



KRIPTOMAT

CRYPTO BUT SIMPLE

Complaint Handling Policy



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1. PURPOSE

This Complaint Handling Policy ("**Policy**") ensures a transparent, efficient, and systematic approach to receiving, investigating, and resolving Complaints. It aligns with applicable regulations (including MiCAR Article 71 and EFSRA requirements) and aims to:

- Facilitate prompt and fair resolution of Client concerns.
- Maintain client trust in Kriptomat's services.
- Comply with all relevant laws, regulations, and internal procedures.

2. APPLICABILITY AND SCOPE

Who is Covered

- 2.1. All Employees of the Company, including managers and staff involved in providing Kriptomat services or handling Complaints.
- 2.2. Potential or existing Clients who are using or have used the Company's services or who have expressed an intention to do so.

What is Covered

- 2.3. Any expression of dissatisfaction (written or oral) related to Kriptomat's services, products, fees, contractual terms, or Employee conduct.
- 2.4. The process from initial receipt of a Complaint to its final resolution and follow-up actions.

3. DEFINITIONS

Assigned Handler means the Employee specifically designated to take primary responsibility for investigating and resolving a Complaint.

Board means the management board of the Company.

CCO means Chief Compliance Officer of the Company.

Client Assets means assets including crypto-assets that are held by the Company on behalf of clients.

Client means any natural or legal person who uses, has used, or has expressed the intention to use the Services.

Company means FintechX OÜ, Estonian registry code 14424637.

Complaint means any expression of dissatisfaction, whether written or oral, submitted by a Client or a Potential Client concerning Kriptomat's services, products, fees, contractual terms, or conduct of its employees.

Complaints Registry means a database, Jira, maintaining records of Complaints.

Customer Support Team means the group of Employees responsible for front-line interactions with customers, including receiving inquiries and complaints through various communication channels (e.g., phone, email, live chat). This team ensures that new Complaints are promptly registered in the Complaints Registry, acknowledged to the Client, and, if needed, forwarded to the Assigned Handler or relevant department for thorough investigation.

EFSRA is Estonian Financial Supervision and Resolution Authority.

Employee refers to anyone who works for or with the Company, regardless of the contractual arrangement under which the work is performed.

Kriptomat means the Company.

MiCAR means Markets in Crypto-assets Regulation adopted by the European Parliament.

Policy means this Complaint Handling Policy.

Regulations mean applicable laws, regulations, and other regulatory requirements, including MiCAR and guidelines of competent authorities (e.g., EFSRA, ESMA, EBA), specifically the ones referred to as external references on the cover page of this Policy.

Services refers to any service or product that the Company provides to its Clients and Employees.

4. RESPONSIBILITY

Board

- 4.1. Approves this Policy and any subsequent material amendments.
- 4.2. Ensures that sufficient resources are allocated to implement and maintain Complaint-handling procedures.
- 4.3. Oversees compliance with MiCAR, EFSRA, and other relevant regulatory requirements.

CCO

- 4.4. Maintains alignment of this Policy with regulatory requirements and internal risk management frameworks.

- 4.5. Oversees the Complaints process, ensuring timely investigation and resolution.
- 4.6. Conducts periodic reviews of the Complaints Registry and reports significant issues or trends to the Board.

Employees

- 4.7. Must promptly forward any received Complaints (whether direct or discovered indirectly) to the Customer Support Team or CCO, according to internal escalation guidelines.
- 4.8. Must cooperate fully in the investigation of any Complaint.

Customer Support Team

- 4.9. Serves as the first point of contact for Clients submitting Complaints.
- 4.10. Registers all Complaints in the Complaints Registry within one business day.
- 4.11. Acknowledges receipt of the Complaint and forwards it to the Assigned Handler or relevant department for investigation.

5. COMPLAINT SUBMISSION

Submission Channels

- 5.1. Complaints can be submitted via:

Email: support@kriptomat.io

Web portal: <https://kriptomat.io/submit-a-Complaint/form/>

Mail: FintechX OÜ, Osmussaare tn 8, 13811 Tallinn, Estonia

Languages

- 5.2. Complaints can be submitted in English, Estonian or any other supported languages listed on the Company's webpage:

<https://help.kriptomat.io/en/articles/2096100-supported-languages-on-kriptomat>

Fee

- 5.3. Clients are not charged any fee for filing a complaint.

Client Assistance

- 5.4. Should a Client require guidance on how to structure or file a Complaint, they may contact the Customer Support Team. The Customer Support Team will provide general assistance to ensure the Client can effectively submit the necessary details.

6. HANDLING COMPLAINTS

Receipt and Registration

- 6.1. Upon receiving a Complaint—whether written, verbal, or via any other channel—the Customer Support Team must register the Complaint in the Complaints Registry within one business day.
- 6.2. The Customer Support Team shall acknowledge receipt of the Complaint to the Client or Potential Client in clear, plain language. This acknowledgment must include the date the Complaint was received, the name or position of the person responsible for handling it, and an estimated timeframe for resolution.

Initial Assessment

- 6.3. The Company determines the general nature of the Complaint (e.g., billing, technical issues, product dissatisfaction) and identifies relevant data or documentation needed for investigation.
- 6.4. If a complaint is too vague or lacks essential details, the Client is asked to clarify or supplement the information.

