately?/Kada Jūs sužinojote apie galimai netinkamai suteiktą paslaugą/teisių ar sutarties pažeidimą? Kokia paslauga suteikta netinkamai?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<p>3. Please specify the reason of your complaint and circumstances (preferably specify the agreement number, signature date)/Nurodykite kreipimosi priežastį ir aplinkybes (pageidautina nurodyti paslaugos sutarties numerį, sudarymo datą).</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<p>4.</p> <p>5. Did you contact VIALET in relation with this case before? Please specify the place, date, and your telephone number, email and received response/Ar kreipėtės dėl šio atvejo į VIALET anksčiau? Nurodykite vietą, datą, iš kokio tel. numerio, el. pašto kreipėtės, Jums pateiktą atsakymą.</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<p>6. Decision offered by you or your requirements if any?/Jūsų siūlomas sprendimas ar reikalavimai, jei jų turite.</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<p>7.</p> <p>8. Have you got any documents and/or information proving the circumstances?/Ar turite dokumentų ir/ar pagrindžiančios aplinkybes informacijos? Yes/Taip <input type="checkbox"/> No/Ne <input type="checkbox"/>.</p>

9.	
10.	Documents
appended/Pridedami dokumentai:	
1.	
2.	

How would you like to receive an answer/Kokiu būdu norėtumėte gauti atsakymą: Via VIALET App/VIALET programėlėje; By email/El. paštu; By mail/Paštu.

I have been informed that VIALET have the right to forward the submitted complaint and/or use and provide my personal data to legal persons in case it concerns the situation and request investigation/Esu informuota (-as), kad VIALET turi teisę perduoti pateiktą pretenziją ir/ar naudoti ir teikti mano asmens duomenis kitiems juridiniams asmenims, jei tai susiję su nurodyta situacija bei jos nagrinėjimu.

Customer's signature, name, surname/Kliento parašas,
vardas, pavardė

Annex 4: Template of Complaints' and Requests registration journal

												Select from the drop down options only											
Type	Level	Department	Month	Date Received	Channel of complaint provision	Response date	Customer Name	Type of client	Customer address (indicated in the complaint)	Complaint Handler	Acknowledgement date	BOL complaint parameter	Reason for the complaint	General Admin/Customer Service Issues	Area of dissatisfaction	Brief description	Upheld, Rejected or Pending further investigation	Nature of response	Date of final response	Compensation paid (£/€/€/\$)	Fees waived (£/€/€/\$)	Outcome / any other comments	Relation to known bug / incident

Annex 5: Acknowledgment the receipt of the Request/Complaint

Subject: Regarding your request/complaint (choose one) about xxxxxxxxxxxx

Dear xxxxxxxxxxx

Thank you for your recent communication which we received on (DATE), regarding [reason for the request/claim].

We are very sorry to learn of your dissatisfaction and can confirm we will be conducting a thorough investigation into your concerns.

We understand your inquiry to be in relation to:

- (Point out key aspects for investigation...)

If our understanding of your inquiry is not correct, or if there is any additional information that you feel would be relevant to the investigation, please provide it within 5 days of reception of this letter.

We will therefore investigate your concerns and respond to you in [fill in business/calendar days according Policy], with our findings or with an update on the progress of the investigation.

Should you have any questions or concerns, please do not hesitate to contact us.

Finally, we would like to thank you for bringing this matter to our attention.

Yours sincerely,
VIALET support

Annex 6: Response to the Request/Complaint

Dear xxxxxx

Your request/complaint (choose one) about xxxxxxxxxxxx

We refer to our response dated (DATE) regarding your xxxxxx.

We would firstly like to offer our apologies that you were put to the trouble regarding xxxxxx

We would like to clarify the situation in respect of your inquiry, as follows: (WHAT HAPPENED AND WHY?)

