

# COMPLAINTS HANDLING POLICY

## Bootyn.com digital content provider platform

Effective: April 7, 2026 | Version 1.2

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## 1. Introductory provisions

### 1.1 Purpose of the Complaints Handling Policy

The purpose of this Complaints Handling Policy is to define the procedures for handling, investigating, and responding to complaints, objections, and observations related to the operation and services of the Bootyn.com website (hereinafter: "Website" or "Platform") operated by SPONDEX LTD (registered office: Voukourestiou 25, NEPTUNE HOUSE, 1st floor, Flat/Office 11, Zakaki, 3045 Limassol, Cyprus; company registration number HE 490894; represented by Charalampos Lafazanis, Director; hereinafter: "Service Provider").

The Service Provider is committed to high-quality customer service and user satisfaction, and pays special attention to the efficient, fair and timely handling of complaints. This Policy defines the steps of the complaint handling process, the relevant deadlines, the responsibilities of organizational units involved, and the legal remedies available to complainants.

This Policy is to be read together with the General Terms and Conditions, the Privacy Policy, the Cookie Policy, the 18 U.S.C. §§ 2257 and 2257A Compliance Declaration and, for content providers, the Content Creator Agreement.

### 1.2 Applicable legislation

The Service Provider takes into account the following legislation in its complaint handling activities:

- Cypriot Consumer Protection Law (L.112(I)/2021);
- Cypriot Law on Certain Aspects of Information Society Services, in particular Electronic Commerce (L.156(I)/2004);
- Regulation (EU) 2016/679 (GDPR) and Cypriot Law 125(I)/2018;
- Regulation (EU) 2022/2065 (Digital Services Act, DSA), in particular Articles 16, 17, 20, 21, 22 and 24;
- Directive 2013/11/EU on alternative dispute resolution for consumer disputes, as transposed into national laws;
- Council Directive (EU) 2021/514 (DAC7) on the automatic exchange of information reported by digital platforms;
- Directive (EU) 2015/849 (as amended) on anti-money-laundering and counter-terrorist-financing;
- United States 18 U.S.C. § 2257 and 28 C.F.R. Part 75 record-keeping rules, in respect of complaints touching performer documentation;
- other applicable national consumer-protection legislation in the countries of residence of Users.

### 1.3 Definitions

- "Complaint" means any individual report concerning the Service Provider's activities, services, or complaint handling procedure in which the complainant objects to the Service Provider's conduct and formulates a specific demand. A request for general information, an opinion, or a position from the Service Provider does not constitute a complaint.
- "Complainant" means a natural or legal person who uses the Service Provider's service, or is the recipient of information or an offer related to the service, and addresses a complaint to the Service Provider.
- "Customer Service" means the organizational unit of the Service Provider that receives, registers, investigates and responds to complaints.
- "Complaint Handling Manager" means the person designated by the Service Provider who supervises complaint-handling processes, coordinates investigation, and ensures compliance with this Policy.
- "User" means a natural person who registers on the Website and uses the Website's services.
- "Content Provider" or "Model" means a User with special permissions who publishes digital content for sale through the Platform under a separate Content Creator Agreement.
- "Shufti Pro" means the external identity-verification service used by the Platform, which performs identity and age verification of Content Providers and other Users using AI-based technology.
- "DSA" means Regulation (EU) 2022/2065 of the European Parliament and of the Council on a Single Market for Digital Services.

- "Statement of Reasons" means the statement issued under Article 17 of the DSA explaining a content-moderation decision.

## 1.4 Scope of the Complaints Handling Policy

- Material scope: all services provided by the Service Provider, the operation of the Website, and communication between the Service Provider and Users or Content Providers.
- Personal scope: all employees, contractors and associates of the Service Provider, as well as Users and Content Providers using the services.
- Temporal scope: this Policy is valid from the date of entry into force until revocation or entry into force of a new version.
- Territorial scope: this Policy applies throughout the entire operational area of the Platform without geographical restrictions, taking into account local legal specificities.

## 2. Complaints handling principles

### 2.1 Transparency and accessibility

The Service Provider's complaint-handling system is transparent and easily accessible to Users:

- the Service Provider publishes this Policy and possible methods of complaint submission in an easily findable location on the Platform footer;
- every step of the complaint-handling process is documented and traceable;
- Users receive clear information about the receipt of their complaint, its investigation, and the decision;
- complaint-handling information is formulated in simple, understandable language.

### 2.2 Efficiency and timeliness

- incoming complaints are recorded in the complaint-handling system without undue delay;
- complaints are processed in the shortest reasonable time;
- the Service Provider gathers all information necessary for a thorough investigation;
- simple complaints are resolved immediately where possible;
- the Service Provider adheres to the response deadlines set out in Section 4.5.

### 2.3 Objectivity and fairness

- every complaint is investigated with equal attention and thoroughness;
- complaints are handled objectively and free from prejudice, in a non-arbitrary and non-discriminatory manner, in accordance with Article 20(4) of the DSA;
- decisions are based on facts and evidence;
- the legitimate interests of both the complainant and the Service Provider are considered;

- complainants do not suffer any disadvantage merely for filing a complaint.

