

## B.02 Complaints policy

### Policy

Version: 2.0

#### Abstract:

This document describes the complaints policy of Intersolve Payments B.V. and the role of the various departments in this regard. The Board of Directors (hereinafter: BoD) has adopted this complaints policy. The policy is implemented through various procedures and measures.



## DOCUMENT DETAILS

Version	2.0
Date of publication	21-02-2025
Status	Final
Document type	Policy and procedure
Classification	Internal
Project ID	Product management - complaints policy
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Distribution	Intersolve Payments B.V.
Organisation	Intersolve Payments B.V. (hereinafter: Payments)

## VERSION HISTORY

Version	Date	Author	Comments
1.9	03-10-2023	Peter Schilder	Periodic review
1.10	31 December 2024	Peter Schilder	Final version approved by Payments management on 15 December 2023.
1.11	20 January 2025	Nadine Heneweer & Alexander Verhoeven	Reviewed by Compliance and Risk department.
2.0	22 February 2025	Peter Schilder	Final version

## APPROVALS

Version	Date	Approver	Comments
1.10	15 December 2023	BoD	First draft
2.0	21 February 2025	BoD	Approved without comments

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## 1. INTRODUCTION

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### 1.1 General

Payments Payments B.V. (hereinafter Payments) is an electronic money institution (EMI). Intersolve Payments B.V. (hereinafter referred to as Payments) is a licensed electronic money institution (EMI) that must comply with rules governing supervision by, among others, De Nederlandsche Bank (DNB), the Netherlands Authority for the Financial Markets (AFM) and the Dutch Data Protection Authority. The Financial Supervision Act (Wft) and Payments' internal code of conduct require Payments to treat its customers with integrity and transparency. This includes the timely and correct handling of complaints. In order to conduct its business in a controlled and ethical manner, Payments must, among other things, have policies and procedures in place for reporting complaints.

### 1.2 Purpose

This document describes the complaints policy for financial services (e-money and payment services) offered by Payments to customers, retailers and consumers, and the role of the various departments in this regard. The aim is to comply with the legal requirements as an EMI with regard to complaint handling.

### 1.3 Major changes compared to the previous version

The most important change compared to the previous approved version is the structure of the policy document. This has been revised and brought into line with the structure of other policy documents.

### 1.4 Preconditions

Intersolve Group has a Client Support (CS) department that receives questions, requests and incident reports from clients or stakeholders regarding the services provided by both operating companies. These reports are handled by CS and the client or stakeholder receives feedback. These reports are not considered complaints.

### 1.5 Scope

Intersolve is affiliated with the Financial Services Complaints Institute (Kifid). Payments has chosen to consider the Kifid's ruling as binding.

The complaints policy distinguishes between different types of services. This determines who is primarily responsible for handling complaints and which regulations apply. The scope of this document is limited to complaints concerning the financial services (subject to the Financial Supervision Act) (electronic money services and payment services) of Payments' direct contracting parties. These are the complaints that fall into the category at the bottom right of the table below.

**Classification of complaints:**

	<u>Business partner</u>	<u>Merchant/Company</u>	<u>Consumer</u>
<u>Services provided by Intersolve Technologies (hereinafter: Technologies) that are not subject to the Financial Supervision Act (Wft)</u>	Account management Technologies	Operations Technologies	Not applicable
<u>Services provided by Payments that are not subject to the Financial Supervision Act</u>	Account Management/Sales EGI	The first point of contact for complaints is the Business Partner; Payments is involved at most in the second line (e.g. errors in implementation/activation terminals, etc.)	If applicable, first line handling by the Business Partner itself (which may refer issues to Payments).
<u>Financial Supervision Act-regulated services (electronic money and payment services) provided by Payments</u>	Account Management/Sales EGI	Complaints from merchants/companies that are contracting parties of Payments can be submitted in writing or by e-mail (egi-klachten@intersolve.nl ).	If the consumer is a contracting party of Payments, complaints about services should be submitted via the Intersolve Payments website; if not, the complaint must first be submitted via the business partner. If the complaint persists, Intersolve Payments will handle the complaint .

A complaint is: a formal expression of dissatisfaction about a service provided or treatment experienced by the complainant in contact with our company.

Not every request for information about Intersolve's services is considered a complaint. If, after initial contact (and/or responses), the customer indicates that they are dissatisfied with Intersolve's services, this expression will be treated as a complaint.

