Complaints Handling Policy

Stripe Technology Europe Limited

2020

If you have questions or suggestions about this Complaints Handling Policy or complaints-related queries, please contact complaints@stripe.com.

Overview

Stripe Inc. and all its entities and subsidiaries, including but not limited to Stripe Technology Europe Limited ("Stripe"), expect our employees to maintain the highest standards of ethics and compliance with applicable laws and rules. We are committed to addressing the needs and concerns of our users. By this, we mean the entity or person ("you" or "user") who registered on the Stripe Account page.

This Complaints Handling Policy ("Policy") outlines our handling of complaints made against Stripe. This Policy should be read in conjunction with the Stripe Services Agreement for Ireland or your applicable EEA country:

• https://stripe.com/ie/ssa

What is a complaint?

Broadly, for the purposes of this Policy, Stripe defines a complaint as follows¹:

An expression of dissatisfaction made to an organisation, related to its products or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected and/or that claims that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

A complaint may be in written or verbal format; however, we encourage you to make your complaint in writing so as to be clear and unambiguous.

When is it too late to complain?

Complaints should be made within the time limits for referral to the Financial Services and Pensions Ombudsman in Ireland; otherwise, Stripe may reject the complaint without further review. However, you'll still receive a response explaining this.

¹Note that under the Irish Consumer Protection Code (CPC), "complaint" refers to an expression of grievance or dissatisfaction by a consumer, either orally or in writing, in connection with:

a) the provision or the offer of the provision of a product or service to a consumer by a regulated entity; or b) the failure or refusal of a regulated entity to provide a product or service to a consumer. We will apply this definition to you if you are a consumer in Ireland.

Complaints that may be rejected include those received more than **six years** following the conduct or incident resulting in your complaint.

What is not a complaint?

Occasionally, Stripe receives negative feedback that does require a resolution or formal follow-up and is not covered by this Policy. Please note that this feedback is valuable to Stripe even if we cannot reply in all instances.

Who is a Complainant?

A complainant for the purposes of this Policy is a Stripe user. This Policy does not cover complaints brought by persons or organisations that are not Stripe users, including those who make payments to you (your "Customers").

In the event that we receive a complaint from a Customer that is not a Stripe user, we will follow our normal support process and redirect the Customer to the appropriate user.

Where you are a consumer in Ireland, as defined in the Irish Consumer Protection Code, and you are making a complaint to Stripe, your complaint will be handled in accordance with the complaints process set out in this Policy.

How to make a complaint

To make a complaint, go to <u>https://stripe.com/complaints</u>, log in and complete our <u>Complaints Submission Form</u>.

For written complaints, please send your complaint to:

One Grand Canal Street Lower, Grand Canal Dock, Dublin 2.

Please include in your complaint:

- Name of complainant
- Contact details
- Stripe user details, including Stripe Account

- The nature of the complaint, including when the conduct or incident giving rise to the complaint occurred; and
- Copies of any documentation supporting the complaint.

Complaint Process

Stripe will carefully consider your complaint, investigating the conduct or incident while taking into account all relevant factors, before providing a response.

If Stripe considers that feedback does not qualify as a complaint (for example, as a result of user error), Stripe may send a final response rejecting the complaint and explaining the basis for doing so.

Similarly, if we find that another party is responsible for the underlying conduct or incident, Stripe may redirect a complainant to that party.

Stripe considers information received via complaints as valuable feedback, and applies lessons learned to the Service.

Response time

Stripe aims to:

- Acknowledge your complaint promptly and within 5 business days of Stripe receiving the complaint.
- Provide the name of one or more individuals to be your point of contact in relation to the complaint.
- Provide a final response within **15 business days** of Stripe receiving the complaint.
- In exceptional circumstances, where we're unable to reach a final conclusion within 15 business days, Stripe will respond with a rationale and indication as to when a final response can be expected, which will be within **35 business days** of Stripe receiving the complaint.
- Whenever we have completed our investigation, we will issue our final response promptly and within 5 business days.

What you can expect from our response

Unless verbal, Stripe's response will be in the format in which it was received (i.e. email if email, paper if paper). Verbal complaints will be responded to via email.

The final response will:

- Accept the complaint and where appropriate, offer redress or remedial action,
- Offer redress or remedial action without accepting the complaint, OR
- Explain Stripe's position in the event that we reject the complaint

We may also refer you to the Financial Services and Pensions Ombudsman at:

- <u>https://www.fspo.ie/</u>. This is the website of the Financial Services and Pensions Ombudsman and provides details of the complaints that can be made to the ombudsman and its process.
- Address: Lincoln House, Lincoln Place, Dublin 2,D02 VH29
- Phone:+353 1 567 7000
- Email: info@fspo.ie

Where redress or remedial action is deemed appropriate, Stripe will deliver on this offer promptly.

If you don't respond, or if you indicate acceptance, Stripe considers a complaint resolved.

Record Retention

Complaints and records associated with customer complaints are kept for a minimum of six years in line with Stripe's record retention policy.

Appendix: Stripe Service

Stripe operates a technology platform that enables Stripe users to receive forms of payment for products and services primarily online, as well as to conduct other movement of funds within certain parameters (the "Payment Processing Service"). Stripe's platform may also allow Stripe users to view account information in relation to accounts held with third parties, and to initiate payments from those accounts (the "Account Information and Payment Initiation Service", and together with the Payment Processing Service, the "Services"). These services are offered by a regulated entity, Stripe Technology Europe Limited, in Ireland.

The Payment Processing Service facilitates the acceptance and transmission of payment data on behalf of Stripe's users and, through its banking and payment processing providers and applicable payment networks (including card networks, electronic fund transfer systems such as Automated Clearing House or ACH, or alternative payment methods such as Alipay), process the payment according to the applicable rules and regulations. In connection with the Payment Processing Service, Stripe provides instructions to the applicable financial institution to fund a user's designated bank account from an account controlled by the financial institution (e.g. an account titled "For Benefit of Stripe users" or "Client Money Account"). These instructions include to hold or releases funds in amounts equivalent to the net proceeds of the user's payments based on the user's request.