



CONSUMER COMPLAINT POLICY AND PROCEDURE

1. Purpose

This policy aims to ensure that consumer complaints are handled in a fair, transparent, and efficient manner, in accordance with the requirements set out by the financial regulator.

Athena is committed to delivering a seamless and efficient service experience through our Bitcoin Kiosks. To uphold this standard, we encourage consumers to reach out with any inquiries or grievances they may have. We will treat every complaint seriously and ensure fair and timely resolution.

2. Scope

This policy applies to all complaints made by consumers regarding any product or service provided by Athena Bitcoin ["Athena" or "Company"]. This policy will not cover any fraudulent activity or scam reported by the customers or law enforcement, as these matters are covered by the Anti-Fraud Policy.

2.1. Definitions

- Complaint: An expression of dissatisfaction by a consumer related to a product or service provided by Company, where a response or resolution is expected.
- Consumer: An individual or entity who uses or has used the products or services offered by Athena.

3. Policy Principles

- Fairness: Complaints will be handled in an impartial and objective manner.
- Transparency: Consumers will be provided with clear information on how their complaint will be handled.
- Confidentiality: Personal data collected during the complaint process will be kept confidential and used only for resolving the complaint.
- Efficiency: Complaints will be handled promptly as circumstances permit, with efforts made to resolve issues as quickly as possible.
- Compliance: The complaints process will comply with applicable regulatory requirements, including timelines, documentation, and reporting obligations, if any.



4. Channels of Communication

Consumers may submit complaints, by phone, via email, or through our online complaint form.

Customer Support line: Athena can be reached at: 312-690-4466.

Email Support: Customers may also contact us at support@athenabitcoin.com

Online Complaint form: Available at: <https://athena-usa.zendesk.com/hc/en-us/requests/new>

These services are available Monday to Friday from 8:00 AM to 8:00 PM CT, and Saturday and Sunday from 9:00 AM to 8:00 PM CT.

5. Complaint Handling Procedure

5.1. Step 1: Receiving Complaints

Information required in the Complaint:

- Consumer's full name and contact information
- Date, time, and location of the kiosk transaction
- Transaction ID (if applicable), phone number used at the machine or copy of the receipts, if available.
- Details of the complaint

Upon receipt, complaints will be logged into the customer's profile, noting the date of receipt, transaction reference number, general details of the complainant, the nature of the complaint, and the product or service involved.

5.2. Step 2: Investigation

- A designated employee or contractor will review the complaint thoroughly and impartially.
- If additional information is required from the consumer, the consumer will be contacted.
- The complaint will be investigated with input from relevant departments within the Company to ensure all aspects of the issue are reviewed.



5.3. Step 3: Resolution

Most phone inquiries can be resolved immediately. However, Athena may take between 24 to 72 hours to address certain issues. In cases where other departments are involved it may take up to 10 business days.

If a call is received after hours, the phone app used by the company will log the call, and the next available team member will proceed with a callback. If a complaint is received via email or through the online complaint form, the app will create a ticket, which will be notified to the Customer Service team. Similar to the callback process, the email will be responded according to the response time described above.

The response will include:

- The findings of the investigation.
- Any remedial action to be taken, if necessary, including a fee refund if applicable under Athena policy.
- An explanation of the consumer's rights to escalate the complaint to a financial ombudsman or regulator if they are not satisfied with the resolution.

5.4. Step 4: Escalation

- If the consumer is dissatisfied with the outcome of the complaint, or feels their concern has not been adequately addressed, they may request an escalation. The escalation process involves:
 - Contacting a supervisor: Consumers can request to have their case reviewed by a senior support agent or supervisor.
 - Final Review: In cases where the consumer remains dissatisfied, the complaint will be forwarded to our Compliance Department or the appropriate department for a final review.
- The Company will provide information on external dispute resolution options, if any, in accordance to the Terms of Service in effect at the time of the pertinent events and/or to the relevant financial regulator or ombudsman.



Additionally, all complaints received through the Consumer Finance Protection Bureau, the Better Business Bureau or other akin offices will be handled by the Customer Service Team in the same manner.

6. Record Keeping

- All complaints and associated correspondence will be documented and retained for at least five years.
- Records will include the nature of the complaint, the steps taken to resolve it, the final decision, and any remedial actions.

7. Reporting

- The company will provide periodic reports on complaints to the Board of Directors and relevant regulatory authorities, if and as required.
- Complaints will be categorized and analyzed to identify any systemic issues that may require changes to policies, procedures, or products.

8. Consumer Education

Information on how to make a complaint will be made readily available to consumers through various channels, including our website and customer service teams.

9. Continuous Improvement

- The company will regularly review this policy and the complaint handling process to ensure they remain effective and compliant with regulatory standards.
- Feedback from complaints will be used to improve our products, services, and processes.

10. Review of Policy

This policy will be reviewed annually or when significant regulatory changes occur.



CONTROL SECTION

Name	Drafted By	Revised by	Approval/Effective Date
Consumer Complaint Procedure and Policy	Compliance Department	Sam Nazzaro Antonio Valiente Rachele Andrejczak	October 7, 2024