Investigation and Impartiality

- 6.5. The Assigned Handler will conduct a thorough and impartial investigation of the Complaint. The Assigned Handler must not be the individual who is the subject of the Complaint or have any conflict of interest as defined below.
- 6.6. Where needed, the Assigned Handler consults with the CCO, the Legal Department, or any other relevant internal stakeholders to gather all necessary facts and documentation.

Response Timeframe

- 6.7. The Company shall provide a final written response to the Client or Potential Client within 15 calendar days from the date the Complaint is first received.
- 6.8. If the Complainant is a corporate entity and the issue is complex, the Company may use up to 30 calendar days for the investigation and response. This must be reflected in the acknowledgment email or a subsequent notice to the Client.

Extension of Deadline

6.9. In exceptional cases, if additional time is required (e.g., due to missing information, complexity of the Complaint, or other justified circumstances), the Assigned Handler shall inform the Client in a form reproducible in writing (email is sufficient). This notice must:

- 6.9.1. Outline the reasons for the extended processing time, and
- 6.9.2. Provide a new reasonable deadline that shall not exceed 35 calendar days from the original receipt of the Complaint.

Resolution Process

6.10. During the investigation, the Assigned Handler may:

- 6.10.1. Request additional information or documentation from the Client,
- 6.10.2. Contact relevant internal departments or third-party service providers (where applicable),
- 6.10.3. Verify whether similar Complaints have been filed before and how they were resolved,
- 6.10.4. Conduct transaction reviews or other due diligence steps.

6.11. All actions must be performed diligently, fairly, and without undue delay.

Final Response

- 6.12. Upon completing the investigation, the Assigned Handler drafts a final response. If the response entails financial compensation or could create a material obligation for the Company, the draft must be reviewed by the CCO or Management Board before issuance.
- 6.13. The final response shall be sent to the Client or Potential Client via the same communication channel used by the Client (or another mutually agreed means).

Outcome and Follow-up

6.14. If the outcome is partially or fully negative, the response must include:

- 6.14.1. The main reasons for the decision;
- 6.14.2. Contact details for the Estonian Consumer Disputes Committee (tarbijavaidluste komisjon) and other available alternative dispute resolution bodies, as well as a reference to the Client's legal right to seek redress in court. The response must also include information about

the possibility of filing a complaint with the EFSRA after the Company becomes supervised by the EFSRA.

7. RECORD KEEPING

- 7.1. All information related to the Complaint—including correspondence, internal notes, and supporting documents—shall be securely stored in accordance with the Company's Privacy Policy in the Complaint Registry.
- 7.2. The Assigned Handler shall update the Complaints Registry with the final outcome, date of resolution, and any recommended follow-up measures (e.g., process changes, employee training, or policy revisions)
- 7.3. All records relating to Complaints must be stored securely for at least 5 years from the date of the last correspondence on the complaint, in compliance with Personal Data Erasure Procedure and MiCAR record-keeping requirements.

8. REPORTING AND OVERSIGHT

- 8.1. The Head of Customer Success Team shall conduct quarterly reviews of the Complaints Registry, identifying trends and systemic issues to report to the Board.
- 8.2. An annual Complaints handling report will be prepared by the Head of Customer Success Team for the Board's review, summarising the volume, nature, and resolution of Complaints.

9. CONFLICTS OF INTEREST

- 9.1. The Assigned Handler must be independent of the subject matter of the Complaint (i.e., they must not be the person or department about whom the Complaint was filed) and must have sufficient authority, knowledge, and resources to carry out the investigation and communicate the final decision.
- 9.2. Complaints involving conflicts of interest will be managed according to the Conflicts of Interest Policy, ensuring impartiality in handling and resolving Complaints.

10. MONITORING AND OVERSIGHT

- 10.1. The CCO or designated manager reviews the Complaint Registry quarterly to identify trends or systemic issues.
- 10.2. An annual complaint-handling report is prepared for the Board, summarising complaint volumes, types, resolutions, and any improvements made.

- 10.3. Material concerns (e.g., repeated complaints about the same issue, significant reputational risk) are escalated immediately to senior management for further action.

11. REVIEW AND AMENDMENTS

Scheduled Reviews

- 11.1. This Policy shall be reviewed annually or more frequently if mandated by regulatory changes, business model adjustments, or operational transformations.
- 11.2. The CCO is responsible for initiating the review process and coordinating input from Operations, IT, Legal, and other stakeholders.

Trigger Events

- 11.3. Regulatory Changes: If MiCAR, EFSRA, EBA, or any other relevant regulatory body introduces new requirements or technical standards, the Policy must be updated as needed.
- 11.4. Internal Changes: Significant modifications to the Operational Handling System (OHS), new Liquidity Provider relationships, or revised risk appetite.
- 11.5. Supervisory Precepts: If the EFSRA or another competent authority issues a directive, the Policy must be adapted accordingly.

Approval of Amendments

- 11.6. All material amendments must be approved by the Management Board.
- 11.7. Minor or administrative updates (e.g., clarifications that do not affect policy substance) may be approved by the CCO alone, with a subsequent written notification to the Management Board within 5 business days.