



Complaints, ABF and Dispute Resolution

At Swiperest, reports, complaints, and requests for clarification are handled with the utmost care, with the aim of ensuring transparent communication and timely feedback. Each communication is processed in accordance with a structured procedure, in order to properly reconstruct the facts and provide a reasoned response consistent with the verifications carried out and with the regulations applicable to the services provided.

Article 1 - Organization and Resources Dedicated to Complaint Handling

Complaint management is entrusted to the Complaints Office, composed of **two dedicated resources** with the following roles:

- **Head of the Complaints Office (Compliance/Legal Officer):** coordinates the complaint handling process, supervises the investigation phase, ensures compliance with applicable regulations, and manages relations with Treezor and the competent Authorities.
- **Complaints Handling Officer (Customer Support/Operations Officer):** operationally manages complaints, oversees the intake of reports, collects the necessary documentation, updates the ticketing system, and supports the investigation phase.

The Complaints Office is responsible for monitoring the entire complaint handling process, maintaining proper record keeping, and preparing complaint statistics to be submitted to Treezor and, through it, to the relevant Regulator.

Article 2 - How to Submit a Complaint

A complaint may be submitted through one of the following channels:

- **By email:** reclami@swiperest.com
- **By post:** Swipe srl – Via Sclafani 40/B Acireale, 95024 - CT



In order for the request to be handled effectively, it is important that the complaint includes all informations useful for its assessment. In particular, the following details are required:

- **First and last name** (and, where applicable, **company name** and role of the contact person);
- **Contact details** to receive a response (email and/or telephone number);
- **A clear and detailed description** of the reason for the complaint, including **date(s)**, circumstances, and references to the event;
- Information enabling identification of the relevant transaction or service (e.g., transaction ID, amount, channel, and any merchant involved);
- Any supporting **documentation** (screenshot, receipts, communications, statement, etc.)

Where information is incomplete, additional details or documents may be requested solely for the purpose of conducting accurate checks and reducing processing times.

Where possible, priority is given to a prompt and solution-oriented handling of complaints, while maintaining clear communication throughout the process.

If the complaint specifically concerns payment **services and/or electronic money services** provided through **Treezor**, it may be necessary to involve such entity for technical and regulatory checks (for example, regarding payment instructions, outcomes, reversals, disputes, or operational records). In any case, updates on the status of the complaint will be provided and, upon completion of the investigation, the outcome will be communicated together with the relevant reasons.

Article 3 - Acknowledgment and Response Times

Once the complaint has been received, Swiperest proceeds with its acknowledgment and initiates the necessary internal checks. Depending on the specific case, the investigation may include analysis of the documentation provided, operational logs, authorization flows, and communications exchanged, as well as any necessary checks with Treezor where the matter falls within the scope of regulated services.



A response is provided within **15 days** from receipt of the complaint. If further investigation or additional documentation is required, the status of the case and any updated timeline will be communicated, specifying the reasons for the extension and the activities in progress.

The objective remains to provide a complete clarification and a clear outcome, avoiding generic responses and ensuring full traceability of the handling process.

Article 4 - Referral to the Banking and Financial Ombudsman (ABF)

If the response provided is deemed unsatisfactory, or if no response is received within **15 days**, it is possible to refer the matter to the Banking and Financial Ombudsman (**Arbitro Bancario Finanziario – ABF**), in accordance with the applicable conditions. The ABF is an out-of-court dispute resolution mechanism designed to allow customers to assert their rights in a manner that is generally simpler, faster, and less costly than ordinary judicial proceedings.

An appeal to the ABF may be submitted:

- **Only after** a complaint has been filed with Swiperest (or with the competent entity indicated in the response, where handling of the specific case requires involvement of Treezor);
- **Within 12 months** from the date of the response to the complaint, or from the expiry of 60 days without having received a response.

Article 5 - Scope of Disputes That May Be Examined

The ABF may examine disputes relating to **payment services and/or electronic money services**. In general, disputes concerning facts or transactions that are excessively dated (i.e., more than six years old) or complaints not preceded by a prior claim submitted to the competent intermediary cannot be handled.

For information on how to file a claim, applicable costs, required forms, and competent panels, reference may be made to the ABF portal (Bank of Italy).