Complaint Management

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1. Definitions

Complaint: the manifestation of a dispute by actual and/or potential customers, but also any third party otherwise linked to services or products offered by Braino.AI, clearly identifiable, or by subjects provided with a regular proxy, concerning an action or omission by the company. Requests for information or clarification are not considered complaints.

Customer: the subject who has or has had a contractual or pre-contractual relationship with the company.

Proponent: subject who submits the complaint in their own interest or on behalf of others.

Complainant: subject in whose interest the complaint is submitted.

Complaints register: the electronic tool in which the essential data of the complaint are annotated and stored.

2. The operational process for managing the complaint

The phases of the complaint management process are:

I. PHASE 1 RECEIPT AND INITIAL HANDLING OF THE COMPLAINT

II. PHASE 2 REGISTRATION OF THE COMPLAINT

III. PHASE 3 INVESTIGATION OF THE COMPLAINT

IV. PHASE 4 EVALUATION AND OUTCOME OF THE COMPLAINT

V. PHASE 5 COMMUNICATION TO THE CLIENT

VI. PHASE 6 CLOSURE OF THE COMPLAINT

2.1 Phase 1: Receiving and taking charge of the complaint

The back office is responsible for taking charge of complaints received from customers and forwarding them immediately to the Complaints Office.

The Complaints Office is composed of two qualified team members with experience in dispute resolution. The forwarding is done by assigning the ticket on the CRM to the members of the Complaints Office with a related notification.

Complaints can be submitted via:

- sending an email to a dedicated address: claim@braino.ai;
- submitting the request in the dedicated section in the APP, Complaints;
- filling in the form on the Complaints page of the website;
- verbal complaints, made by phone or in person. The person receiving them must invite the person making the complaint to formalize the complaint according to the official channels and, in any case, note the complainant's personal details, the subject of the complaint, and the date, and enter the request in the form of a written complaint.

In the prepared sections, to facilitate the profiling of requests and complaints, a drop-down menu is included with the following types:

- Information/advice
- Quality of the offer
- Tariffs and fees
- Failure or incorrect execution of a transaction
- Delays in processing a transaction
- Malfunctions
- Contesting a transaction due to lack of authorization (including fraud, loss, or theft of payment instruments)
- Problems with the account
- Account opening
- Account closure
- Account blocking
- Request for bank mobility or transfer
- Right to basic banking services
- Other

The details regarding the methods for submitting complaints are communicated to the customer in a dedicated section of the APP, on the website, and in the account opening contract.

If complaints are received through non-official channels, such as generic mailboxes or the PEC address, they are appropriately forwarded to the dedicated complaint management mailbox. Users are informed of this through an acknowledgment of receipt that specifies the communication processing times.

Complaints received via chat or verbally are also considered. The person receiving them must invite the person making the complaint to formalize the complaint according to the official channels and, in any case, note the complainant's personal details, the subject of the complaint, and the date and, if the complainant does not proceed on their own initiative, enter the request in the form of a written complaint.

The dedicated Back Office operator, upon receiving a complaint from the customer, ensures that the report includes the necessary information to be considered “manageable”, namely:

- the presence of personal data that allows the complainant to be identified;
- the clear indication regarding the service subject to the complaint and the content of the complaint itself.

If certain information necessary for taking charge of the complaint is missing (and cannot be independently retrieved by querying the company applications), the operator requests the customer, via email, to update the communication with this data.

2.2 Phase 2: Complaint registration

Received complaints are managed and “registered” by the Back Office team in the Ticketing system, which serves as the complaint register. The documentation received via email is kept within the system for the period required by law or regulation and for the entire duration of the contractual period.

Upon receipt of the email, the ticketing system automatically assigns the subject “Complaint”, a ticket number (Case number) to the complaint or request, which is functional for tracking, processing, assigning, and archiving the request.

The system automatically assigns:

- the Case identification number;
- the complaint management expiration date;
- the maximum number of days within which the complaint must be managed.

The following must be indicated in the Ticketing system for each complaint:

- date of receipt and date the report was taken in charge;
- name and surname of the complainant and the proposer;
- type/category of the complaint;
- treatability/non-treatability of the complaint;
- complaint status (under investigation, accepted, not accepted);
- text of the grievance;
- nature (economic or non-economic) of the damage suffered by the customer;
- amount of damage suffered by the customer (if identified or identifiable).

It is the responsibility of the operator assigned to the ticket to verify the completeness of the information.

If the complainant is a customer and the complaint is made through the App, the section relating to personal data is automatically completed by the system.

In the event that the subject making the complaint is not a customer, the operator is responsible for registering the subject's personal data, which is associated with a “light” personal data position created precisely during the complaint registration phase.

Regardless of how the complaint is received, it must be registered as soon as possible on the date it arrives in the complaint register, and the conversation must also be saved in the complaint files.

2.3 Phase 3: Complaint investigation

The Back Office is responsible for collecting and forwarding the complaint to the Complaints Office. The forwarding is done by email to the Complaints Office.

The management of the complaint is the responsibility of the Complaints Office.

The Complaints Office is responsible for tracking the complaint management (record keeping) and compiling statistics related to complaints, to be communicated to Treezor and, through it, to the Regulator.

The customer is informed of the correct receipt of the complaint submitted through the “acknowledgement of receipt”, sent within 10 (ten) business days of receipt. Communication with the customer takes place through the same channel used by the customer.

