



INFORMATION ON THE HANDLING OF COMPLAINTS

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Information on the Handling of Complaints of DonauCapital Pure Investment GmbH

1 Introduction

DonauCapital Pure Investment GmbH ("DonauCapital" or "we") aims to design all processes in such a way that clients have a positive user experience and the services provided to clients meet the highest quality standards. However, clients may be dissatisfied for a variety of reasons. In such cases, we want to make it as easy as possible for clients to tell us. This document is intended to serve as a basis for this and to explain to clients how they can complain and how we deal with clients' complaints.

2 Definition

A complaint is any expression of dissatisfaction that a natural person or legal entity (complainant) addresses to us in connection with a service regulated under the WpHG or WpIG. A complaint does not require a specific form, but can be made in writing, electronically or verbally.

3 Filing Complaints

3.1 Formal Requirements and Ways of filing Complaints

There are no formal requirements for filing a complaint. You can submit a complaint e.g. in the following ways:

- in writing by sending a letter to: DonauCapital Pure Investment GmbH, Passauer Str. 5, 94161 Ruderting, Germany
- electronically by sending an email to: compliance@purewallet.app
- by calling our customer service, which you can reach at the following telephone number: 08509 910 955

3.2 Content of Complaints

As we consider any expression of dissatisfaction with the regulated services we provide to be a complaint, there are no minimum requirements that you must meet with regard to the content of a complaint. However, in order for us to be able to process the complaint as efficiently as possible, we recommend that you state your name and describe as precisely as possible the matter that is the cause of your dissatisfaction.

4 Handling of Complaints

When processing complaints, we distinguish between verbal, written and electronic complaints. The processing follows the procedure outlined below. Regardless of the form of the complaint, we will try to process and respond to the complaint as quickly as possible and, as far as possible, in less than 8 weeks.

4.1 Written Complaints

A written complaint shall be deemed to be any complaint within the meaning of the provisions in Clause 2 that is received by DonauCapital in paper form (i.e. in form of a letter).

1. Any written complaint received shall be submitted to the Compliance Officer of DonauCapital.
2. DonauCapital's compliance officer ensures that the receipt of the complaint is properly documented internally and forwards the complaint to the competent employee (e.g. account manager, tied agent) for further immediate processing.
3. The member of staff responsible for handling the complaint will acknowledge receipt of the complaint to the complainant in writing.
4. Written complaints shall always be answered in writing. 5.
5. All response letters shall be signed by the management or the compliance officer.
6. The original letter from the client and a copy of the response letter shall be archived.
7. After conclusion of the complaint procedure, a settlement note with date shall be added to the internal file created for the case.

4.2 Electronic Complaints

An electronic complaint is deemed to be any complaint within the meaning of the provisions in Clause 2 that is received by DonauCapital by electronic transmission (e.g. by email).

1. The customer service of DonauCapital shall print the complaint.
2. The printed electronic complaint shall be submitted to the Compliance Officer of DonauCapital.

3. The Compliance Officer of DonauCapital shall ensure that the receipt of the complaint is properly documented internally and shall forward the complaint to the competent employee (e.g. account manager, tied agent) for further immediate processing.
4. The Compliance Officer of DonauCapital shall ensure that the receipt of the complaint is properly documented internally and shall forward the complaint to the responsible employee (e.g. account manager, tied agent) for further immediate processing.
5. Electronic complaints shall always be answered electronically.
6. All response emails shall be sent by the management or the Compliance Officer.
7. A printed version of the client's complaint and a printed version of the response email shall be archived.
8. After conclusion of the complaint procedure, a settlement note with date shall be added to the internal file created for the case.

4.3 Verbal Complaints

A verbal complaint is deemed to be any complaint within the meaning of the provisions in Clause 2 that is communicated to DonauCapital in a conversation (in person, on the telephone or in a video call).

1. Verbal complaints shall be forwarded immediately by the employee speaking to the complainant as a telephone note to the Compliance Officer of DonauCapital.
2. The Compliance Officer of DonauCapital shall immediately contact the client by telephone.
3. The Compliance Officer of DonauCapital shall ensure that the receipt of the complaint is properly documented internally and shall forward the complaint to the competent employee (e.g. account manager, contractually bound intermediary) for further immediate processing.
4. The employee responsible for processing the complaint shall confirm receipt of the complaint to the complainant by electronic means.
5. If the client's satisfaction cannot be restored on the phone by the Compliance Officer, subsequent communication shall be by electronic means. A note of the initial telephone call shall be made immediately.
6. the case, including a copy of the telephone note, shall be documented internally.

7. Thereafter, all dealings with the client shall be in electronic form. Verbal complaints that cannot be resolved to the customer's satisfaction in the initial telephone call shall be answered electronically.
8. All response emails shall be sent by the management or the Compliance Officer.
9. A printed version of the client's complaint and a printed version of the response email shall be archived.
10. After conclusion of the complaint procedure, a settlement note with date shall be added to the internal file created for the case.