Also we would like to thank you for bringing these matters to our attention and enabling us to take remedial action. We would like to offer the following as a resolution to your inquiry:

(WHAT WE ARE WILLING TO DO TO PUT THINGS RIGHT – IF COMPENSATION IS TO BE PROVIDED PLEASE ADVISE HOW THIS WILL ISSUED/TIMESCALE IF APPLICABLE)

(IF PROVIDING COMPENSATION PLEASE STATE THAT THE PAYMENT IS TO BE MADE IS IN FULL AND FINAL SETTLEMENT OF YOUR COMPLAINT).

We are committed to ensuring all inquiries are fully and fairly addressed and we hope this response adequately addresses your concerns.

If you feel you have additional information to support your inquiry, let us know as we would welcome the opportunity to reinvestigate your concerns.

Alternatively, if you are not satisfied with our answer, you have the right to refer your complaint to the Bank of Lithuania.

The Bank of Lithuania contact details are:

Address: Totorių str. 4, 01121 Vilnius, Lithuania

Telephone: +370 800 50 500 or +370 5 2512763 (when calling from abroad)

Email: info@lb.lt

Or you can visit their website www.lb.lt/gincu-sistema for more information.

Yours sincerely,
VIALET support

Annex 7: Supervisory Authorities contact details

1. If the Complaint concerns the provision of financial services:

Bank of Lithuania

Address: Totorių str. 4, LT-01121 Vilnius

Phone: +370 5 251 2763

Email: info@lb.lt

Website: www.lb.lt/gincu-sistema

2. If the Customer is a Consumer and the Complaint concerns standard or unfair terms and conditions of the service agreement:

State consumer rights protection authority

Address: Vilniaus str. 25, 01402 Vilnius, Lithuania

Phone: +370 5 262 6751

Email: tarnyba@vvtat.lt

Website: <http://www.vvtat.lt>

Fraudulent Transaction Dispute Form

Important notes for the Cardholder:

We require the information on this form from you in order for us to deal with your claim.

This form is only to be used to dispute transactions that you believe are fraudulent. (A fraudulent transaction is one which you did not authorize, participate in, or benefit from.)

Please make sure that you attach all the supporting document(s) including any correspondence you have relating to your dispute and receipt (proof of the transaction) – any missing information could cause delay.

Cardholder Information:

Name on Your Card: _____

Truncated Card Number : _____

Cardholder Address: _____

E-Mail address: _____

Phone: _____

Disputed Transaction Information:

Merchant name (name of the business): _____

Website (if applicable): _____

Acquirer’s Reference Data or Switch Serial Number: _____

Merchant Location (address of the business): _____

No.	Transaction Date	Transaction Amount	Transaction Currency	Disputed Amount

I wish to dispute the above transaction(s) based on the following reason (check one):

The card was lost:

I have reported the card as lost on (date - dd/mm/yyyy) _____

The card was stolen:

I have reported the card as stolen on (date – dd/mm/yyyy) _____

The card was not received:

I have reported the card as not received on (date) _____

The card was compromised – the card was in my possession when the unauthorized transactions took place. I did not authorise or participate in the transaction(s) indicated above or authorise anyone to engage in the transaction(s). In reporting this fraudulent activity, I authorise you to immediately close my card and issue me a new card.

Answer “Y” for Yes and “N” for No to each of the following questions:

1. Have you made any transaction(s) on your card on any computer other than your own in the last 6 months? ____
If yes, please describe the type of purchase you made, the name of the merchant where you made the purchase and date of transaction, if known:

2. Have you allowed anyone else to use the computer on which you made the disputed transaction with your card prior to the disputed transaction date? ____

If yes, whom?

