

Allegato 4 – Description of the procedure for handling complaints

What is a complaint?

A complaint is a written or electronic communication expressing dissatisfaction that a Cryptosmart S.p.A. customer sends in relation to the services received. It may concern issues such as the execution of transactions, custody, or the transfer of crypto-assets.

Common complaints may include errors in the execution of transactions, incorrect charges, delays, or service malfunctions.

Who can file a complaint?

Any individual or legal entity that uses Cryptosmart's services and believes that their rights have not been satisfied or that they have encountered poor service can file a complaint.

How to file a complaint?

Complaints must be sent in writing, in Italian, through one of the following channels:

- Registered letter to the address: via Bruno Simonucci, n. 18, 06135 – Perugia (PG);
- Certified email: cryptosmart@pec.it, for the attention of the Complaints Manager;
- Ordinary email: reclami@cryptosmart.it, for the attention of the Complaints Manager.

Customers are also informed that the submission and handling of complaints is free of charge, except for the costs normally associated with the chosen means of communication (e.g., postal service costs). Customers may also use the standard complaint form published on the Company's website.

Content of the complaint

To submit a complaint, please include the following information:

- First name, last name, or name of the customer;
- EUID or national registration number;
- Address, city, country of residence, telephone number, and email address;
- Service to which the complaint relates;
- Clear and detailed description of the subject of the complaint;
- Date or period of the disputed events;
- Measures that the customer would like to see taken.

What happens after the complaint is submitted?

Within 5 business days of receipt of the complaint, the Complaints Manager will confirm receipt of the complaint and inform the customer about how it will be handled. On this occasion, the customer will be informed of: the identity and contact details of the Complaints Manager or the person in charge of handling the complaint; the date of receipt of the complaint; the applicable timeframes for handling, including the deadline for any request for additional information, for the examination of the complaint, and for the communication of the final decision.

If the complaint is admissible, a detailed assessment will be initiated. If it is not, the customer will be informed of the reasons why it cannot be processed.

Outcome of the complaint

The complaint will be examined with the utmost seriousness. The Company shall respond to complaints within the timeframe communicated to the customer upon acknowledgment of receipt and, in any case, no later than 2 (two) months from the date of receipt of the complaint. If accepted, the Company will indicate the corrective actions taken and the time frame for implementation. If rejected or partially accepted, the customer will receive a clear and comprehensive explanation of the reasons. In addition, the Company will provide information on possible alternative solutions to resolve the dispute.

Alternative dispute resolution (ADR)

If the customer is not satisfied with the response received, they may use alternative dispute resolution mechanisms. These procedures are faster and cheaper than traditional legal channels, but the customer always retains the right to take legal action.

How does Cryptosmart guarantee quality in complaint handling?

The Company is committed to handling every complaint in a fair, transparent, and timely manner. The staff involved in handling complaints is constantly trained and updated on applicable regulations to ensure a compliant and professional service.

Contacts for further information

For questions about the handling of a complaint or the status of a complaint already submitted, customers can contact the Complaints Manager through the official channels indicated above.

Recording and retention of complaints

The Company records and retains all complaints received and the measures taken in response through a secure electronic system, which allows for easy retrieval of content and ensures full traceability of the decision-making process followed for each complaint.