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## Barion Payment Inc.

# Complaints Handling Policy

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Approved	
Chief Executive Officer	
Compliance Officer	

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# 1. Introduction

In compliance with the provisions of section 288 of Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises, Barion Payment Inc. receives and handles complaints submitted to it in accordance with the following Complaints Handling Policy.

## 2. Options for submitting complaints:

If you have a complaint, you may submit it to our company verbally or in writing.

Complaints can be made **verbally** in two ways:

- in person at our office: Barion Payment Inc., H-1117 Budapest, Infopark sétány 1., VI. floor 2. door, Monday to Friday between 10.00 AM – 11.30 AM and 1.00 PM – 4.00 PM.
- or over the phone, by calling us at +36 (1) 464-7099 on business days, between 8.00 AM and 8.00 PM. In the case of complaints made by telephone, we will answer your call and respond to your concerns within a reasonable time.

If you would like to submit a complaint in **writing**, you may do so in the following manners:

- by delivering the written complaint personally, or having it delivered, to our office: Barion Payment Inc., H-1117 Budapest, Infopark sétány 1., VI. floor 2. door,
- or by post: Barion Payment Inc., H-1117 Budapest, Infopark sétány 1., VI. floor 2. door,
- or by fax: +36 (1) 464-7080
- online on our website in your Barion wallet: [www.barion.com](http://www.barion.com)

When submitting a complaint, you may choose to act through a proxy. In this case, the power of attorney granted to your proxy must comply with the requirements stipulated in Act III of 1952 on Civil Procedure.

Current and earlier versions of the Complaints Handling Policy can be downloaded from Barion's website.

## 3. Investigation of the complaint:

The investigation of the complaint is performed free of charge; naturally, we do not charge a separate fee for this. While complying with the provisions of the law, we thoroughly review all complaints, taking all related circumstances into consideration in order to determine the measures to be taken.

You may report a complaint at any time to our customer service staff, whether in person at our office, by telephone, online or in writing.

### 3.1. Verbal complaints (in person or by telephone):

Complaints submitted verbally are investigated immediately, and – where possible – remedied immediately.

Insofar as the complaint cannot be responded to and remedied immediately, or if you are not satisfied with the information you have received here, our customer service staff will make a written record of the complaint and of the

position of Barion Payment Inc. in this respect. You will receive one copy of this record on the spot, while the substantive response will be sent to you at the same time as you receive a telephonic response completing the procedure. In this case, we will send you a reasoned answer to your complaint within 30 days of its submission.

**Records of complaints must contain the following data:**

- a) your name, address, headquarters and postal address, if required,
- b) the place, time and manner in which the complaint was submitted,
- c) a detailed description of the complaint, including an itemized list all of the claims/objections forming part of the complaint, so that all of the aspects of the complaint can be thoroughly investigated,
- d) a list of the papers, documents or other evidentiary elements which you have presented,
- e) contract number connected with the complaint and, depending on the case, the user number,
- f) a statement by our company expressing our position with regards to the complaint, if you were not satisfied with our response to the complaint,
- g) the name of the person taking the record and your signature (except in the case of complaints made by telephone),
- h) place, date and time at which the record was compiled,
- i) in the case of a complaint submitted by telephone, a unique identifier code for the complaint (this code will be given to you when you submit the complaint).

In addition, we record all complaints submitted by telephone and keep these recordings for 1 year. On request, you may listen to these recordings within this time period. We will also place a certified transcript of the recording at your disposal free of charge if requested.

If you wish, you may make an appointment over the phone to meet in person. You will be offered an appointment time within five working days from your request.

## **3.2. Written complaint:**

In addition to the above, you may also put your complaint in writing and submit it to our office staff in person, or, using our contact information above, send it to us by post, fax or electronically.

In the case of written complaints, we will send a justified response within 30 calendar days of receipt of the complaint.

## **3.3. Complaints management procedure:**

Central complaints management operates in Sense/Net, where user complaints are handled by our staff in a professional and centralized manner. We keep electronic records of user complaints submitted.

