



CUSTOMER SERVICE AND COMPLAINTS POLICY (SUMMARY)

Version 1.0 Effective Date: 18 October 2026

1. Purpose

- 1.1 This document summarises the Customer Service and Complaint Policy of Kay's Limited, the operator of KaysPay. The full policy is available to customers and regulators on request through any of the channels listed below.
- 1.2 Complaints are received, investigated and resolved fairly, promptly and without charge.

2. Submission of Complaints

- 2.1 A complaint may be submitted through any of the following channels:

Channel	Details	Availability
In-app support	The "Contact Support" option in the KaysPay application, which opens the official support chat on WhatsApp	Messages received 24 hours a day, 7 days a week
WhatsApp	+234 906 844 6111	Messages received 24 hours a day, 7 days a week
Email	support@kayspay.com.ng	Monitored daily
Post	Kay's Limited, Shop 25, Chindah Shopping Plaza, Rivers State University Main Gate, Port Harcourt, Rivers State, Nigeria. Attention: Complaints Officer	Business days

- 2.2 A complainant should provide their full name and registered contact details, the transaction reference, a description of the matter with the date and time, and any supporting evidence such as receipts or screenshots. A PIN, password or one-time code must never be provided.
- 2.3 Assistance is available to any customer who needs help in formulating a complaint, and a complaint will not be rejected solely because it lacks formality.

3. Handling Procedure

- 3.1 Each complaint is logged and assigned a reference number, and is acknowledged in writing within 24 hours, with the expected resolution timeline.
- 3.2 Urgent matters, including unauthorised transactions, are escalated immediately. Each complaint is investigated by a trained person who was not involved in the matter, where practicable, and further information may be requested from the complainant.
- 3.3 We aim to resolve each complaint within 14 calendar days of receipt and in any event within 30 calendar days, except where a regulatory requirement or an outstanding response from the complainant extends that period. Where more time is required, the complainant will be informed of the reasons and the new date.



- 3.4 The final response is in writing and states the outcome, the reasons for it, any remedial action taken and the complainant's right to escalate.

4. Target Resolution Times

Category	Examples	Target
Transaction disputes	Debited but service not delivered; double debit	5 business days
Wallet funding and transfers	Funds sent but not reflected in the wallet; delayed or failed transfer	5 business days
Service quality	Airtime or data not credited; electricity token not generated	5 business days
Unauthorised transactions	Fraudulent or unrecognised transactions	Immediate escalation; 10 business days
Crypto asset related	Delayed credit, network issues	10 business days, subject to blockchain confirmation
Identity verification	Failed verification, data mismatch, delay	7 business days
Data privacy	Unauthorised processing, consent issues, data breach concerns	7 business days
Fees and charges	Incorrect charges, undisclosed fees	5 business days
Staff or agent conduct	Misrepresentation, misconduct	10 business days

- 4.1 A complaint that requires reconciliation with a provider, or an anti-money laundering or fraud review, may take up to 15 business days, with interim updates to the complainant.

5. Escalation

- 5.1 A complainant who is dissatisfied with the final response may request a second-level review by the Compliance Officer within 10 business days of receiving it. The review will be concluded within 15 business days and the outcome communicated in writing.
- 5.2 A complainant may also refer the matter to the competent regulator, including:
- (a) the Federal Competition and Consumer Protection Commission (FCCPC), for consumer protection matters;
 - (b) the Nigeria Data Protection Commission (NDPC), for matters relating to personal data;
 - (c) the Central Bank of Nigeria (CBN), for payment system matters where applicable; and
 - (d) the Securities and Exchange Commission (SEC), for digital asset services within its scope.

6. Records and Continuous Improvement

- 6.1 Complaints are recorded in a register and reported to management on volumes and resolution times. Trends are reviewed quarterly to identify and correct root causes. Complaint records are retained for seven years and handled in accordance with our Privacy Policy.