## 1.6 Risks

Failure to comply with the legal frameworks underlying this policy entails various risks. These include:

- Damage to the image of Payments and to the image of Payments' customers.
- Dissatisfaction and complaints can lead to the departure of customers/business relations, resulting in a loss of turnover.
- The imposition of sanctions on Payments by supervisory authorities such as DNB, including instructions, orders subject to a penalty or fines.

## 1.7 Relevant legislation, regulations and guidelines

### 1.7.1 European legislation and regulations

- Guidelines from the European supervisory authorities European Securities and Markets Authority and European Banking Authority (see appendix)

### 1.7.2 National legislation

- Financial Supervision Act (Wft, including Articles 4:17 and 4:71h Wft)
- General Data Protection Regulation: External link: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing External link: Directive 95/46/EC (OJEU 2016, 119);

### 1.7.3 Other relevant lower-level regulations & guidelines

- Policy rules, Q&A and guidelines of De Nederlandsche Bank (including DNB SIRA good practice)
- Website of DNB and AFM
- KIFID website
- Ruler and LexisNexis (paid media sources)

Updates to the aforementioned sources are monitored and, where necessary, the complaints policy is amended if elements relevant to Payments are added and/or changed.

## 1.8 Definitions

Term	Definition
AFM	the Netherlands Authority for the Financial Markets
Business partner	Any party that purchases B2B services and/or collaborates with Payments (e.g. a programme manager/brand owner).
DNB	De Nederlandsche Bank
KIFID	Financial Services Complaints Institute
AP	The Dutch Data Protection Authority
Complaint	A complaint is an expression of dissatisfaction with a proven service, a person or a product. It may concern the behaviour of an employee, the quality of service or an individual issue.



	that affects someone. Complaints may relate to purchased products or services that do not meet expectations or needs.

## 1.9 Governance

The Board of Directors (hereinafter: BoD) of Payments establishes this complaints policy, approves (or mandates) the handling of complaints and acts as an escalation level for complaints that, in the customer's view, have not been adequately resolved. The BoD assesses the information that emerges from complaints and decides on any improvement measures to be taken as a result.

The CFO and the Head of Compliance & Risk are responsible for formulating, updating and assessing the effectiveness and proper functioning of this policy. Desired improvements or adjustments are proposed to the BoD of Intersolve Payments.

The BoD of Payments is responsible for implementing and monitoring this procedure. As the owner, the CFO is responsible for keeping this procedure up to date. The procedure is coordinated with the business, the Compliance & Risk department, and the BoD. The procedure is reviewed at least once a year or after substantial changes by the Head of Compliance & Risk and submitted to the BoD for approval.

Updates to the aforementioned legislation and regulations (including guidelines and Q&As from supervisory authorities) are monitored via Ruler, RSS functions (alerts) and newsletters from supervisory authorities, and the procedure is amended where necessary.

At least once a year, Finance reviews complaints, problems and the implementation of the procedure. The results are shared with the BoD and the Head of Compliance & Risk.

## 1.10 Interfaces with other relevant policies and procedures

This policy mainly overlaps with the following documents within Payments:

- Code of Conduct
- Whistleblower policy
- Integrity policy
- Incident Management Policy
- B.07 Internal complaints procedure v1.2 final.pdf

## 2. COMPLAINTS HANDLING PROCESS

The policy is implemented in various processes. Complaints may originate internally or externally and are handled by CS and/or Finance. See the Internal complaints procedure for internal handling. For external complaints, please refer to the external complaints handling process. Reports made by a whistleblower are

handled via the Whistleblower Policy. Supervisory incidents are handled in accordance with the Incident Management Policy and incident process.

The aim is to handle all internal and external complaints within 14 working days (exceptionally longer, with a maximum of 20 working days). The implementation, monitoring and reporting of the procedures is the responsibility of the Finance department, which periodically informs the Compliance & Risk department. An internal or external complaint is always reported to the Management Board.

Payments maintains a register in which all complaints are recorded.

## 2.1 Communication complaints policy Intersolve

Intersolve's complaints policy, as stated on the Payments website, is as follows:

### Interne klachtenprocedure Intersolve

Intersolve doet er alles aan haar dienstverlening zo goed mogelijk te laten verlopen. Voor die gevallen waarin er toch iets misgaat, heeft Intersolve voor consumenten een interne klachtenprocedure. De klachtenprocedure geldt voor klachten over de wijze waarop Intersolve elektronisch geld uitgeeft en het gebruiken van elektronisch geld bij het doen van aankopen.

