COMPLAINTS-HANDLING PROCEDURE

Complaints are filed and handled by the Company <u>free of any fees or charges</u>.

The Complaint shall include:
- For natural persons: full name, date of birth, and contact details;
- For legal persons: entity name, registration number, address, and contact details;
- Date or period of the alleged breach;
- Description of the actions/events giving rise to the Complaint;
- Any supporting documentation;
- Preferred resolution or remedy (if any).

The Complaint must be submitted in English or Czech language.

Complaints are submitted via the following channels:
- Registered mail in paper form to: Na strži 1702/65, Nusle, 140 00 Praha 4, Czech Republic;
- Email: support@smartatlas.io (or other official email listed on the Company website).

Complaints received via above mentioned channels must be addressed to the Company's Complaint Handling Officer responsible for handling the complaints.

The Applicant is responsible for ensuring accuracy of the provided data. The Company will use the contact data provided in the Complaint to deliver responses.

If submitted by a representative, appropriate authorization documents must be attached, including a power of attorney and valid ID copy. The Company reserves the right to verify the documents and request notarization or apostille.

The Company may reject improperly submitted Complaints and will inform the Applicant within 7 business days.

The following types of messages shall NOT be considered as Complaints:
- (a) Complaints concerning the Company's activity which is not regulated under MiCAR or other applicable EU/Czech legislation;
- (b) Complaints concerning activity for which the Company is not responsible;
- (c) Requests for identification of payment or payment remitter/subject depositing funds on the Client's account;
- (d) Requests for mediation of payment return or recipient identification;
- (e) Requests for a copy of proof of transaction;
- (f) Requests for data about payment remitter or payment specification;

(g) Suggestions for adjustment or improvement of the Company's services;

(h) Suggestions for modification of documents issued or proposed by the Company in relation to the service provision.

Complaints may be submitted by existing or former Clients - individuals or legal entities that have established a contractual relationship with the Company for crypto-asset services.

Complaints may also be submitted by <u>potential Clients</u> in the following cases:

(a) If the Company fails to comply with its legal obligations during the pre-contractual phase, such as providing clear, fair, and not misleading information about its services, fees, or risks.

(b) If the Company rejects a potential client without valid reasons or fails to provide an explanation for refusal.

(c) When a potential client encounters unreasonable delays or technical difficulties during the onboarding process.

(d) If the Company engages in discriminatory treatment, such as refusing onboarding based on nationality, gender, or other unlawful grounds.

(e) When the Company provides false, exaggerated, or misleading information about its services, fees, or guarantees in advertising or marketing materials.

(f) If the Company mishandles or fails to protect the personal data of a potential Client during the registration or inquiry process, in violation of data protection regulations like Regulation (EU) 2016/679 (General Data Protection Regulation)

Complaints must adhere to the procedural stipulations outlined in this Procedure, including appropriate complaint channels, and provide essential details such as the complainant's identity, the subject of the complaint, and supporting evidence where applicable.

Repeated (duplicate) complaints on the same issue or those deemed to be baseless, malicious, or submitted in bad faith will not be accepted.

If the same issue was previously investigated and closed, the Company may decline to re-investigate and will inform the Applicant.

Complaints may be submitted in Czech, as the official language of the home Member State, and in English.

The Company will acknowledge receipt of a Complaint and inform the Complainant about whether the Complaint is admissible within 5 business days after its receipt.

The Company strives to resolve Clients' Complaints as efficiently as reasonably possible. The complainant will be notified about the final decision ultimately within 35 business days from the date of receipt of the complaint.

In exceptional cases where the decision cannot be provided within the 35 business days, the Company will inform the Complainant of the reason for the delay and provide a revised timeline. The maximum extended processing time will be 45 business days from the date of receipt of the Complaint. Where necessary, the Complaint Handling Officer may request any additional documents as required by local regulators.

The Company will ensure that its decision addresses all points and aspects of the complaint and provides a clear rationale for the outcome. Decisions will be aligned with previous similar cases unless a justified reason for deviation exists.

Complaint outcomes:
- Full satisfaction of the Applicant's claim;
- Partial satisfaction;
- Rejection.

In cases of partial satisfaction or rejection, the Company will clearly set out the reasoning and contain information on available remedies to enable Clients to pursue further action if they do not agree with the reasons for the decision (e.g., through an ombudsman, or national supervisory authority the Czech Trade Inspection Authority or relevant financial ombudsman or relevant court).

The outcome of the complaint is recorded in a written decision letter (Complaint outcome report), which contains at least the following:
- The nature of the complaint;
- The findings from the investigation;
- The decision taken with a motivation;
- Any follow-up steps for the complainant.

Complaint outcome report will be provided to the Complainant and securely stored in the Complaints Register for record-keeping purposes and sent to the Complainant via their preferred communication channel.

Customer Service Department.
This is a team which is responsible for reporting, assigning, closing and communicating to the Applicant about the Complaint. Available 5 days a week during business hours 9 am- 18 pm.

Standard Complaint Form

SUBMISSION OF COMPLAINT

1.a Complainant's personal data:

SURNAME/NAME OF LEGAL ENTITY	NAME	REGISTRATION NUMBER AND LEI (IF ANY)

ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POSTAL CODE	CITY	COUNTRY

TELEPHONE	E-MAIL	

1.b Contact data (if different from the data specified in point 1.a):

SURNAME/NAME OF LEGAL ENTITY	NAME

ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POSTAL CODE	CITY	COUNTRY

TELEPHONE	E-MAIL	

2.a Personal data of the legal representative (if applicable) (power of attorney or other official document proving the appointment of the representative):

LAST NAME	NAME/NAME OF LEGAL ENTITY	REGISTRATION NUMBER AND LEI (IF ANY)

ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POSTAL CODE	CITY	COUNTRY

TELEPHONE		E-MAIL	

2.b Contact data (if different from the data specified in point 2.a):

SURNAME/NAME OF LEGAL ENTITY	NAME

ADDRESS: STREET, HOUSE NUMBER, FLOOR (registered office of companies)	POSTAL CODE	CITY	COUNTRY

TELEPHONE		E-MAIL	

3. Information about the complaint

3.a Full reference to the […]

3.b Description of the subject of the complaint (clearly indicate the subject of the complaint)

Please provide supporting documents for said facts.

3.c Date(s) of the facts for which the complaint was filed

3.d Description of the damage or loss caused (when applicable)

3.e Other comments or important information (when applicable)

	(place)		*(date)*

SIGNATURE	5

COMPLAINT/LEGAL REPRESENTATIVE

Submitted documents (check the appropriate box):

	Power of attorney or other relevant document...	
	A copy of the contract documents of the investment in respect of which the complaint was filed...	
	Other documents supporting the complaint:	