

PROCEDURE FOR THE RECEIPT AND HANDLING OF CUSTOMER COMPLAINTS (REQUESTS) OF PAYSERALBANIA SHPK

CHAPTER I

GENERAL PROVISIONS

- 1.** The purpose of the Procedure for the Receipt and Handling of Customer Complaints (Requests) of Paysera Albania SHPK (hereinafter "Procedure") is to ensure a high quality of customer service at Paysera Albania SHPK (hereinafter "Paysera") by effectively handling customer complaints (requests) and resolving related issues.
- 2.** This Procedure applies to all complaints (requests) received in relation to customer services and governs the process of handling, quality, and control of their resolution.
- 3.** The Customer Support Department and other responsible employees of Paysera involved in the process of handling and resolving complaints (requests) must be familiar with this Procedure and comply with it strictly.
- 4.** The terms used in this Procedure shall have the following meanings:
 - 4.1. Response:** means a written response provided to the client addressing the issues and/or requests raised.
 - 4.2. Paysera:** means Paysera Albania SHPK, a licensed institution providing payment and/or electronic money services in the Republic of Albania.
 - 4.3. Client:** means a natural or legal person registered in the Paysera system and who has opened an account.
 - 4.4. Complaint:** means a written complaint submitted by the complainant to Paysera, alleging that the legal rights and/or legitimate interests of a person have been violated in relation to or arising from the services provided by Paysera or the contracts concluded with it.
 - 4.5. Complaints and Requests Register:** means a register where complaints (requests) received directly from clients by post, email, or other electronic means are recorded. This register is maintained electronically and stored by Paysera in accordance with internal procedures.
 - 4.6. Request (inquiry):** means a question or request from a client, oral or written, related to the services or support provided by Paysera, where the resolution is simple and an answer can be provided immediately or during communication with the client.
 - 4.7. Consumer:** means a natural (private) person who uses Paysera's services for purposes not related to their commercial, professional, or business activity.

4.8. Partner: means a third party (natural or legal person) engaged by Paysera to provide services to clients or distribute its products. This term includes **intermediaries, electronic money distribution channels, and other entities operating under partnership arrangements through platforms, websites, or mobile applications via which clients are provided access to Paysera services.**

4.9. Paysera is responsible for handling complaints related to the actions of Paysera network Partners in the provision of its services. Partners must promptly forward to Paysera, but no later than within 1 (one) business day, any complaint received. Paysera ensures that Partners comply with the requirements of this Procedure.

CHAPTER II

REGISTRATION OF CLIENT REQUESTS AND COMPLAINTS

5. The Client has the right to submit a Complaint to Paysera within a reasonable period from the moment they became aware or should have become aware of the circumstances related to a possible violation of their legal rights or legitimate interests, in accordance with applicable law and/or applicable contractual terms.

6. The Client may submit a written request (by sending an email to support@paysera.al or, if the complaint relates to a breach or unfair processing of personal data, to dpo@paysera.al, or by official post to Paysera's address), orally (by phone), or in person in writing at the Customer Support Department.

6.1. If a Complaint is received through a Partner (intermediary), the responsible employee must immediately notify, but no later than within 1 (one) business day, the relevant Client Partner and register the Complaint in the Complaints (Requests) Register (in the intranet). For the purpose of calculating processing deadlines, the date of submission of the Complaint shall be considered the date on which the Client submitted it to the Partner or Paysera. The request and correspondence may be processed in the system (Zammad). During registration, it must be clearly indicated that the Complaint was received through an intermediary (Partner), and all documents, communications, and initial explanations forwarded by the intermediary regarding the Complaint must be attached.

7. Complainants may submit complaints in the Albanian language or in another language if this is provided for and/or agreed with the Company in the contractual relationship. Complaints are accepted and processed free of charge.

8. Client requests submitted orally (by phone or at the Customer Support Department) are answered and the necessary information is provided during the communication. In cases where it is not possible to provide an immediate response to an oral request, the Customer Support employee instructs the client to submit the request in written form.

9. Upon receipt of a written request, the Customer Support employee, independently or in cooperation with the relevant department of Paysera, ensures the handling of the case and the provision of a complete, accurate response within the established deadlines.

10. Clients who consider that their legal rights or interests have been violated due to the actions or omissions of Paysera or its employees have the right to submit a complaint in the following ways:

10.1. By submitting the complaint to Paysera's Customer Support Department via the Paysera application (app), by sending it by email to support@paysera.al or, in cases where the complaint relates to personal data protection matters (e.g. privacy breaches, unfair or unlawful processing of personal data), to dpo@paysera.al

10.2. By sending the complaint by official post to Paysera's address.

10.3. For client identification purposes, only complaints sent from the client's personal email address registered in the Paysera system are accepted; in cases where the complaint is submitted directly by the client via email, it must be sent from the email address declared and verified in the client's account.

10.4. A complaint may also be submitted by an authorized representative of the client (e.g. a lawyer or legal representative). In such cases, the representative must provide documentation proving their authorization to act on behalf of the client (e.g. a notarized power of attorney, in which the right to address Paysera Albania SHPK is explicitly specified). The authorization document is copied and certified by the responsible employee, who notes "Certified copy" as well as their name, surname, position, date, and signature, in cases where it is submitted physically at Paysera Albania offices. A copy of the document is attached to the complaint. In the absence of authorization documentation, Paysera requests its submission before continuing the handling of the complaint.

