



Lightyear Europe AS Complaints Policy

Version 3 – 8th of December 2022

Introduction

Lightyear Europe AS ("**the Firm**") is authorised and regulated as an investment firm by the Estonian Financial Supervision Authority under activity license number 4.1-1/31. The Firm is a company registered in Estonia with company number 16235024 and registered office Volta 1, Tallinn 10412, Estonia.

Providing a high standard of customer service is a priority to the Firm. The Firm welcomes all feedback on its services at all times. If you have become dissatisfied with the services of the Firm please allow the Firm a chance to remedy this. The Firm accepts, investigates and reviews all complaints made to it.

The Firm has implemented effective, fair and transparent procedures for the handling of customer complaints. These procedures are in line with the rules and guidelines set by the Estonian Financial Supervision Authority.

Should you have any concern or issue, in respect of any of the services offered by the Firm, your first action should be to submit a complaint by contacting our team at complaints@golightyear.com.

The complaints handling procedure below sets out the process for the submission of complaints by customers and the Firm's policy for handling such complaints.

What is a 'complaint'?

The Firm defines a complaint as being any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service, an expression of

dissatisfaction with the terms or conditions of the Firm's product or service or conduct of the Firm or a refresh determination, which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

How do you make a complaint?

Complaints may be submitted to the customer support team by emailing complaints@golightyear.com.

To ensure the Firm can respond as quickly as possible please include the following in your complaint communication:

- 1) The date on which the issue arose;
- 2) The affected transaction numbers, if applicable; and
- 3) A clear description of the issue.

Should the Firm's customer support team find it necessary, they may contact you directly in order to obtain further clarifications and/or information regarding the complaint.

Please ensure that all communication to the customer support team does not include offensive language directed to either the Firm or any Firm employee.

Procedure for handling complaints

Investigation

Once a member of staff has received your complaint they shall acknowledge that they have received it and, where necessary, they shall investigate the complaint. When handling a complaint, the Firm shall communicate with you clearly, in plain language that is easy to understand and shall reply to you without undue delay, as well as keeping you properly informed.

The Firm will endeavour to resolve the complaint as soon as is possible, however please note the time frames below.

Time Frames

The Firm will send you a prompt acknowledgement to the email indicated by you as contact address, providing early reassurance that the complaint has been received and is being dealt with, and will include information about the timeline of when the complainant can expect a response. This will happen within **24 hours or the next business day** of receiving the complaint.

The Firm shall, by the end of **15 days** after its receipt of the complaint, send you:

- 1) A final response, being a written response from the Firm which:
 - a. accepts the complaint and, where appropriate, offers redress or remedial action; or
 - b. offers redress or remedial action without accepting the complaint; or
 - c. rejects the complaint and gives reasons for doing so and informs the complainant that if he remains dissatisfied with the Firm's response, he may refer his complaint to the Consumer Protection and Technical Regulatory Authority or the Estonian Financial Supervision Authority;
- 2) or a written response which:
 - a. explains why the Firm is not in a position to make a final response, where it has got to with its investigation; and
 - b. indicates when it expects to be able to provide one; and
 - c. include details of any option for the complainant to address the matter with the Consumer Protection and Technical Regulatory Authority or the Estonian Financial Supervision Authority.

Closing complaints

A complaint will generally be seen to have been finalised when a final response from the Firm is provided to you, which:

- accepts the complaint, and, where appropriate, offers redress; or
- offers redress without accepting the complaint; or
- rejects the complaint and gives reasons for doing so;

and which informs you that, if you remain dissatisfied with the Firm's response, you may refer your complaint to the Consumer Protection and Technical Regulatory Authority and Estonian Financial Supervision Authority.

A complaint is also deemed as closed where the complainant has indicated in writing their acceptance of an earlier response that Customer Support has sent to them.

Authorities for solving complaints

If we are unable to resolve your complaint to your satisfaction and you feel that the answer received from us is not the one you expected from us, you may turn to the following authorities to obtain assistance and explanations:

- The Consumer Protection and Technical Regulatory Authority (at Endla 10a, Tallinn 10142, www.ttja.ee/en).
- Estonian Financial Supervision Authority (at Sakala 4, Tallinn, 15030, www.fi.ee).
- Furthermore, in order to resolve a dispute you may contact the Consumer Disputes Committee operating at the Consumer Protection Board and Technical Regulatory Authority or turn to court.

You can find the self-service for Consumer Disputes Committee at <https://komisjon.ee/et/avalduse-esitamine>. A complaint to EFSA can be submitted here: <https://www.fi.ee/et/tarbijale/millal-poorduda-finantsinspektsiooni-poole/kaebuse-esitamine>.

Customers, who reside in certain countries, can also contact their local consumer dispute resolution bodies or financial ombudsman with their complaints. List of such countries and dispute resolution bodies or financial ombudsmen can be found in Schedule 2 of our Terms of Service, [available here](#).