

Virtu Financial Ireland Limited

Complaints Handling Procedure under MiCAR



**VIRTU**  
FINANCIAL



## Table of Contents

|  |   |
|--|---|
| 1 Description of the Complaints Handling Procedure under MiCAR | 3 |
| 2 MiCAR Complaints Template                                    | 4 |



# 1 Description of the Complaints Handling Procedure under MiCAR

Virtu Financial Ireland Limited ("VFIL", "the Firm", "we") has established a Complaints Management Procedure to ensure the prompt, fair and consistent handling of complaints received from its clients in relation to the crypto-asset services provided by the Firm under Regulation (EU) 2023/1114 (MiCAR).

A complaint is defined as any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a person about the provision, or failure to provide, a crypto-asset service or in the connection with such service, or a redress determination which alleges that the complainant has suffered (or may suffer) financial loss, material distress or inconvenience. It should also reflect an explicit or implicit expectation by a client that the Firm will take action to remediate them and or prevent recurrence.

The Firm will determine whether a complaint is admissible upon receipt. A complaint is deemed inadmissible where the scenarios described in the complaint do not meet the definition of a complaint.

The Firm applies the following general principles when handling complaints:

- Complaints are handled seriously, fairly and timely, and are received free of charge.
- Communications are conducted clearly and in plain English.
- Complaints should be submitted in writing electronically, or by post upon request.
- The Firm ensures confidentiality and security of all records and retains complaint data, using a secure electronic system, for a minimum of five (5) years, in line with regulatory obligations.

## How to file a complaint?

If you are dissatisfied with any aspect of the Firm's crypto-asset services and would like to submit a complaint, please address it to the Firm's Complaints Manager:

| Complaints Manager                             | Contact Information  |
|--|--|
| Fergus Rooney<br>VFIL Chief Compliance Officer | Post: 91/92 N Wall Quay, North Wall, Dublin, Ireland<br>Phone: +353-1-2466913<br>Email: <a href="mailto:frooney@virtu.com">frooney@virtu.com</a> |

Complaints can be submitted:

- Electronically (e.g. by email);
- Verbally (e.g. by phone);

You may also choose to submit a complaint by filling the MiCAR Complaints Template and submitting it electronically or by post.

Should you require communication in paper form, please let us know by contacting the Complaints Manager.

It is important that you describe your complaint as clear and detailed as possible and provide all the facts surrounding it, supported by relevant documents, where possible. This will help to ensure efficient, proper and prompt handling of the complaint. At least the following information should be provided to us:

- Full name and address;
- Description of relevant investment activity;
- Detailed nature of complaint (including description of any damage, loss or detriment);
- The exact time and date of complaint; and
- Proposed action to resolve it.

## Handling your complaint

Each complaint received will be resolved within the following timeframes.

Upon receipt of a complaint, we will acknowledge receipt of your complaint within five (5) business days, provide the relevant details, including contact details of the individual handling it and the timeframes, and confirm whether it is admissible. If a complaint is deemed inadmissible, we will also provide you with a clear explanation of the reason(s).

The Firm aims to investigate and resolve your complaint promptly. The Firm's Complaints Manager is responsible for handling your complaint on a day-to-day basis.

You will receive written update(s) at least every ten (10) business days on the progress of our investigation. We will also let you know if we need any additional information and/or any additional steps are required to be taken to handle your complaint.

We are committed to resolve your complaint within six (6) weeks of receipt of the complaint. If additional time is required, you will be notified with the anticipated timeframe and resolution.

Once the investigation is completed, we will provide you with a final response which will address, among other things, the outcome of our investigation and the decision taken.



## 2 MiCAR Complaints Template

The following is the template which VFIL's clients may use for the filing of complaints under MiCAR.

| Section   | Text |
|---|------|
| <b>1.a. Information about the complainant</b>   |      |
| Last name/Legal entity name:  |      |
| First name:   |      |
| EUID or if not available national Registration or ID number:  |      |
| Legal Entity Identifier (if available):   |      |
| Client reference (if available):  |      |
| Address (street, number, floor) (for legal entities, registered office):  |      |
| Postcode:   |      |
| City:   |      |
| Country:  |      |
| Telephone:  |      |
| Email address:  |      |
| <b>1.b. Contact details (if different from 1.a above)</b>   |      |
| Last name/Legal entity name:  |      |
| First name:   |      |
| Address (street, number, floor) (for legal entities, registered office):  |      |
| Postcode:   |      |
| City:   |      |
| Country:  |      |
| Telephone:  |      |
| Email address:  |      |
| <b>2.a. Information about the legal representative* (if applicable)</b>   |      |
| <i>*A power of attorney or other official document as proof of the appointment of the representative to be provided as an attachment to this form</i> |      |
| Last name/Legal entity name:  |      |
| First name:   |      |
| Registration number and LEI (if available):   |      |
| Address (street, number, floor) (For legal entities, registered office):  |      |
| Postcode:   |      |
| City:   |      |
| Country:  |      |



|  |  |
|--|--|
| Telephone:   |  |
| Email address:   |  |
| <b>2.b. Contact details (if different from 2.a above)</b>  |  |
| Last name/Legal entity name:   |  |
| First name:  |  |
| Address (street, number, floor) (For legal entities, registered office):   |  |
| Postcode:  |  |
| City:  |  |
| Country:   |  |
| Telephone:   |  |
| Email address:   |  |
| <b>3. Information about the complaint</b>  |  |
| 3.a. Full reference of the crypto-asset service to which the complaint relates (including name of the crypto-asset service provider, crypto-asset service reference number, or other references of the relevant transactions and other relevant details, if any) |  |
| 3.b. Description of the complaint's subject-matter*<br><i>*Please provide any documentation supporting the facts mentioned.</i>  |  |
| 3.c. Date(s) of the facts that have led to the complaint   |  |
| 3.d. Description of damage, loss or detriment caused (where relevant)  |  |
| 3.e. Other comments or relevant information (where relevant)   |  |
| In _____ (place) on _____ (date)   |  |
| <b>SIGNATURE</b>   |  |
| <b>COMPLAINANT/LEGAL REPRESENTATIVE OF THE COMPLAINANT</b><br>Documentation provided (please check the appropriate box):   |  |
| Power of attorney or other official document as proof of the appointment of the representative   |  |
| Copy of the contractual documents of the investments to which the complaint relates  |  |
| Other documents supporting the complaint:  |  |