#### Hoe dien je een klacht in?

Klachten kun je indienen bij de directie van Intersolve. Naast de omschrijving van je klacht dien je je naam, adres, woonplaats en telefoonnummer te vermelden. Daarnaast dien je het merk van het elektronisch geld waarover de klacht gaat te vermelden en indien van toepassing het betreffende kaartnummer en de datum van de transactie waarop de klacht betrekking heeft.

##### Online indienen:

Klachtenformulier: [Klantenservice](#)  
Via e-mail: [klachten@intersolve.nl](mailto:klachten@intersolve.nl)

##### Per post:

Intersolve Payments B.V.  
o.v.v. klachten  
t.a.v. de Directie  
Postbus 66  
3930 EB Woudenberg

#### Binnen 5 werkdagen

Ons doel is om je klacht binnen vijf werkdagen af te handelen en we zullen je berichten wanneer die termijn langer wordt. In sommige situaties zullen we extra onderzoek moeten doen en meer tijd nodig hebben. In dat geval geven we uiterlijk 20 werkdagen na je klacht uitsluitsel.

Als de klacht onverhoop niet naar tevredenheid wordt opgelost, kun je terecht bij Het Financiële Klachteninstituut KIFID. Dat kan zodra Intersolve je heeft geïnformeerd over haar definitieve standpunt over de klacht. Op de website van het [Kifid](#) vind je een klachtenformulier en nadere aanwijzingen. Uiteraard staat het je ook vrij om de zaak voor te leggen aan de bevoegde Nederlandse rechter.

The process and timelines are as follows:

- Immediately after receipt, the customer automatically receives confirmation of receipt of the complaint and an explanation of the follow-up and timelines. The aim is to handle complaints within five working days. If this is not possible, the customer will be informed of the timeframe within which Intersolve expects to have handled the complaint

resolved.

- Within 5 working days, the internal investigation into the complaint will be completed, management will approve the settlement and the customer will be informed of either the settlement or the timelines required to further investigate the complaint.
- Within the new timelines, but no later than 20 working days, the customer will receive final notification of the resolution.
- If the customer is not satisfied with the resolution, the steps the customer can take to appeal will be indicated.
- As soon as a complaint is received, it is recorded in the complaints register. Once the complaint has been resolved, this status is also added to the complaints register.

The complaint handling is recorded in such a way that the timelines are followed and the nature of the complaints can be analysed. If the customer is not satisfied with the resolution of the complaint, they will be advised to submit the complaint to Kifid. Intersolve considers the Kifid ruling to be binding and will implement the decision of the disputes committee in accordance with Kifid regulations.

## 2.2 Organisational embedding of complaint handling

The Management Board of Intersolve Payments establishes the complaints policy and approves the handling of complaints based on the advice of the internal complaints assessor. The implementation, monitoring and reporting of the procedures that together constitute the complaints policy are the responsibility of the Finance department. All accepted complaints are reported to the BoD and are also recorded in a complaints register.

## 3. MONITORING AND CONTINUING EDUCATION

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The effectiveness of the control measures (CMs) is periodically assessed by both the first and second lines. Based on these assessments, line management is able to intervene (make adjustments) to improve the effectiveness of the CMs. This prevents errors from being repeated or gaps (shortcomings) in the risk management system from persisting. This contributes to the organisation's learning ability and the continuous improvement of the risk management system and the quality of Payments' processes.

### 3.1 First-line monitoring

The first line carries out monitoring via:

1. ISAE 3402 monitoring activities on the BHM's that fall within the scope of the ISAE 3402 statement;
2. ISO 27001 monitoring activities on the BHM's that fall within the scope of the ISO 27001 certification;
3. AO/IC monitoring activities on the BHM that do not fall under 1 and 2.

The results of the monitoring activities for Payments are incorporated into a periodic report to the BoD. Where applicable, this report indicates where deficiencies in internal control occur and how these can be remedied. When this is done

If there is reason to do so, the design or implementation of BHM's can be reassessed by the responsible line manager and adjusted where necessary.

### 3.2 Second-line monitoring

After the monitoring has been carried out by the first line, the second line performs a test on the quality of the monitoring by the first line. Has the monitoring been carried out properly and have the results been interpreted correctly? The second line bases its assessment on the work carried out by:

- the auditor who issues the ISAE 3402 statement;
- the certifying auditor who issues the ISO 27001 certificate.

