

## **Complaints procedure**

This policy outlines how customers can submit a complaint to INSIFR, how we handle complaints, what timelines apply, and how complaints can be escalated. It ensures fair treatment and regulatory compliance under our obligations, including those of our partner, Transact Payments Malta Limited (TPL).

### **How to make a complaint**

If something has gone wrong and you'd like to raise a concern, we're here to help. Most issues can be quickly resolved by reaching out to our support team.

You can submit a complaint in two ways:

- (i) by email: [support@insifr.com](mailto:support@insifr.com), or
- (ii) through the app.

Please provide:

- (i) your full name,
- (ii) the phone number and email associated with your account,
- (iii) a description of the issue and when it occurred, and
- (iv) how you'd like us to resolve it.

### **What happens after you submit a complaint**

We aim to handle all complaints promptly, fairly, and consistently.

- (i) acknowledgement:  
we'll confirm we received your complaint within 2 business days, and
- (ii) resolution:  
we aim to resolve your complaint within 15 business days.

If we're unable to resolve it within 15 business days, we will inform you of the delay, provide the reason, and let you know when you can expect a final response. In exceptional cases, the timeline may extend up to 35 business days.

### **What our response will include**

Once we've completed our investigation, we'll issue a Final Response Letter, which will contain:

- (i) a summary of the complaint,
- (ii) details of our findings,
- (iii) our final decision, and
- (iv) if applicable, how you can escalate the matter further.

### **Escalation options in case of dissatisfaction**

If you are not satisfied with our response, you may escalate your complaint further:

- (i) escalation to Transact Payments:

send an email to [complaints@transactpay.com](mailto:complaints@transactpay.com), including your original complaint and our response.

- (ii) escalation to the Arbiter for Financial Services (OAFS):

if you are still dissatisfied after contacting both INSIFR and TransactPay, you may submit your complaint to:

Office of the Arbiter for Financial Services (OAFS)

N/S in Regional Road,

Msida MSD 1920, Malta

Website: [www.financialarbiter.org.mt](http://www.financialarbiter.org.mt)

Email: [complaint.info@financialarbiter.org.mt](mailto:complaint.info@financialarbiter.org.mt)

Fee: €25 (refundable if the complaint is settled or withdrawn)

note: only natural persons and micro-enterprises are eligible. A micro-enterprise is a business that employs fewer than 10 people and has an annual turnover or balance sheet total of no more than €2,000,000.

- (iii) if you are not an eligible customer (i.e. not a private individual or a micro-enterprise), you may submit your complaint to:

Central Bank of Malta

Castille Place,

Valletta VLT 1060, Malta

Email: [complaints@centralbankmalta.org](mailto:complaints@centralbankmalta.org)

## How we record and monitor complaints

To ensure transparency and regulatory compliance, we maintain a detailed complaints register including:

- (i) reference number,
- (ii) date received,
- (iii) complaint level,
- (iv) first and last name of the complainant,
- (v) description of the issue,
- (vi) resolution provided,
- (vii) financial impact,
- (viii) date of resolution,
- (ix) assigned compliant owner, and
- (x) follow-up date (if needed).

## Record-keeping and approval

- (i) all complaint reports are subject to a 4-eyes approval process, reviewed by both the handling officer and our Head of Compliance, and
- (ii) records of complaints will be kept for a minimum of 5 years after the business relationship ends, in line with legal and regulatory requirements.

## Where to find this policy

Our Complaints Policy is publicly available at: [insifr.com/complaints](http://insifr.com/complaints)