

Complaint Handling

pure●

Information on the Handling of Complaints of DonauCapital Pure Investment GmbH

1 Introduction

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

To make things easier for you, we provide you with a complaint form, which you can find at the end of this document. Using that form is not a prerequisite for filing a complaint, though.

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

We handle complaints in close cooperation with the other companies offering their services in the Pure App. Any complaint is initially handled by Pure Wallet UAB. If a complaint involves our services, Pure Wallet UAB will forward it to our Compliance Officer, who will work with Pure Wallet UAB to handle it.

4.1 Complaints procedure irrespective of the way of reception

The procedure which shall be followed by Pure, when handling clients' complaints received in any form, is the following:

- 1) A complaint is initially handled by a member of the Back Office/Client Support Department of Pure Wallet UAB. The employee receiving the complaint or grievance shall take the necessary actions so that the complaint or grievance is properly addressed;
- 2) The complaint in the form in which it has been received should immediately (within three working days) be forwarded to the head of the department where the complaint is addressed and to the company's compliance officer;
- 3) The member of the Back Office/Client Support Department shall send a written acknowledgement letter informing the complainant that the complaint is under investigation and has been forwarded to the relevant department/personnel, providing all details so that the complainant is aware who is dealing with his/her complaint. Along with the letter, the Company's Handling of Clients' Complaints Policy shall be provided to the complainant;
- 4) The member of staff, in addition to the above, should make all best efforts to ensure that in the case of the complaint being of such nature that can be resolved immediately, to do so that the client will not have to pursue the filing of a formal complaint.

The Company sets 5 business days from the day the original complaint is received as a standard investigation period. If the investigation is complete in less than 10 business days, the complainant will be informed about the results of the investigation immediately upon its completion. However, if a complaint is not resolved within the standard investigation period, the Company will inform the complainant in detail

about the causes of delay, a status of the investigation process and an expected date of completion of the investigation.

4.2 Complaints procedure in case of written complaints and electronic complaints

- 1) When a written complaint or an electronic complaint (i.e. a complaint via email) is received, this shall be forwarded to the relevant department which is the most appropriate for dealing with the complaint. Furthermore, the complaint shall be forwarded to the company's compliance officer.
- 2) As soon as the Complaint is submitted, the Compliance Office registers the Complaint to the internal register where each client has a unique reference number.
- 3) The Compliance Officer shall then inform the complainant that the complaint has been received and it is under investigation as well as disclose the unique reference number.
- 4) Upon receiving a written complaint, the following details should be obtained and recorded:
 - a) The identification particulars of any client having made a complaint;
 - b) The service provided by the Company and related to the complaint;
 - c) The employee responsible for the provision of those services;
 - d) The department where the employee belongs;
 - e) Date of receipt and registration of complaint;
 - f) Content of the complaint;
 - g) The magnitude of the damage claimed by the client.

Reference of any correspondence exchanged between the Company and the client:

- 1) The events leading to the complaint should be examined and assessed based on the information provided by the client.
- 2) The facts as stated by the client have been examined and verified whether any additional information needs to be retrieved from the Company's archive (electronic mail, recorded telephone calls, IT data, etc.).
- 3) All non-trivial complaints or grievances shall be brought to the attention of and their resolution should be approved by the Senior Management.
- 4) Upon completion, of the investigation a report shall be prepared stating the facts and brought to management's attention, which will decide on the formal response to the client and the action to be taken.

- 5) Upon investigation completion, the member of the Compliance Department shall inform the complainant in writing, using a plain language which is clearly understood, about results of the investigation and actions taken to satisfy the complainant's demand(s) without any unnecessary delay.

If the provided investigation results do not fully satisfy the complainant's demands, the Company should provide to the complainant in writing a thorough explanation of its position on the complaint and set out the complainant's option to maintain the complaint to any other authority or body which regulates or supervise the relation of the 2 parties.

We generally reply within two months about the outcome of the complaint. In the event that we are unable to respond within two months, we will inform the complainant of the reasons for the delay and indicate the period of time within which it is possible to complete the investigation. This period of time will not exceed three months from the submission of the complaint.

5 After completion of the complaint procedure

If you are not satisfied with the outcome of the complaint procedure, you are free to refer your dissatisfaction to the relevant authorities. You have the option of describing the case to the Federal Financial Supervisory Authority (BaFin) as the competent supervisory authority or initiating arbitration proceedings with one of the competent arbitration bodies. You also have the option of initiating civil legal action against us.

5.1 Name and Address of the competent Supervisory Authority

The supervisory authority responsible for Pure 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?

Depending on the reason why you wish to initiate arbitration proceedings against Pure, either the arbitration board set up at the Deutsche Bundesbank or the Federal Universal Arbitration Board (Universalschlichtungsstelle des Bundes) is competent.

The arbitration board at the Deutsche Bundesbank is the right place to go if your case specifically concerns the provisions of the German Civil Code (Bürgerliches Gesetzbuch) governing distance contracts for financial services. The Federal Universal Arbitration Board (Universalschlichtungsstelle des Bundes) is the right place to go for all other arbitrations with Pure.