## 2.4 Confidential handling

- personal data related to complaints is handled confidentially;
- data is used only to the extent necessary for investigating the complaint;
- staff involved in complaint handling are bound by written confidentiality obligations;
- complaint-handling documentation is stored securely;
- identity data processed via Shufti Pro is protected by the additional safeguards described in the Privacy Policy.

## 2.5 Continuous improvement

- the Service Provider analyses incoming complaints to identify recurring issues;
- complaint experiences feed into service and process improvements;
- regular training is provided to complaint-handling staff;
- complaint-handling procedures are periodically reviewed and updated.

# 3. Methods of submitting complaints

## 3.1 Channels

Users may submit complaints through the following channels:

- by email to support@bootyn.com (general complaints), with the word "COMPLAINT" in the subject line;
- through the "Support" or "Help Request" function in the User's account, which feeds directly into the complaint-handling system;
- to legal@bootyn.com for legal complaints, including copyright/DSA Article 16 notices, data-protection requests, and 2257-related issues;
- to finance@bootyn.com for billing, settlement, payout and refund complaints;
- to legal@bootyn.com for any complaints related to AML/STR matters or sanctions screening;
- by post addressed to: SPONDEX LTD — Complaints, Voukourestiou 25, NEPTUNE HOUSE, 1st floor, Flat/Office 11, Zakaki, 3045 Limassol, Cyprus.

## 3.2 Required information

To enable an effective investigation, the complaint should include:

- data necessary for identifying the complainant (legal name, username on the Platform, email address);
- the subject and a detailed description of the complaint;

- any documents and evidence the complainant wishes to present;
- the resolution expected by the complainant;
- for complaints related to Shufti Pro verification, the date and reference number of the verification;
- a valid authorization where the complainant is represented by a third party.

Where the complaint is incomplete, the Service Provider contacts the complainant to obtain the missing information. The time required for supplementation does not count towards the investigation deadline.

## 4. Complaint handling process

### 4.1 Receipt and registration

- Receipt: every incoming complaint receives a unique identifier that allows for later retrieval and tracking.
- Acknowledgment of receipt: the Service Provider acknowledges receipt within twenty-four (24) hours where the complaint is submitted electronically, and within seventy-two (72) hours for postal complaints.
- Registration: each complaint is recorded in the centralized complaint-handling system, including identifier, complainant data, date and channel of receipt, subject and content, list of attachments, complaint category (technical, payment, content, data protection, Shufti Pro verification, DSA notice, 2257 record, AML, sanctions, other), and priority level (normal, urgent, critical).
- Categorization and prioritization: based on the nature and severity, the complaint is assigned a category and priority that influence the investigation method and response deadline.

### 4.2 Investigation

- Assignment: based on category, the responsible expert or team is designated.
- Information gathering: the responsible handler reviews the complainant's account data and activity, previous communications and complaints, internal logs and records, consults Shufti Pro support where relevant, and requests further information from the complainant where necessary.
- Analysis: the handler analyses the validity of the complaint and the appropriate resolution, taking into account the time of contractual performance (successful payment and access opening) for digital-content disputes.
- Internal consultation: complex or precedent-setting complaints are consulted with relevant departments or the legal team.
- Decision: the complaint is upheld and the requested action taken, partially upheld with a compromise, or rejected with reasons.

- Human review: where automated tools have contributed to the original decision being complained of, the review is performed by qualified human staff and not solely on the basis of automated means, in accordance with Article 20(6) of the DSA.

### 4.3 Response

- Form: responses are issued in writing and include the unique identifier of the complaint, a summary of the subject, the findings of the investigation, the decision and its reasoning, the actions taken or planned, and information about further legal remedies.
- Channel: the response is delivered through the same channel as the complaint, unless the complainant requests otherwise.
- Statement of Reasons: where the complaint relates to a content-moderation decision under Article 17 of the DSA, the response incorporates a Statement of Reasons in the form required by that Article.
- Feedback request: a brief satisfaction questionnaire may be attached to the response.
- Documentation: a copy of the response is stored in the complaint-handling system together with the closure record.

