

Approved by Order No. CS-23/22
of Clearshift CEO dated 2023 July 27

CLEARSHIFT CLIENTS' COMPLAINTS SETTLEMENT REGULATIONS

1. General Provisions

1.1. These client complaints settlement regulations (hereinafter – the **regulations**) establish the procedure for the submission, examination, and reply to client complaints by Clearshift (hereinafter – **the Company**) regarding the Services provided by the company and/ or the agreements concluded/ to be concluded with it.

1.2. These rules were adopted pursuant to the Order #2022-10-17 - הוראות המפקח על השירותים - **טיפול בתלונות ציבור** published November 29, 2022 . Link to the law definitions in the regulations is the same as stated in the up-to-date version of the company's terms & conditions unless otherwise provided in the regulations.

1.3. The company strives for a quick, fair, and efficient complaints process. Employees of the company must avoid conflicts of interest that may affect their objectivity.

1.4. The company adheres to the deadlines for processing complaints.

1.5. The company ensures that it will use the personal data and other information provided by the applicant in compliance with the requirements established by legal acts.

2. Submission of Complaints

2.1. The client, believing that the company has violated his rights or interests protected by law related to the provision of the services, must contact the company by email (support@clearshiftinc.com) or fill in the complaint form. The complaint form must include the following:

- (i) Contact person's details and details about the client;
- (ii) The details of the dispute and the supporting documents (if any);
- (iii) Clearly stated requirements and requests.

If the circumstances set out in the complaint relate to a specific client account and/ or payment, such information must be provided as well.

2.2. The client may submit a complaint by filling out the request form on Clearshift's website. The form can be found [here](#).

2.3. After submitting the complaint, a responsible employee will contact you and provide information on the further steps.

2.4. The complaint must be submitted in English or Hebrew. If the complaint and/ or other documents are submitted in a language other than English or Hebrew, the company has the right to request documents to be translated into English. The translation of documents must be certified by a translator and/ or notarized. Failure to comply with the requirements will result in the complaint not being considered.

2.5. The company has the right not to consider unsigned complaints, as well as complaints that do not contain sufficient data identifying the client. In this case, we will contact the complainant using the contact information provided in the complaint form to gather additional information.

2.6. In cases where the company is not responsible for carrying out the activities specified in the applicant's complaint, the company must respond to the applicant, indicating the reasons for refusing to accept and examine the complaint, and, if possible, indicating to the applicant the financial market participant responsible for examining his complaint.

2.7. The client has the right to withdraw the complaint at any time.

3. Examination and reply to complaints

3.1. If the complaint is related to the **payment services** provided by the company, the company is obliged to consider the written complaint of the user and give a clear and detailed written response via reliable communication no later than **15 business days** from the date of receipt of the complaint. In exceptional cases where, for reasons beyond the control of the company, it is not possible to provide a response within **15 business days**, an inconclusive response will be sent to the complainant, clearly indicating the reasons for the delay in the response and the period during which the complainant will receive a final response. The deadline for submitting a final response should not exceed **35 business days** from the date of receipt of the complaint.

3.2. In other cases, when the complaint **is not related to the payment services** provided by the company, the complaint is considered and a written response is provided to the complainant as soon as possible, but no later than **30 calendar days** after receipt of the complaint. In special cases (complaint consideration is difficult), the period for consideration of the complaint may be extended. The complainant will be informed in advance about the extension of the complaint review period, the reasons, and the expected response time.

3.3. The handling of complaints is free of charge.

3.4. Responses to complaints are prepared in English or Hebrew (depending on the language of the Complaint).

3.5. The response to the Customer's complaint shall be provided in writing in the same manner as the complaint was received.

3.6. If the company does not satisfy the client's requirements or satisfies them in part, in all cases the company must provide a detailed reasoned written answer based on documents and indicate other means of protection of the client's interests. Copies of the documents substantiating the answer, which the client does not have, must be attached to the answer to the client.

3.7. Repeated or anonymous complaints are not considered.

3.8. If the complaint contains requirements, issues, or circumstances that do not fall within the purview of the company, they shall not be examined and, if possible, the client shall be directed to an appropriate authority or entity where he or she may apply.

4. Final Provisions

4.1. The handling of complaints is governed by the laws of the state of Israel.

4.2. The CEO is responsible for the implementation of the complaint handling policy as well as the periodic verification and assessment of the effectiveness of the policy and shall take appropriate measures to correct identified deficiencies.

4.3. All employees of the company who may be affected must be informed of the complaint handling policy.

4.4. If the complainant is not satisfied with the company's response or if the complainant did not receive a timely response, the complainant has the right to apply ביטוח וחסכון, רשות שוק ההון, to the relevant authority.

- 4.5. If the complainant is not satisfied with the company's response to the complaint, the complainant has the right to apply to the court following the procedure established by the laws of the state of Israel.
- 4.6. Clearshift must keep the applicants' complaints, the material related to their examination, the document indicating the specific result of the examination of the complaint, and the answer provided to the applicant for at least 3 years from the date of submission of the final answer.
- 4.7. This Regulation is intended for internal and external use.