



SIA “Viainvest”
COMPLAINTS HANDLING RULES

Version 04
18.05.2026.

Approved by decision of SIA “Viainvest” Management Board:	2026-18-BD of 18.05.2026.
Effective date:	16.06.2026.

SIA “Viainvest” (registration No. 40203015744, registered address: Roberta Hirša iela 1, Rīga, LV-1045, Latvia) is an investment firm licensed and supervised by Latvijas Banka (www.bank.lv; registered address: K. Valdemāra iela 2A, Rīga, LV-1050, Latvia). Licence number: 27-55/2023/2.

1. Terms and Abbreviations

- 1.1. **Rules** – this VIAINVEST public document “Complaints Handling Rules”, together with all subsequent amendments, supplements and appendices thereto, which is also available on the Website.
- 1.2. **Consumer** – within the meaning of the Consumer Rights Protection Law of the Republic of Latvia: a natural person who expresses a wish to purchase, purchases, or might purchase or use a service or digital service for a purpose that is not related to their economic or professional activity.
- 1.3. **Complaint** – a written expression of dissatisfaction submitted by the Complainant regarding the investment services, ancillary investment services provided by VIAINVEST, or related actions or omissions by VIAINVEST.
- 1.4. **Complainant** – a person who has submitted a Complaint to VIAINVEST.
- 1.5. **Website** – the website <https://viainvest.com/>.
- 1.6. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- 1.7. **VIAINVEST** – SIA “Viainvest”, which is:
 - 1.7.1.a commercial company registered in the Republic of Latvia (registration No. 40203015744, registered address: Roberta Hirša iela 1, Riga, LV-1045, Latvia);
 - 1.7.2.an investment firm licensed and supervised by Latvijas Banka (www.bank.lv; registered address: K. Valdemāra iela 2A, Riga, LV-1050, Latvia) (licence number 27-55/2023/2).

2. Purpose and Scope

- 2.1. VIAINVEST ensures that Complaints submitted by Complainants — clients, former clients, potential clients and their authorised representatives — are handled free of charge, promptly, fairly, equally and effectively.
- 2.2. These Rules apply to Complaints regarding the investment services and ancillary investment services provided by VIAINVEST, as well as the actions of VIAINVEST employees or representatives in connection with these services.
- 2.3. The Rules are available on the Website. At the request of the Complainant, VIAINVEST shall also provide the possibility to access the Rules in another appropriate form.
- 2.4. These Rules do not limit the Complainant’s right to use other remedies provided for by applicable laws and regulations.

3. Complaint Submission Channels

- 3.1. A Complaint may be submitted to VIAINVEST:
 - 3.1.1.electronically, by writing to the e-mail address info@viainvest.com;
 - 3.1.2.by post, by writing to VIAINVEST’s registered address: Roberta Hirša iela 1, Riga, LV-1045, Latvia.
- 3.2. If the Complaint relates to the processing of personal data and the Complainant wishes to contact VIAINVEST’s Data Protection Officer, the Complaint may also be submitted by writing to the e-mail address dpo@viainvest.com.
- 3.3. If VIAINVEST receives a Complaint through another VIAINVEST communication channel, VIAINVEST shall ensure that it is forwarded for review in accordance with these Rules.

4. Information to Be Included in a Complaint

- 4.1. In order for VIAINVEST to be able to review a Complaint effectively and comprehensively, the Complaint should include at least the following information:
- 4.1.1. for a Complainant who is a natural person: given name and surname, personal identity number (for residents), date of birth (for non-residents), residential address;
 - 4.1.2. for a Complainant who is a legal person: name, registration number, given name and surname of the authorised person, basis of representation;
 - 4.1.3. investor number, if the Complainant is an existing or former VIAINVEST client;
 - 4.1.4. date and place of submission of the Complaint;
 - 4.1.5. substance of the Complaint, facts and circumstances;
 - 4.1.6. the Complainant's claim;
 - 4.1.7. list of documents attached to the Complaint substantiating the substance of the Complaint, if any;
 - 4.1.8. contact information, e-mail address or postal address;
 - 4.1.9. preferred method of receiving the response — by post or by e-mail; if the preferred method of receiving the response is not indicated, the response shall be provided by e-mail to the e-mail address indicated by the Complainant;
 - 4.1.10. if the Complaint is submitted by a representative: documents certifying the right of representation;
 - 4.1.11. handwritten signature of the Complainant or their representative or, if the Complaint is submitted electronically, a secure electronic signature.
- 4.2. If the Complainant is a Consumer, a signature is not mandatory for a Complaint submitted electronically.
- 4.3. VIAINVEST does not review anonymous Complaints, i.e. Complaints where the submitter is not indicated or cannot be identified.
- 4.4. In case of suspicion, for example, where indications of identity theft have been identified, an employee of VIAINVEST has the right to ask the Complainant to undergo an identification process in order to verify the Complainant's identity before accepting the Complaint or before providing a response.

5. Language of the Complaint

- 5.1. A Complaint may be submitted in Latvian or English.
- 5.2. If a Complaint is submitted in Latvian, the response shall be provided in Latvian; if a Complaint is submitted in English, the response shall be provided in English.
- 5.3. If a Complaint or its appendices are submitted in another language, VIAINVEST:
- 5.3.1. assesses whether the content of the Complaint is sufficiently understandable for its review. If necessary for a fair, comprehensive and objective review of the Complaint, VIAINVEST may request the Complainant to submit a translation of the Complaint or its appendices into Latvian or English;
 - 5.3.2. may use translation tools, including machine translation solutions, for the initial assessment, processing and internal record-keeping of the Complaint. Machine translation shall not be considered an official or certified translation, and VIAINVEST has the right to request the Complainant to submit a translation into Latvian or English.