Insofar as a complaint submitted at our office or over the telephone cannot be remedied immediately, or if you do not agree with the proposed remedy, or if you submit a complaint to us in writing, the complaint will be investigated and addressed through the centralized complaints management. We seek to investigate complaints and find a reassuring solution to them as soon as possible, and make every possible effort to this end.

If you do not send your written complaint to the complaints management organizational unit specified in the complaints handling policy, or if you submit a written complaint at our office to a staff member other than the designated complaints manager, the staff member who learns of the complaint shall promptly forward it to the employee who is in charge of handling complaints. If you make a complaint verbally to a staff member who is not the designated complaints management employee, this person will give you the contact information of the employee who will be handling your complaint.

Within 30 days of the receipt of your complaint, we shall inform you of the results of the investigation of your complaint and of our position in this regards (with justification). This shall be sent electronically in the case of complaints submitted electronically, or by post in all other cases.

Insofar as we require more information in order to investigate the complaint, we will promptly contact you for this purpose.

We keep all records of complaints received and their responses for three years, and disclose these records to the inspection authorities if requested.

#### **4. For purposes of handling complaints, Barion Payment Inc. may request the following data:**

- a) your name;
- b) contract number, user number;
- c) home address, business address, postal address;
- d) telephone number;
- e) method of notification;
- f) product or service concerned by the complaint;
- g) description of and reason for the complaint;
- h) request of the complainant;
- i) copy of documents needed to substantiate the complaint;
- j) if acting through a proxy, a copy of a valid power of attorney;
- k) other data that may be required to investigate and address the complaint.

We process all data in compliance with the provisions of Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information.

#### **5. Obligation to provide information in connection with complaints management:**

##### **Remedies and other forums for complaints management:**

Our primary aim is to find a reassuring solution to all complaints. Accordingly, if you are not satisfied with the way in which we handle, investigate and respond to your complaint, or find it inadequate, please report this as well to our centralized complaint management service.

Of course in this case, or if your complaint is rejected, or if your complaint has gone unanswered within the statutory 30-day response period, other legal

options are also open to you. You may apply to the following organizations and authorities:

- Hungarian National Bank – H-1013 Budapest, Krisztina krt. 39. Mailing address: H-1534 Budapest BKKP Postafiók: 777, telephone: +36 (1) 489-9100, email: [ugyfelszolgalat@mnbb.hu](mailto:ugyfelszolgalat@mnbb.hu)
- In the event of disputes in connection with the signature of contracts, their term, validity and termination, or with breach of contract and legal consequences thereof:
  - Hungarian Financial Arbitration Board – H-1013 Budapest, Krisztina krt. 39. Mailing address: H-1525 Budapest BKKP, Postafiók: 172, telephone: +36 (1) 489-9100, email: [pbt@mnbb.hu](mailto:pbt@mnbb.hu)

Please note that a decision by the Hungarian Financial Arbitration Board is merely advisory with regards to our Company insofar as, at the start of proceedings, we state that we do not accept the Board's decision as binding upon us. It may become a decision containing obligations if, at the start of proceedings or when the decision is promulgated, we make a statement to the effect that we recognize the decision of the Arbitration Board as binding upon us.

- Legal proceedings may be instituted with the court having territorial jurisdiction.
- Hungarian Competition Authority (H-1054 Budapest, Alkotmány u. 5., mailing address: H-1245 Budapest 5. Postafiók: 1036.

## 6. Records of complaints:

We keep electronic records of complaints, the results of their investigation, responses given to them, as well as any measures taken to provide a solution.

### Records must contain the following information:

- a description of the complaint, as well as the fact or event giving rise to the complaint,
- date on which the complaint was filed,
- description of measures taken to address or resolve the complaint, or reasons for which it was rejected,
- deadline for performance of rectifying measures and name of the person responsible,
- date on which the complaint was responded to.

### Records must allow for Barion Payment Inc. to:

- classify complaints by topic;
- learn of and identify the facts and events giving rise to complaints;
- investigate whether these facts and events may have an impact on other procedures, products or services;
- initiate proceedings to rectify the facts and events identified;
- summarize recurring or systemic problems and legal risks.

Complaints and responses to them are kept for three years. Our Company's staff member in charge of consumer protection shall ensure that proceedings for handling complaints are implemented in compliance with the law.