



# GlobalBlock EU ApS

## Complaints Handling Procedure

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## Document details

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Firm:	Globalblock EU ApS
Document owner:	Operations
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## Document Control

Version	Date	Author	Details
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### 1. Introduction

At Globalblock EU ApS (the "Firm"), our goal is to resolve a customer's dissatisfaction as soon as possible and address the route of the issue or concern directly, rather than a customer feeling a complaint is the only route for them. We have adopted a Complaint Handling approach (as set out in this Complaints Handling Procedure) that would satisfy regulatory and customer expectations across multiple jurisdictions in the European Union ("EU").

This Complaints Handling Procedure sets out the effective and transparent procedure that the Firm has established for the prompt, fair and consistent handling of complaints received from clients. Filing a complaint with the Firm and the subsequent handling thereof is always free of charge (of which clients are informed in our description of this Complaints Handling Procedure, as made available on our website and in-app)

This Complaints Handling Procedure considers the requirements of article 71 of Regulation (EU) 2023/1114 on markets in crypto-assets ("MiCAR") and the Regulatory Technical Standard on Complaints Handling by Crypto-asset Service Providers ("CASPs") thereto.

A description of how to contact the Firm is available via in-app and on our website [www.globalblock.eu](http://www.globalblock.eu), as well as the Firm template (Annex A) form for filing a Complaint (which template is aligned with the standard template included in the Annex to the RTS on Complaints Handlings by CASPs).

### 2. Conditions for admissibility of complaints

We encourage anyone to first contact the Firm before making a formal complaint via email at [info@globalblock.eu](mailto:info@globalblock.eu).

However, this is *not* a condition for filing a complaint, meaning that clients that did not first reach out to us with a particular query can directly file a complaint if they want to.

The following conditions for admissibility of complaints apply:

- (1) the complainant is a customer of the Firm;
- (2) the customer's complaint is a statement of dissatisfaction addressed to the Firm in relation to the provision of crypto-asset services provided by the Firm to the customer;
- (3) the customer's complaint has been submitted through the eligible channels (in-app, through the complaints form on our website or by email); and
- (4) the complaint includes a clear description of the transaction/agreement, the complaint incl. date(s) and time(s) and a description of damages, loss or detriment incurred by the complainant.

### 3. Submission means & language

Customers can file a complaint by submitting the Firm template (Annex A) in-app or through the website or by submitting a formal complaint via email to support-uk@strike.me. The use of the Firm template is not mandatory.

Filing of such complaints is possible in all official languages of the EU.

### 4. Complaints Handling Process

The Firm's Compliance team members will receive a notification once the template (Annex A) has been submitted (in-app or through the website) or a formal complaint is submitted via email to info@globalblock.eu.

Regardless of the filing format chosen by the complainant, all complaints are reviewed by the Firm's operations in accordance with the following process:

1. Operations acknowledges receipt of the complaint and provides clear and accurate written information about the complaints-handling process within 72 hours following receipt of the complaint or the following business day to the complainant.
2. The acknowledgement of receipt provides the complainant with:
  - a. contact information for getting in touch with a operations member with any queries in relation to the filed complaint (including email address and telephone number of the operations department).
  - b. the date on which the complaint was received by the Firm.
  - c. information on the timelines applied by the Firm to decide upon to the complaint within 40 business days following receipt, which period includes 10 business days to request additional information (where needed) and 30 business days to investigate a complaint.
  - d. a copy of the filed complaint.
3. Operations shall assess whether the complaint is clear and complete, whether the complaint contains all relevant information and evidence. Where the complaint does not meet the admissibility criteria as listed above, the claim will be rejected, and the complainant will be provided with a clear explanation for this rejection.
4. Operations can contact the complainant for additional information, evidence, or clarification to support the complaint investigation. If so, operations will reach out to the complainant within 10

business days following receipt of the complaint.

5. Operations must document all analysis and checks completed as part of the investigation.
6. Operations must assess the complaint in a fair, reasonable, and objective manner, without restricting the rights of the complainant to file a complaint (by e.g. fairly applying the admissibility criteria set out above).

The investigation conducted by operations may include conversations with compliance and senior management.

7. By no later than close of business on the 40th business day following receipt of the complaint, operations will have responded to the complainant with the following possible outcome(s):
  - (i) resolve the complaint in the way the complainant requested, or
  - (ii) decide to (partly) reject the complaint, provide a rationale as to why and inform the complainant of the availability of the external sources for customer complaints (as listed in paragraph 6 below), or
  - (iii) provide an update to the complainant on why the complaint has not yet been resolved within the previously communicated timelines, with information on the expected date of the decision and progress this, or
  - (iv) offer to resolve the complaint with an alternative solution stating clearly what that solution is and how / why we got to that solution.