5 After Conclusion of the Complaint Procedure

If you are not satisfied with the result of the complaint procedure, you are free to present your dissatisfaction to other competent institutions. In addition to the possibility of filing a civil law suit, you have the option of presenting the case to the Bundesanstalt für Finanzdienstleistungsaufsicht (Federal Financial Supervisory Authority) as the competent supervisory authority, or of initiating arbitration proceedings at one of the arbitration boards set up for this purpose.

5.1 Name and Address of the competent Supervisory Authority

The supervisory authority responsible for DonauCapital is the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin). The address of BaFin is:

Bundesanstalt für Finanzdienstleistungsaufsicht
Graurheindorfer Str. 108
53117 Bonn
Germany

5.2 Names, Addresses and Access Requirements of the competent Arbitration Boards

5.2.1 Which Arbitration Board is competent?

In addition to numerous private consumer arbitration boards, there are also two public arbitration boards, namely one at the Deutsche Bundesbank and one at the Bundesanstalt für Finanzdienstleistungsaufsicht (Federal Financial Supervisory Authority). However, the public arbitration boards are only competent to arbitrate your case if there is no competent recognized consumer arbitration board. At the time of preparing this document, DonauCapital is not aware of any recognized consumer arbitration board that is competent to arbitrate a case against

DonauCapital. Therefore, at the time of writing this document, one of the public arbitration boards is competent.

Which of the two public arbitration boards is competent in your specific case is determined by Section 14 (1) of the Act on Injunctions for Consumer Rights and Other Violations (Injunctions Act – UKlaG).

According to this law, the arbitration board at the Deutsche Bundesbank is responsible if your case specifically concerns the provisions of the German Civil Code that regulate distance contracts for financial services. The conciliation body established at the Bundesanstalt für Finanzdienstleistungsaufsicht (Federal Financial Supervisory Authority) is responsible for settling disputes with DonauCapital in all other cases.

5.2.2 Names and Addresses of the competent Arbitration Boards

Depending on the subject matter of your case, either the arbitration board at the Deutsche Bundesbank or the arbitration board established at the Bundesanstalt für Finanzdienstleistungsaufsicht (Federal Financial Supervisory Authority) is responsible (see above under section 5.2.1).

The contact details of the arbitration board at the Deutsche Bundesbank are:

Schlichtungsstelle bei der Deutschen Bundesbank
Wilhelm-Epstein-Straße 14
60431 Frankfurt am Main
Germany

PO Box 10 06 02
60006 Frankfurt am Main
Germany

Telephone: +49 69 9566-3232
Telefax: +49 69 709090-9901
Email: schlichtung@bundesbank.de

The contact details of the arbitration board at the Federal Financial Supervisory Authority are:

Schlichtungsstelle bei der Bundesanstalt für Finanzdienstleistungsaufsicht
Referat ZR 3
Graurheindorfer Straße 108
D-53117 Bonn
Germany

Telephone: 0228 / 4108-0
Telefax: 0228 / 4108-62299
Email: schlichtungsstelle@bafin.de

5.2.3 Access requirements for the arbitration proceedings

The arbitration proceedings of the arbitration board at the Deutsche Bundesbank and of the arbitration board at the Bundesanstalt für Finanzdienstleistungsaufsicht (Federal Financial Supervisory Authority) are subject to the following access requirements:

The arbitration boards at the Deutsche Bundesbank and at the Bundesanstalt für Finanzdienstleistungsaufsicht are only competent if there is no recognized private consumer arbitration board for the dispute. The arbitration boards indicated above will refuse to conduct arbitration proceedings if

1. no sufficient motion has been filed,
2. the dispute does not fall within the jurisdiction of the arbitration board and the motion is not to be submitted to a competent consumer arbitration board,
3. arbitration proceedings have already been conducted or are pending before a consumer arbitration board in respect of the same dispute,
4. in the case of a dispute concerning the right to conclude a basic account agreement under the Payment Accounts Act, administrative proceedings pursuant to sections 48 to 50 of the Payment Accounts Act to enforce the claim are already pending or a final decision on the claim has been made in such proceedings,

5. an application for legal aid in respect of the dispute has been rejected because the intended legal action did not offer sufficient prospects of success or appeared to be wilful,
6. the dispute is already pending before a court or a court has ruled on the dispute by way of a judgment on the merits,
7. the dispute has been settled by compromise or in some other way; or
8. the claim which is the subject of the dispute is time-barred and the defendant has raised the defence of limitation.

Furthermore, the conduct of arbitration proceedings may be refused if a fundamental question of law relevant to the arbitration of the dispute has not been clarified or facts that are decisive for the content of an arbitration proposal remain in dispute because the facts cannot be clarified by the arbitration board.

The motion to conduct arbitration proceedings, statements, supporting documents and other communications shall be submitted to the office of the arbitration board in text form (e.g. letter, e-mail, fax). In doing so, the applicant shall affirm that the reasons for refusal mentioned above under numbers 3 to 7 do not exist.

The language of the proceedings shall be German. The parties may be represented in the proceedings. In the case of disputes arising from contracts concluded via a website or by other electronic means (online contracts), the request may also be submitted via the European platform for online dispute resolution (<http://ec.europa.eu/odr>).

The arbitration proceedings are free of charge for consumers. Expenses (e.g. lawyer's fees, postage and telephone costs) are not reimbursed.



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