3. Has your card ever been out your possession other than when handed to a cashier? ____

If yes, when did this happen _____ and who had the card _____

4. Have you ever authorised anyone else to make a purchase with your card? ____

If yes, when did you make this authorisation _____ and whom have you authorized _____

5. Have you ever revealed your PIN to anyone else? ____

If yes, when and why did you reveal it _____ and to whom _____

6. Please describe how you keep your PIN private?

7. Do you recognize the disputed transaction amount or date? ____

8. Have you done any transaction(s) with this merchant before? ____

If yes, how many transactions did you make and when were the transaction(s) made:

9. Did you contact the merchant and were unable to resolve the issue? ____

If yes, please describe in detail the result of your contact with the merchant:

10. If any of the disputed transactions took place abroad, have you visited this country/these countries in the last few months? ____

If yes, please provide details if you used your card for any transactions:

Additional information

Please provide a detailed explanation of the above dispute to enable us to understand the dispute, when you noticed it and what actually happened:

Declaration

I hereby certify that the averments made by me within this form are bona-fide and the information provided is true and accurate to the best of my knowledge and belief. I also certify that I did not receive any value or benefit in connection with the disputed transaction(s). In case this dispute is determined to be false or maliciously made, I shall be fully responsible for the consequences. I understand that the investigation may take up to 180 days and the we reserve the right to reverse any interim consideration given in this regard.

I authorize you to share the information above with law enforcement, banking regulators, and other authorised third parties in connection with any investigation of the disputed transaction(s), including any criminal investigation. I agree to cooperate in any such investigation and in the prosecution of any person believed to be responsible for fraudulently using my card.

Your signature _____

Date: _____

Unauthorised Transaction Dispute Form

Important notes for the Cardholder:

We require the information on this form from you in order for us to deal with your claim.

This form is only to be used to dispute transactions that you believe are in error and are not fraudulent. Please make sure that you attach all the supporting document(s) including any correspondence you have relating to your dispute – any missing information could cause delay.

If the dispute's reason is that you did not recognize the transaction, we will first initiate a Retrieval Request with the merchant in question, and request additional transaction information. With this additional information, you still do not recognize the transaction, we will proceed with a Chargeback.

If your claim is that the goods and/or services were not as advertised, or if you did not receive the goods and/or services you paid for, then we will proceed with a Chargeback.

Cardholder Information:

Name on Your Card: _____

Truncated Card Number _____

Cardholder Address: _____

E-Mail address: _____

Phone: _____

Disputed Transaction Information:

Acquirer's reference Data or Switch Serial Number: _____

Merchant name (name of the business): _____

Website (if applicable): _____

Merchant Location (address of the business): _____

Product type (goods or services): _____

No.	Transaction Date	Transaction Amount	Transaction Currency	Disputed Amount

I certify that I have already tried to contact the Merchant to remedy the situation. (please describe in detail the result of your contact with the merchant. Include (1) the date(s) you contacted the merchant; (2) the telephone number/fax number and/or email address you used; and (3) the name of the person you spoke with regarding the dispute):

I wish to dispute the above transaction(s) based on the following reason (check one):

Incorrect amount/currency

The amount/currency charged by the Merchant was different from the amount that I had authorised. The original transaction amount and currency was _____ but the actual charge was this amount and currency _____. Merchant did not inform me prior to the transaction charge about any additional fees or charges.

Credit not processed:

The Merchant agreed to refund the transaction (amount and currency) _____ on _____, but no refund has been processed. I have enclosed a copy of the refund voucher or letter/email from the merchant confirming a refund is due.

Fake/Fraudulent goods alleged to be authentic were purchased:

Merchandise received was identified fake/fraudulent by:

The Company that brand belongs to or an authorised representative _____

A customs/law enforcement/government agency _____

A neutral bona fide expert _____

Cancellation of recurring transaction:

I have notified the Merchant to cancel my recurring membership/subscription on _____, which date is prior to the disputed transaction date.

Unauthorised multiple transactions:

I did authorise at least one transaction for _____ at the above Merchant, but did not participate in the other transaction(s) for _____ and the card was still in my possession at the time of the other transaction(s).

Cancellation of reservation:

I made a reservation and later cancelled on _____.

Non-receipt of goods/services:

I have not received the merchandise/service. Expected delivery was on _____.