Communication via the ticketing system is done through automatic sending, while on other channels, manual intervention by the operator is required, by uploading it to the ticketing system. If the resolution of the complaint is concurrent with the acknowledgement of receipt, the operator immediately communicates the resolution to the interested party.

Following the acknowledgement of receipt, the investigation phase begins with the drafting of a document, which is archived in the complaints register, and which allows for a detailed analysis of the complaint in order to manage it correctly.

For complaints concerning payment services, the Company must respond within 15 (fifteen) business days of receipt. If, for exceptional reasons not attributable to Braino.AI, it is not possible to meet this deadline, an interim response will be provided to the Customer stating the reasons for the delay and the date by which the final response will be provided; in any case, the final response must be provided within 35 (thirty-five) business days of receipt of the complaint. For complaints concerning other matters, the final response must be provided within 60 (sixty) days of receipt of the complaint.

If it becomes necessary to extend the processing times in order to complete all the analyses started for a correct resolution of the complaint, it is the responsibility of the back office operator to inform the customer of the extension of the time necessary to process the case, providing indications about the cause of the extension.

The complaint management timeline in compliance with the expected times is monitored by the back office operators.

2.4 Phase 4: Evaluation of the complaint outcome

At the end of the preliminary investigation phase, the outcome of the complaint is evaluated.

If the complaint is considered well-founded, the company implements all actions aimed at its resolution.

If the complaint is considered unfounded, adequate reasons for the rejection are provided.

2.5 Phase 5: Communication to the Client

Upon completion of the evaluation of the complaint's outcome, the client is informed. This communication is sent using the same means the client used to submit the complaint and according to the dedicated procedures, in a manner similar to the acknowledgment of receipt.

2.6 Phase 6: Complaint closure

Following communication with the customer, the complaint status is updated in the register, determining the closure of the procedure.

In the event that complainants submit a further complaint, not considering the initial response satisfactory, the case will be reopened, and the documentary link with the previous complaint will be maintained within the register.

3. Management of the complaints archive

The management of the complaints archive, in both paper and electronic form, is the responsibility of the Complaints Office.

The complaints register, the related complaints and the related replies are stored electronically within Braino.AI's technological infrastructure.

The same archiving method, through dematerialisation and forwarding to the company, is also used for any paper complaints.

The Complaints Office is responsible for compiling statistics related to complaints, to be communicated to Treezor and, through it, to the Regulator.

4. Systems for Dispute Resolution

Braino.AI has established internal procedures to handle complaints and encourage the amicable resolution of disputes. In addition, external mechanisms may be available where the complaint cannot be resolved internally.

Braino.AI is committed to handling complaints in a fair, transparent and timely manner. This section explains how disputes may be managed internally and, if necessary, escalated to external dispute-resolution bodies such as the Arbitro Bancario Finanziario (ABF).

4.1 Complaints to Braino.AI

Customers may submit a complaint to Braino.AI using the following official channels:

- by email to: claim@braino.ai;
- by mail to: Braino.AI S.r.l. – Società Benefit, Via Ippodromo 56, 20151 Milano (MI), Italy;
- through the "Complaints" function in the App, or the form on the Complaints page of the website.

The complaint must include:

- full name;
- contact details for receiving a response;
- a clear description of the reasons for the complaint and the date of the relevant facts;
- any supporting documents.

Braino.AI will send an acknowledgement of receipt within 10 (ten) business days of receiving the complaint.

For complaints concerning payment services, the Company will provide a substantive reply within 15 (fifteen) business days of receipt, unless exceptional circumstances require an extension; in such cases, the Customer will be informed in writing of the reason for the delay and the expected date of the final reply, which will in no event be later than 35 (thirty-five) business days from receipt. For complaints concerning other matters, the substantive reply will be provided within 60 (sixty) days of receipt.

4.2 Escalation to Treezor

Where the complaint concerns payment and/or electronic money services provided by Treezor, the Customer may also submit a complaint directly to Treezor SAS, in accordance with Treezor's General Terms and Conditions of Use.

Customers can contact Treezor's complaints department at:

- Email: reclamations@treezor.com;
- Phone: (+33) (0)1 84 19 29 81;
- Postal address: Treezor, 33 avenue de Wagram, 75017 Paris, France.

4.3 Arbitro Bancario Finanziario (ABF)

If the Customer is not satisfied with Braino.AI's (and/or Treezor's) response to the complaint, or has not received a response within the applicable deadlines, the Customer may submit the dispute to the Arbitro Bancario Finanziario (ABF – Banking and Financial Ombudsman).

The ABF is an out-of-court dispute-resolution body set up by the Bank of Italy and may be used in the following conditions:

- the dispute must concern banking or payment services (including payment and electronic-money operations) provided by Braino.AI and Treezor;
- the value of the dispute must not exceed EUR 200,000;
- the Customer must have already submitted a written complaint to Braino.AI (and, where relevant, Treezor);
- the appeal to the ABF must be submitted within 12 months from the date of Braino.AI's reply or, if no reply has been received, within 12 months from the expiry of the applicable reply deadlines;

- the dispute must not already be pending before a court or other ADR body.

Further information on the ABF, including the user guide, forms, deadlines and contact details, is available on the official website: www.arbitrobancariofinanziario.it