COMPLAINTS

Complaints Policy

Effective: 1 February 2026 · Version 1.0

> We take complaints seriously. If you are not satisfied with our service, this policy explains how to raise a complaint, what to expect from us, and how to escalate if you remain dissatisfied.

1. How to Submit a Complaint

You may submit a complaint using any of the following channels:

Email

complaints@hansepay.com

Post

Atrya Technologies SIA

c/o Factory Works GmbH

Stadtdeich 2–4

20097 Hamburg, Germany

When submitting your complaint, please include:

- Your full name and account reference (if applicable)
- A clear description of the issue and what outcome you are seeking
- The date(s) of the relevant transaction(s) or events
- Any supporting documents (screenshots, payment confirmations, correspondence)

2. Our Complaints Process

Step 1 — Acknowledgement (within 3 business days)
We will acknowledge receipt of your complaint within 3 business days and provide you with a reference number and the name of the person handling your case.

Step 2 — Investigation (within 15 business days)
We will investigate your complaint thoroughly and provide a full written response within **15 business days** of receipt. In complex cases, we may require up to 35 business days — we will notify you if this is necessary and explain the reason for the delay.

Step 3 — Final Response
Our final response will either uphold your complaint (and explain what remedial action we will take) or explain why we do not believe the complaint can be upheld, including your right to escalate.

3. Escalation — Financial Supervisor

If you remain dissatisfied after receiving our final response, or if we have not responded within 35 business days, you may escalate your complaint to our regulatory supervisor:

Latvijas Banka (Bank of Latvia) — Consumer Rights Protection
K. Valdemāra iela 2A, Rīga, LV-1050, Latvia
Phone: +371 67 022 300
www.bank.lv/en/consumers

4. EU Online Dispute Resolution

The European Commission's Online Dispute Resolution (ODR) platform was discontinued on 20 July 2025 and is no longer available. Consumers should instead use the national alternative dispute resolution (ADR) routes described in this policy.

5. Out-of-Court Dispute Resolution (Germany)

Customers in Germany may be able to refer a payment-services dispute to the statutory arbitration body at the Deutsche Bundesbank (Schlichtungsstelle bei der Deutschen Bundesbank):

Deutsche Bundesbank — Schlichtungsstelle
Postfach 11 12 32, 60047 Frankfurt am Main, Germany
www.bundesbank.de

The competent ADR body depends on our authorisation and any scheme membership. We will confirm the applicable body, and your right to refer the matter to it, in our final response to your complaint.

6. What We Cannot Help With

Some matters fall outside our complaints process:

- Complaints that are the subject of ongoing litigation
- Decisions we are required to make under AML, sanctions, or regulatory law (for example, account restriction or closure ordered by a regulatory authority)
- Complaints about the actions of third parties, such as correspondent banks, beneficiary banks, or card networks, over which we have no control

7. Contact

For any complaints or feedback: complaints@hansepay.com
Atrya Technologies SIA, trading as HansePay
c/o Factory Works GmbH, Stadtdeich 2–4, 20097 Hamburg, Germany