

## Complaint Handling Policy

Byelex Data Solutions NV  
Helium 12  
4751 XB Oud Gastel

Complaint Handling Policy v1.9

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### 1. Purpose

The purpose of this policy is to establish clear and transparent procedures for the efficient, fair, and consistent handling of complaints, in compliance with the MiCAR Regulation (EU) 2023/1114.

### 2. Scope

This policy applies to complaints received by Byelex Data Solutions from:

- Customers who use our services to purchase Bitcoin or Ethereum using cash or iDEAL.
- Other interested parties, such as consumer associations acting on behalf of our customers.

### 3. Definition of a Complaint

A formal communication made by a consumer or other stakeholder alleging dissatisfaction or non-compliance with the obligations, services, or conduct of a crypto-asset service provider, particularly in areas such as transparency, execution of transactions or information disclosure.

### 4. Complaint Handling Procedure

#### 4.1 Submission of Complaints

Complaints can be submitted free of charge through the following channels, providing the information that can be found on the **Complaint form** which can be found in the Frequently Asked questions on <https://byecoin.com/en/support/>:

- **Email:** [support@byecoin.com](mailto:support@byecoin.com)
- **Telephone:** +31(0)165 – 33 22 47
- **Postal Mail:** Helium 12, 4751 XB, Oud Gastel

To facilitate a prompt investigation, complaints should include:

- Full name, contact information (email, phone), and, if applicable, a legal representative's details.
- Description of the issue, including transaction details (e.g., transaction ID, date of payment) and relevant supporting documents.
- Preferred resolution or remedy.

#### **4.2 Acknowledgment**

Once a complaint is received, we will:

- Acknowledge receipt of the complaint within 5 business days.
- Provide the customer with a reference number for tracking the complaint.

#### **4.3 Investigation**

The complaint will be reviewed to ensure it contains all necessary information. If additional details are required, we will promptly contact the complainant. Our Complaint Handling Officer will conduct an impartial investigation, seeking to resolve the matter fairly. This period will take 10 to 15 business days.

#### **4.4 Resolution**

The final outcome of the investigation will be communicated within 15 business days. If additional time is necessary to complete the investigation, we will inform the customer of the reasons for the delay. In this case the processing time will be extended to 35 working days. In cases where the complaint is not upheld, we will provide a detailed explanation and information on how the decision can be challenged or escalated (e.g., through an ombudsman or national supervisory authority).

#### **4.5 Admissibility of Assessment**

Upon receipt of a complaint, the Complaints Handling Officer will assess within 2 working days whether the complaint is admissible. A complaint is admissible if:

- The complaint relates to the services of Byelex Data Solutions;
- The complaint is provided with all mandatory information (as described in Article 4.1);
- The complainant is entitled to submit the complaint.

If the complaint is not admissible, the complainant will be informed of this in writing, including reasons and follow-up steps.

#### **4.6 Guaranteeing impartiality**

To guarantee impartiality, the Complaints Handling Officer may not have been directly involved in the service or transaction to which the complaint relates. If there is a conflict of interest, an alternative officer will be appointed. This will be recorded in the complaints register.

#### 4.7 Decision-making

The outcome of the complaint is recorded in a written report (Complaint outcome report), which contains at least the following:

- The nature of the complaint;
- The findings from the investigation;
- The decision taken with a motivation;
- Any follow-up steps for the complainant.

This report is shared with the complainant and stored in the complaints register.

#### 5. Appeal

If the customer is dissatisfied with the given resolution, he/she does have the option to appeal by submitting an appeal in writing to support@byecoin.com within 30 days of receiving this report.

Within 5 business days an acknowledgement of receipt will be send to the customer. A decision on the appeal will be communicated with the customer within 4 to 6 weeks upon receipt.

#### 6. Communication and Accessibility

This Complaint Handling Policy, including a standardized complaint form, is available on our website and can be provided free of charge. Complaints may be submitted in the languages we use for customer communication and in any official language of the EU where our services are marketed.

#### 7. Record Keeping and Monitoring

We will maintain a secure electronic register of all complaints, along with any actions taken in response, for a minimum of 5 years. Complaint data will be analysed regularly to identify trends, recurring issues, and opportunities for service improvement.

##### 7.1 Data security

The complaints register is stored in a secure electronic system (FreshDesk) with access control. Only authorized employees have access to the register. The stored data complies with the requirements of the GDPR.

#### 8. Responsibilities

- **Service Desk:** This is a team of two persons which is responsible for reporting, assigning, closing and communicating to the customer about the complaint. Available 5 days a week during BDS' business hours.
- **Complaint Handling Officer:** This function is held by Roel Wolfert. He is responsible for the effective handling and resolution of complaints.
- **Senior Management:** Oversees the implementation and compliance with this policy, ensuring consistent monitoring of complaint trends and resolutions.

#### 9. Language

Any communication made by the Byelex Data Solutions under Articles 4, 5 and 6 that is addressed to a complainant shall be made in the language in which the complainant filed its

complaint provided that the language used by the complainant is one of the languages referred to in Article 3(2).