

Complaints Handling Policy

Company:	Afterprime Europe Limited.
Number:	HE 360438
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1. Introduction

Afterprime Europe Limited (“**We**”, “**Us**”, “**Our**”, “**Afterprime**”, the “**Company**”) is authorized, licensed and regulated as a Cyprus Investment Firm (‘**CIF**’) by the Cyprus Securities and Exchange Commission (‘**CySEC**’) under license number 368/18 and is operating in accordance with the provisions of the ‘**Investment Services and Activities and Regulated Markets Law of 2017**’ (L. 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets’ (the “**Investment Services Law**”), as the same may be in force from time to time and modified and amended from time to time.

This Complaints Handling Policy provides information on how to formally complain in the unlikely event that they are not satisfied with any aspect of our service.

2. Definitions

A **Complainant** means any person, natural or legal, who is a client of the Company.

A **Complaint** is a statement of dissatisfaction addressed to the Company, as per the procedure stated in this Policy, by a natural or a legal person (the Complainant) in relation to one or more of the investment services provided by the Company.

In the case that the Company receives a notice through the line of communication established by the Company to receive complaints, but which does not fall within the definition of 'complaint' above and can be characterized as an enquiry; this shall be categorized as an enquiry rather than a complaint and will be forwarded to the relevant department to be handled accordingly. The complainant maintains the right to request for the re-classification of his enquiry as a complaint.

3. Procedure

a) Submitting your Complaint

You may submit your complaint in writing and addressed to the Compliance Department of Afterprime at Compliance@afterprime.eu where your complaint shall be handled and investigated accordingly.

b) Acknowledging your Complaint

We will acknowledge receipt of your complaint within five (5) business day(s) from the receipt of your complaint and provide you the unique reference number of your complaint. The unique reference number should be used in all your future contact with the Company, the Financial Ombudsman and/or CySEC regarding the specific complaint.

c) Handling of your Complaint

Once we acknowledge receipt of your complaint we will review it carefully, investigate the circumstances surrounding your complaint and will try to resolve it without undue delay.

We shall make every effort to investigate your complaint and provide you with the outcome of our investigation within two (2) months from the date you have submitted your complaint to us. During the investigation process will keep you updated of the handling process of your complaint. One of our officers may contact you directly (including communication by email or phone) in order to obtain further clarifications (where needed) and information relating to your complaint. Please note that the Company shall consider your complaint as closed and cease the relevant investigation in case you fail to respond to our officers within the period of three (3) months from the date of the submission of your complaint. We will require your full cooperation in order to expedite the investigation and possible resolution of your complaint.

In the event that your complaint requires further investigation and we cannot resolve it within two (2) months, we will issue a holding response in writing or another durable medium. When a holding response is sent, it will indicate the causes of the delay and when the Company's investigation is likely to be completed. In any event, we shall provide you with the outcome of our investigation no later than one (1) month from the issuing of the holding response, depending on the complexity of the case and your cooperation.

d) Final Decision

When we reach an outcome, we will inform you of it together with an explanation of our position and any remedy measures we intend to take (if applicable), shall be communicated to you within the above timeframes.

If you are not satisfied with the Company's final decision you may submit your complaint to the Financial Ombudsman of the Republic of Cyprus and seek mediation for possible compensation. It is important that you contact the Financial Ombudsman of the Republic of Cyprus within four (4) months of receiving a final response from the Company otherwise the Financial Ombudsman of the Republic of Cyprus may not be able to deal with your complaint.

Contact Details of the Financial Ombudsman of the Republic of Cyprus:

- **Website:** <http://www.financialombudsman.gov.cy>

- **Email:** complaints@financialombudsman.gov.cy
- **Postal Address:** P.O. BOX: 25735, 1311 Nicosia, Cyprus
- **Telephone:** +35722848900
- **Fax:** +35722660584, +35722660118

In the unlikely event that the Company was unable to provide you with a final response within the three

(3) month time period specified above you may again contact the office of the Financial Ombudsman of the Republic of Cyprus no later than four (4) months after the date when we ought to have provided you with our final decision.

Contact Details of the Cyprus Securities and Exchange Commission:

- **Website:** <http://www.cysec.gov.cy>
- **General email:** info@cysec.gov.cy
- **Postal Address:** P.O. BOX 24996, 1306 Nicosia, Cyprus
- **Telephone:** +35722506600
- **Fax:** +35722506700

You may maintain your complaint with the Cyprus Securities and Exchange Commission. However please note that the Cyprus Securities and Exchange Commission does not have restitution powers and therefore does not investigate individual complaints.

It is understood that your right to take legal action remains unaffected by the existence or use of any complaints procedures referred to above.



www.afterprime.eu
support@afterprime.eu