Any decision taken on a complaint should address all points raised in the complaint and state the reasons for the outcome of the investigation. Any actions required by the complainant must be clearly stated with reasonable timeframes to take the action.

8. Upon a complainant's explicit request, communication in respect of the filed complaint takes place in paper form instead of by email.
9. The types of compensation provided to the complainant depend on the complaint but can include forms of compensation.

## 5. Registering and safekeeping of complaints

All documentation and correspondence to and from the complainant and our supporting documentation must be saved for 5 years.

## 6. Oversight and Governance

The Firm's management board is ultimately responsible for defining and endorsing this Complaint Handlings Procedure, and is responsible for monitoring, proper implementation, and periodical review. CEO David Thomas has been appointed as the person responsible for complaints handling.

The operations team is responsible for adequately managing the Complaints Handling process and all communications with complainants. On an ongoing basis, the operations team will review the complaints handling data to ensure that they identify and address any recurring or systematic problems and potential legal and operational risks. This review will include:

1. Root cause analysis of individual complaints to identify commonalities between them (and to identify the categories to which these complaints relate).
2. Consider whether these root causes may also affect other processes or products that might have not been directly part of the complaint.
3. Set up a plan to mitigate the root causes.

4. The average processing time of complaints for each step of the complaints handling process (including acknowledgment, investigation and response time).
5. The number of complaints received.
6. The outcomes of investigations.

The operations team will report the outcome of the above-mentioned review directly to the management body.

## 7. Publication of description

A description of this Complaints Handling Procedure is made available on our website and in-app. Any material updates to this Complaints Handling Procedure requires the available description to be updated.

In addition, the Firm will publish the 'Make a Complaint' button on its homepage and in-app. This is to ensure that the location of the published complaint landing procedure is clearly visible, easily accessible and not overlooked by anyone who wants to make a formal complaint.

The operations team is responsible for ensuring that the available description remains up to date.

## 8. Training

All employees and management body members of the Firm will receive annual training on Complaints Handling as part of their onboarding and annually thereafter. The training will be provided by our outsourced online training provider.

## Annex A

Below is the complaint form that can be completed by the customer, through the website or in-app. All complaints submitted, regardless of whether submitted through this template, will be treated as per the Complaints Handling Process.

<b>FILING OF A COMPLAINT</b>
<b><i>1.a. Information about the complainant</i></b>
Last name / Legal entity name:
First name:
EUID or if not available national Registration or ID number:
Legal Entity Identifier (if available):
Client reference (if available):
Address (street, number, floor) (for legal entities, registered office)
Postcode:
City:
Country:
Telephone:
Email address:
<b><i>1.b. Contact details (if different from 1.a.)</i></b>
Last name / Legal entity name:
First name:
Address (street, number, floor) (for legal entities, registered office)
Postcode:
City:
Country:
Telephone:
Email address:
<b><i>2.a. Information about the legal representative (if applicable) (a power of attorney or other official document as proof of the appointment of the representative to be appointed as an attachments to this form)</i></b>
Last name / Legal entity name:
First name:
Registration number and LEI (if available):
Address (street, number, floor) (for legal entities, registered office)
Postcode:
City:
Country:
Telephone:
Email address:
<b><i>2.b. Contact details (if different from 2.a.)</i></b>
Last name / Legal entity name:
First name:
Address (street, number, floor) (for legal entities, registered office)
Postcode:
City:

Country:
Telephone:
Email address:
<b>3. Information about the complaints</b>
3.a. Full reference of the crypto-asset service to which the complaint relates (i.e. the complaints relate to the Firm, provide crypto-asset service reference number, or other references of the relevant transaction).
3.b. Description of the complaint's subject-matter, including any documentation supporting the facts mentioned.
3.c. Date(s) of the facts that have led to the complaint.
3.d. Description of damage, loss or detriment causes (where relevant)
3.e. Other comments or relevant information (where relevant)
<p>In [PLACE] on [DATE]</p> <p>[SIGNATURE OF COMPLAINANT / LEGAL REPRESENTATIVE OF THE COMPLAINANT]</p> <p>Documentation provided (please check the appropriate box):</p> <p><input type="checkbox"/> <i>Power of attorney or other official document as proof of the appointment of the representative</i></p> <p><input type="checkbox"/> <i>Copy of the contractual document of the investments to which the complaint relates</i></p> <p><input type="checkbox"/> <i>Other documents supporting the complaint:</i></p>