This means that the second line primarily focuses on testing the monitoring activities on the BHM's that do not fall under 1 and 2. This is done on a risk-based basis using random samples. The results of the testing activities are included in the second line's quarterly report (separate Risk and Compliance reports) to the BoD.

### 3.3 Third-line monitoring

The internal auditor will assess compliance with the laws and regulations governing the reporting of incidents in accordance with her work programme. She will report her final findings to the Payments BoD, the Head of Compliance and Risk, and the Supervisory Board. The external auditor will also assess the design, existence, and operation of the system as part of her audit assignments.

### 3.4 Continuing education

Payments allocates a fixed percentage of its total personnel costs each year to training and education. An annual assessment is carried out to determine whether this allocation is sufficient to provide employees with adequate training. In addition to spending on external training courses, Payments pays a great deal of attention to knowledge sharing within the organisation. In this context, C&R draws up an annual training plan for C&R-related topics. Training in the area of controlled and ethical business operations forms a large part of this. The training plan is approved by the BoD. If necessary, training on handling complaints will be included in the training plan or individual agreements will be made with employees to follow training.

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## 4. REPORTING

Reporting is the responsibility of the Finance department, which periodically informs the BoD and the Compliance & Risk department. Finance reports on a quarterly basis.

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## 5. PUBLICATION

A channel called "Policy and Processes" has been created in the Teams environment "Intersolve Payments", which is accessible to all employees of the relevant entity. All approved policy documents and procedures are published in PDF format in this channel. Employees of

the other entity can also access this channel if this is necessary for the performance of their duties.

## 6. ARCHIVING

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Records relating to the handling of complaints covered by the complaints policy are retained for at least two years. Complaint files are retained for two years from the date on which a complaint is resolved.

## 7. RELATED DOCUMENTS

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- Code of Conduct
- Risk management policy
- Systematic risk analysis (SIRA)
- Central risk register
- Integrity policy
- Incident Management Policy
- Whistleblower Policy
- Training Plan

## 8. APPENDIX: EBA GUIDELINES ON COMPLAINTS POLICY

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The requirements relating to the complaints policy stem from the duty of care, further specified in the guidelines of the European Banking Authority published in June 2014:

### **1- Complaints handling policy**

There must be a complaints handling policy that is:

- a. approved by management, which is also responsible for its actual implementation and monitoring;
- b. set out in a document on good complaint and customer handling;
- c. made available to all relevant employees (internally) via an internal channel.

### **2- Internal complaint handling structure**

The organisation must define a complaint handling role that ensures that complaints are investigated fairly and properly and that any potential conflicts of interest are identified and resolved.

### **3- Registration**

There must be a complaints registration system that complies with the requirements of the regulations governing complaints (including timely handling).

### **4- Reporting**

Organisations must provide complaint information to the competent supervisory authority. This must include at least the number of complaints and may be further broken down according to national or internal criteria.

### **5- Internal follow-up/analysis**

Organisations must monitor and analyse complaints on an ongoing basis in order to identify recurring or systematic problems or risks. This can be done, for example, by:

- a. analysing the causes of individual complaints to identify a common cause;
- b. checking whether the cause/error in question also affects other business processes;
- c. resolving the cause of the problem (where reasonable).

## **6. Customer information about**

**complaints** Organisations should:

- a. upon request or upon receipt of a complaint, provide written information about the complaint handling procedure;
- b. make the details of the complaints procedure available in an easily accessible manner, for example via a website, brochures or contracts;
- c. provide clear and up-to-date information about the complaints procedure, which must include: (i) details about submitting a complaint (addressing the complaint, company contact details, information to be provided),  
(ii) an explanation of the procedure followed when handling a complaint (when the complaint is confirmed, the timelines for handling it and the availability of alternative complaint handling);
- d. keeping the complainant informed about the progress of the complaint.

## **7. Complaint handling procedure**

Organisations must:

- a. strive to investigate all relevant evidence and information relating to the complaint;
- b. communicate the outcome of the investigation in clear language;
- c. to respond without undue delay and within the timeframes applicable under national regulations. If the response cannot be provided within the expected timeframes, the organisation must indicate the reason for the delay and the date on which the investigation will be completed;
- d. When a response is given that does not meet expectations (or for any decision if this follows from national regulations), provide a thorough explanation of the organisation's view of the complaint and describe how the complainant can seek advice from a court, alternative dispute resolution or a complaints body. If required by law, this decision must be communicated in writing (by letter).