11. The complaint must contain, at a minimum, the following elements:

11.1. The client's first and last name (for natural persons) or the entity name (for legal persons);

11.2. The client's address;

11.3. The phone number and/or email address;

11.4. The date of submission of the complaint;

11.5. A clear description of the subject matter of the complaint and the rights or interests alleged to have been violated;

11.6. The client's requests to Paysera;

11.7. Supporting documentation, if available;

11.8. A copy of the client's identification document (for natural persons), in accordance with Paysera's identification requirements;

11.9. If the complaint is submitted by a person who is not a Paysera client, the reason for submitting the complaint and its connection to the services of Paysera Albania SHPK must be clearly specified. In the event that one or more of the elements set out in point 11 are missing, Paysera has the right to request that the client complete or clarify the complaint before proceeding with its review.

12. A written complaint must be clear, legible, and signed by the client or their authorised representative. The client's signature may be a handwritten signature or a qualified electronic signature, in accordance with applicable law.

13. Verbal complaints are answered during the communication, while the client is informed that official written responses are provided only for complaints submitted in written form.

14. All complaints submitted to the Customer Support Department or sent by post must be scanned and forwarded by email no later than the next business day to the responsible employee, who registers them in the Complaints (Requests) Register.

15. All complaints submitted to the Customer Support Department or sent by post must be scanned and

uploaded to the client's profile. Complaints sent by email and registered in the Zammad system must be recorded in the client's profile via a reference (Zammad ticket), with a relevant comment identifying the complaint.

15.1 This article applies only to complaints. Requests (inquiries) are not covered by this Procedure and are stored, as applicable, in the Zammad system or email inbox, in accordance with Paysera's internal procedures.

15.2 Complaints received via email at support@paysera.al must be assigned in the Zammad system no later than the next business day to the designated employee, who registers them in the Complaints (Requests) Register.

CHAPTER III

DEADLINES FOR HANDLING COMPLAINTS AND REQUESTS

16. Paysera ensures that all client complaints and requests are handled within the deadlines specified in this Article, in accordance with their nature and complexity.

17. Simple client requests (information, operational clarifications, and general inquiries) are handled and responded to:

17.1. immediately during communication, or

17.2. within a period not exceeding 2 (two) business days from the moment of receipt.

18. Standard client complaints are handled and concluded with a final response within a period not exceeding 15 (fifteen) business days from the date of registration.

19. In cases where the complaint is complex and requires additional verification, involvement of other departments or third parties, the processing period may be extended up to 30 (thirty) business days.

20. In the event of an extension of the complaint handling deadline pursuant to point 19, the client shall be informed in advance within the initial deadline, including:

20.1. the reasons for the extension; and

20.2. the new expected deadline for providing a response.

21. If a client's request does not meet the criteria to be treated as a complaint, it shall be treated as a standard request and shall be subject to the deadlines applicable to informational requests under this Article.

22. Paysera ensures that complaint handling is carried out in a fair, documented manner and within the established deadlines, respecting client rights and service standards.

CHAPTER IV

HANDLING OF COMPLAINTS (REQUESTS)

23. Complaints submitted by clients are investigated, and the official response of Paysera is prepared and signed by the employee appointed by the Head of the Customer Support Department as responsible for handling complaints and preparing responses.

24. Paysera ensures sufficient human resources for the proper handling of complaints and organizes periodic training for employees involved in the complaint handling process.

25. In special cases where a complaint submitted by a client is complex and/or extensive in content, its handling and the preparation of the response are carried out by the Legal Department or the Data Protection Officer.

26. If a complaint relates to improper actions or omissions of a Paysera employee, that employee and their direct supervisor shall be informed of the decision made regarding the complaint.

27. In cases where a request or complaint has been submitted by email to Paysera addresses (e.g., support@paysera.al or dpo@paysera.al or other official Paysera addresses):

27.1. The response to a complaint received by email is sent from the official address support@paysera.al or dpo@paysera.al by the designated employee.

28. A complaint is considered resolved when all investigative actions have been completed, a relevant decision has been made, and an official response has been provided to the client.

29. After reviewing the complaint, Paysera makes a decision to classify it as:

29.1. Accepted - when Paysera determines that the client's claims are justified and takes measures to fulfil them;

29.2. Partially accepted - when the client's claims are partially accepted;

29.3. Rejected - when the client's claims are not substantiated and are not accepted.

30. In the event that Paysera decides to reject or partially accept a client's complaint, the written response must be reasoned and supported by facts, documentation, and relevant legal provisions.

31. Paysera's decision must be justified and based on evidence and applicable legal provisions. The response shall be sent to the client in the language used in the contractual relationship or in another language agreed with the client. In case of rejection of the complaint, the response must be accompanied by supporting documentation, except where such documents have already been made available to the client.

31.1. If the complaint relates to a payment transaction suspected of fraud or carried out through fraudulent actions by third parties, Paysera, during its assessment, takes into account and investigates all relevant circumstances of the transaction and its related links.

31.2. Paysera's written response must include information on measures to protect the client's interests, including the right to further remedies and dispute resolution mechanisms.

31.3 In cases where the client is a consumer, the official response must include information about their right to address the **Bank of Albania** as the supervisory authority at the address public@bankofalbania.org, at the competent **Unit for Alternative Dispute Resolution (ADR)** and/or the **Information and Data Protection Commissioner** through the form <https://idp.al/kontakt/> or email info@idp.al and/or other legal mechanisms for dispute resolution, within the deadlines provided by the legislation in force.

31.2 The written response of Paysera must inform the client about the ways of submitting a complaint to the Bank of Albania, directing them to the official information published on the website of the Bank of Albania: https://www.bankofalbania.org/Mbikeqyrja/Trajtimi_i_ankesave/, in accordance with the procedures established

by this authority.