5.4. If a Complaint or its appendices are submitted in another language, the response to the Complainant is provided in English, unless otherwise agreed with the Complainant. VIAINVEST may use translation tools to prepare or verify the translation of the response into another language; however, the response in English prevails, unless VIAINVEST has expressly indicated otherwise.

6. Receipt of a Complaint, Time Limits and Procedure for Review

6.1. If a Complaint is submitted electronically, VIAINVEST immediately confirms receipt of the Complaint to the Complainant and provides brief information on the Complaint review process.

6.2. VIAINVEST reviews the facts indicated in the Complaint, requests and verifies the necessary information and evidence within the limits of its competence and capabilities.

6.3. If additional information is required for the review of the Complaint, VIAINVEST may contact the Complainant, requesting clarifications or additional information/ documents.

6.4. If the Complainant is a Consumer, VIAINVEST provides a written response within 15 (fifteen) business days from the date of receipt of the Complaint.

6.5. If the Complainant is not a Consumer, VIAINVEST provides a response without undue delay and usually no later than within 30 (thirty) calendar days, unless applicable laws and regulations provide for another time limit.

6.6. If, for objective reasons, it is not possible to provide a response to the Complaint within the above-mentioned time limits, VIAINVEST promptly informs the Complainant thereof in writing, indicating a reasonable time limit within which the response will be provided, as well as justifying the need for such extension.

6.7. If the Complaint also includes a request by the Complainant as a data subject to exercise the rights provided for in the GDPR, VIAINVEST responds to such request without undue delay, but no later than within one month from receipt of the request. Where necessary, taking into account the complexity and number of requests, VIAINVEST may extend this time limit by a further two months, informing the Complainant thereof within one month from receipt of the request.

7. Response to a Complaint

7.1. VIAINVEST carefully assesses each Complaint and provides a reasoned, clear and understandable response. In its response, VIAINVEST indicates:

- 7.1.1. which circumstances referred to in the Complaint were assessed;
- 7.1.2. what conclusions VIAINVEST has reached following the review of the Complaint;
- 7.1.3. whether the Complaint is considered justified, partially justified or unjustified;
- 7.1.4. what solutions, corrections or other measures VIAINVEST will take, if any are necessary;
- 7.1.5. where the Complainant may turn next if they are fully or partially dissatisfied with the response provided by VIAINVEST.

8. Other Complaint and Dispute Resolution Options

8.1. If the Complainant is not satisfied with the response provided by VIAINVEST or the outcome of the Complaint review, the Complainant has the right to use other complaint and dispute resolution mechanisms provided for by applicable laws and regulations.

8.2. If the Complainant considers that VIAINVEST's actions may constitute a breach of laws and regulations governing the financial markets, the Complainant may contact Latvijas Banka as the supervisory authority.

8.3. Contact information of Latvijas Banka:

K. Valdemāra iela 2A, Rīga, LV-1050

Phone: +371 67022300

E-mail: info@bank.lv

8.4. Contacting Latvijas Banka does not replace the resolution of a civil law dispute between the Complainant and VIAINVEST. Latvijas Banka assesses possible breaches of laws and regulations governing the financial markets, whereas civil law disputes regarding claims, losses or performance of a contract shall be resolved by mutual agreement or in court.

8.5. If the Complainant is a Consumer and is not satisfied with VIAINVEST's response or if the response has not been provided within the time limit set by applicable laws and regulations, the Complainant may contact the Consumer Rights Protection Centre (CRPC), including the Consumer Dispute Resolution Commission, another out-of-court dispute resolution body competent in the relevant field, if such body has been established in the relevant field, or a court.

8.6. Contact information of the Consumer Rights Protection Centre:

Brīvības iela 55, Rīga, LV-1010

Phone: +371 65452554

E-mail: pasts@ptac.gov.lv

8.7. If the Complaint relates to possible fraud or the Complainant has suffered losses as a result of a possible criminal offence, the Complainant may contact the State Police of the Republic of Latvia or the competent law enforcement authority of their country.

8.8. If the Complaint relates to the processing of the Complainant's personal data and the Complainant considers that VIAINVEST has breached the requirements of the GDPR when processing their personal data, the Complainant has the right to submit a complaint to the Data State Inspectorate.

8.9. Contact information of the Data State Inspectorate:

Elijas iela 17, Rīga, LV-1050

E-mail: pasts@dvi.gov.lv

Phone: +371 67223131

8.10. VIAINVEST first seeks to resolve any dispute by mutual agreement. If no agreement can be reached, the dispute shall be resolved in court in accordance with the laws and regulations in force in the Republic of Latvia.

8.11. Disputes regarding the investment services and ancillary investment services provided by VIAINVEST shall be heard by the Economic Court of the Republic of Latvia if such dispute falls within the jurisdiction of that court under applicable laws and regulations. In other cases, disputes shall be heard by the Riga City Court of the Republic of Latvia or another competent court in accordance with applicable laws and regulations.

9. Personal Data Processing

9.1. VIAINVEST processes the personal data indicated in a Complaint only for the purposes of reviewing the Complaint, providing a response, protecting VIAINVEST's legal interests and fulfilling the requirements of applicable laws and regulations.

9.2. VIAINVEST ensures the protection of the information and personal data provided by the Complainant in accordance with applicable personal data protection laws and regulations and VIAINVEST's internal regulatory documents.

9.3. VIAINVEST retains information on received Complaints, documents related to the review of Complaints and responses provided to Complaints for 10 (ten) years from the date of completion of the Complaint review, unless there is another legal basis or a request from a competent authority to retain the relevant information for a longer period. Personal data shall not be retained longer than necessary for the purposes set out in these Rules and in applicable laws and regulations.

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