However, the above-mentioned arbitration boards are only competent to arbitrate your case if there is no competent recognised consumer arbitration board. At the time of preparing this document, Pure is not aware of any recognised consumer arbitration board that is competent to arbitrate a case against Pure.

5.2.2 Contact details of the Arbitration Board at the Deutsche Bundesbank and access requirements of the arbitration proceedings

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
P.O. Box 10 06 02
60006 Frankfurt am Main
Phone: +49 69 9566-33232
Email: schlichtung@bundesbank.de
Homepage: www.bundesbank.de/schlichtungsantrag

The arbitration board established at the Deutsche Bundesbank is only responsible if there is no recognized private consumer arbitration board for the dispute. The arbitration board will refuse to conduct arbitration proceedings if

1. an insufficient application has been submitted,

2. the arbitration board is not competent for the dispute and the application is not to be submitted to the responsible consumer arbitration board or another dispute resolution body,
3. arbitration proceedings have already been conducted or are pending before a consumer arbitration board for the same dispute,
4. in the case of disputes concerning the right to conclude a basic account agreement under the German Payment Accounts Act (Zahlungskontengesetz), administrative proceedings under Sections 48 to 50 of the German Payment Accounts Act (Zahlungskontengesetz) to enforce the claim are already pending or a final decision on the claim has been made in such proceedings,
5. an application for the granting of legal aid (i.e. help with financing legal costs) has been rejected because the intended legal action did not offer sufficient prospects of success or appeared frivolous,
6. the dispute is already pending before a court or a court has already ruled on the dispute in a final judgment,
7. the claims or legal relationships that are the subject of the dispute have been registered as a class action in the class action register and the action is still pending,
8. the dispute has been settled by agreement or in any other way, or
9. the claim that is the subject of the dispute is time-barred and the respondent has raised the statute of limitations as a defense.

The initiation of arbitration proceedings may also be refused if a fundamental legal issue that is relevant to the conciliation of the dispute has not been resolved or if facts that are decisive for the content of a settlement proposal remain disputed because the facts of the case cannot be clarified by the arbitration board.

The request for arbitration proceedings, statements, supporting documents, and other communications must be submitted to the office in writing (e.g., by letter or email).

The applicant must confirm that none of the grounds for rejection listed in points 3 to 8 above apply.

The language of the proceedings is German. The parties may be represented by legal counsel in the proceedings.

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

5.2.3 Contact details of the Federal Universal Arbitration Board (Universalschlichtungsstelle des Bundes) and access requirements of the arbitration proceedings

The contact details for the Federal Universal Arbitration Board (Universalschlichtungsstelle des Bundes) are:

Universalschlichtungsstelle des Bundes
Zentrums für Schlichtung e.V.
Straßburger Straße 8
77694 Kehl am Rhein
Email: mail@universalschlichtungsstelle.de.
Homepage: <https://www.universalschlichtungsstelle.de>

The Federal Universal Arbitration Board (Universalschlichtungsstelle des Bundes) is only competent if there is no recognized private consumer arbitration board for the dispute. The arbitration board will refuse to conduct arbitration proceedings if

1. the dispute does not fall within the jurisdiction of the arbitration board,
2. the disputed claim has not previously been asserted against the respondent,
3. the application is obviously without prospect of success or appears to be frivolous, in particular because
 - a. the disputed claim was already time-barred at the time the application was filed and the company invokes the statute of limitations,
 - b. the dispute has already been settled,
 - c. an application for legal aid (i.e. help with financing legal costs) in respect of the dispute has already been rejected on the grounds that the intended legal action has no reasonable prospect of success or appears frivolous,
4. a consumer arbitration board has already conducted proceedings to settle the dispute,
5. the dispute is pending before another consumer arbitration board,
6. a court has already made a decision on the merits of the dispute or the dispute is pending before a court, unless the court orders the proceedings to be

suspended in accordance with Section 278a (2) of the Code of Civil Procedure with regard to the proceedings before the consumer arbitration board,

7. the amount in dispute is less than EUR 10.00 or exceeds EUR 50,000.00, or
8. the handling of the dispute would seriously impair the effective operation of the arbitration board, in particular because
 - a. the arbitration board can only clarify the facts or legal issues with unreasonable effort,
 - b. a fundamental legal question that is relevant to the assessment of the dispute has not been resolved.

For consumers, the procedure is free of charge, apart from a possible abuse fee. Expenses will not be reimbursed. If a party is assisted by a representative in the proceedings, it shall bear the costs of its representative itself.

DonauCapital Pure Investment GmbH

COMPLAINT FORM

No. of the Form (to be filled out by us):

Client's Name:

Account Number:

Address:

Email:

Description:

Date: _____

Signature: _____

Please enclose any evidence and relevant documentation.

Submit the form to complaints@purewallet.app