Merchandise or service received was not as described/ defective for the following reasons:

Others (please indicate details):

Cardholder Participation:

Did you participate in the transaction? Yes No

Dispute Details:

Please provide a detailed explanation of the above dispute to enable all parties to understand the dispute:

Declaration:

I hereby certify that the averments made by me within this form are bona-fide and the information provided is true and accurate to the best of my knowledge and belief. In case this claim is determined to be false or maliciously made, I shall be fully responsible for the consequences. I understand that the investigation may take up to 180 days and we reserve the right to reverse any interim solution given in this regard.

Your signature _____

Date: _____

Annex 10: Unauthorised or Fraudulent transaction Dispute/ Chargeback acknowledgement template

Subject: Regarding the disputed transactions

Dear **XXXXXXXXXX**,

With this letter we acknowledge receipt of your recent communication on (**DATE**), regarding the disputed transactions.

We are deeply sorry to learn of your incident and in order to proceed with the investigation, we kindly ask you to fill in the attached form and return to us with your artificial signature, or e-signature valid in the EU. Please do provide any additional information that you feel would be relevant to the investigation, whether it may be your communication with the merchant and compelling evidence of your rectitude.

Kindly return the filled-in form within 2 days of reception of this letter to initiate the investigation process.

We also bring to your attention that Via Payments ensures the consistency and safety of the payments, nonetheless, does not bear any accountability for the refund of the disputed amount, and reimbursement ought to be settled on the merchant side.

Should you have any questions or concerns, please do not hesitate to contact us.

Finally, we would like to thank you for bringing this matter to our attention.

Yours sincerely,
VIALET support

Annex 11: Chargeback not applicable response template

Subject: Regarding the disputed transactions

Dear **XXXXXXXXXX**,

We refer to our response dated (**DATE**), regarding the disputed transactions.

We have carefully reviewed your application and would like to clarify the situation in respect of your inquiry, as follows:

Unfortunately, we found no basis to dispute the processed transactions as these are compliant within Card Schemes rules. We also find your provided information insufficient for chargeback initiation.. If you feel you have additional information to support your inquiry, please let us know within 5 days of reception of this letter and we would welcome the opportunity to reinvestigate your concerns.

We are committed to ensuring all inquiries are fully and fairly addressed and we hope this response adequately addresses your concerns.

Alternatively, if you are not satisfied with our answer, you have the right to refer your complaint to the Bank of Lithuania.

The Bank of Lithuania contact details are:

Address: Totorių str. 4, 01121 Vilnius, Lithuania

Telephone: +370 800 50 500 or +370 5 2512763 (when calling from abroad)

Email: info@lb.lt

Or you can visit their website www.lb.lt/gincu-sistema for more information.

Yours sincerely,
VIALET support

Annex 12: Chargeback resolution response template

Subject: Regarding the disputed transactions

Dear xxxxxxxx,

We refer to our response dated (DATE), regarding the disputed transactions.

We would firstly like to offer our apologies that you have experienced inconvenience using the merchant's service. We would like to inform in respect of your inquiry and provide you with the result:

- (1) Your chargeback process was concluded in your favor. The amount of XXX will be settled to your account within 3 business days.
- (2) Your chargeback process was concluded in favor of the merchant. The disputed amount will remain charged. Please note that we have no basis to dispute the amount further. If you keep stating that the disputed amount must be refunded, we kindly recommend you apply for the claim at local authorities.

We are committed to ensuring all inquiries are fully and fairly addressed and we hope this response adequately addresses your concerns.

Alternatively, if you are not satisfied with our answer, you have the right to refer your complaint to the Bank of Lithuania.

The Bank of Lithuania contact details are:

Address: Totorių str. 4, 01121 Vilnius, Lithuania

Telephone: +370 800 50 500 or +370 5 2512763 (when calling from abroad)

Email: info@lb.lt

Or you can visit their website www.lb.lt/gincu-sistema for more information.

Yours sincerely,
VIALET support