### 4.4 Special complaint-handling procedures

- Data-protection complaints: investigated with the involvement of the Data Protection Officer; logged in a separate registry; addressable to [legal@bootyn.com](mailto:legal@bootyn.com).
- Shufti Pro verification complaints: handled by Customer Service in cooperation with Shufti Pro support.
- Payment, billing and refund complaints: investigated by the finance team via [finance@bootyn.com](mailto:finance@bootyn.com); given priority due to the marketplace settlement model.
- Technical complaints: investigated by the engineering team; immediate intervention is possible depending on severity.
- Content-moderation complaints: routed through the DSA-specific procedure in Section 5; the head of moderation or the legal team is involved as required.
- Copyright and DSA Article 16 notices: handled at [legal@bootyn.com](mailto:legal@bootyn.com) under the Article 16 DSA notice-and-action procedure described in the General Terms and Conditions. Notices submitted in DMCA form are accepted but processed under the DSA Article 16 procedure; the Service Provider does not maintain a Designated Agent registered with the United States Copyright Office under 17 U.S.C. § 512(c)(2).
- AML, sanctions and STR-related complaints: handled by [legal@bootyn.com](mailto:legal@bootyn.com); nothing in this Policy obliges the Service Provider to disclose information that would amount to tipping off under Cypriot AML legislation.
- 2257-related complaints: handled by [legal@bootyn.com](mailto:legal@bootyn.com) in coordination with the Custodian of Records identified in the 18 U.S.C. §§ 2257 and 2257A Compliance Declaration.

- CSAM (child sexual abuse material) reports: treated as critical-priority; content is preserved as evidence and reported to competent law-enforcement authorities and, where applicable, to the National Center for Missing & Exploited Children (NCMEC).
- Trusted-flagger notices: notices submitted by entities awarded trusted-flagger status under Article 22 of the DSA are processed with priority over other notices in the same category.
- Multi-area complaints: where a complaint affects multiple areas, the Complaint Handling Manager coordinates the investigation.

## 4.5 Deadlines and timeframes

The Service Provider applies the following service-level targets:

- Acknowledgment of receipt: within twenty-four (24) hours for electronic submissions; within seventy-two (72) hours for postal submissions.
- Investigation and response — simple complaints: within seven (7) business days of receipt.
- Investigation and response — complex complaints: within fifteen (15) business days of receipt.
- Shufti Pro verification complaints: within five (5) business days.
- Data-protection requests under Articles 15–22 GDPR: within thirty (30) calendar days, extendable by up to two (2) further months for complex requests under Article 12(3) GDPR.
- Extremely complex complaints: where the investigation cannot be completed within fifteen (15) business days, the complainant is informed within that period of the reason for delay and the expected response date, which shall not exceed thirty (30) business days from receipt.

Deadlines may be extended where the complainant has not provided adequate information, where third-party involvement is necessary (such as Shufti Pro), where extremely complex issues are involved, or in case of force majeure. In such cases the complainant is informed of the reason and the expected response date.

## 5. DSA-specific complaint handling (content-moderation decisions)

### 5.1 Internal complaint-handling system (Article 20 DSA)

Where the Service Provider takes a content-moderation decision (removing or disabling access to content, restricting visibility, suspending or terminating monetization, or suspending or terminating an account), the affected User has the right to lodge a complaint through the internal complaint-handling system available in their account, free of charge, for at least six (6) months from the date of the decision.

Such complaints are handled in a timely, non-discriminatory, diligent and non-arbitrary manner, and decisions taken on the basis of complaints are reviewed by qualified human staff and not solely on the

basis of automated means. Where a complaint contains sufficient grounds to consider that the original decision was unfounded, the Service Provider reverses the decision without undue delay.

## **5.2 Statement of Reasons (Article 17 DSA)**

The Service Provider issues a Statement of Reasons setting out at least:

- the type of restriction imposed and, where relevant, its territorial scope and duration;
- the facts and circumstances relied on, including, where relevant, whether the decision was taken following a notice submitted under Article 16 DSA or pursuant to a voluntary investigation;
- where applicable, information on the use of automated means in taking the decision;
- the legal or contractual ground for the decision, including reference to the specific clause where the ground is contractual;
- information on the redress mechanisms available, including the internal complaint-handling system and out-of-court dispute settlement under Article 21 DSA.

## **5.3 Out-of-court dispute settlement (Article 21 DSA)**

Affected Users have the right to select any out-of-court dispute settlement body certified under Article 21 of the DSA in order to resolve disputes relating to the decisions referred to in Section 5.1, including disputes that have not been resolved through the internal complaint-handling system. The selection of an out-of-court dispute settlement body is without prejudice to the User's right to initiate, at any stage, judicial proceedings to contest the relevant decision.

## **5.4 Notice-and-action mechanism (Article 16 DSA)**

Independently of complaints lodged by affected Users, any individual or entity may notify the Service Provider of the presence of allegedly illegal content on the Platform via the procedure described in the General Terms and Conditions and at [legal@bootyn.com](mailto:legal@bootyn.com). The Service Provider acts on valid notices in a timely, diligent, non-arbitrary and objective manner.

# **6. User satisfaction management**

## **6.1 Collection of user feedback**

- Post-complaint satisfaction survey: a short questionnaire is sent to the complainant after each closed complaint.
- Periodic user surveys: comprehensive satisfaction surveys are conducted at least once a year.
- Continuous feedback: a "Feedback" button is available on the Platform.
- Social-media monitoring: the Service Provider monitors public feedback and responds proactively where appropriate.

## 6.2 Continuous improvement

- Trend analysis: quarterly analysis of complaints to identify recurring issues.
- Development priorities: feedback feeds into product-development plans.
- Process improvement: the complaint-handling process is reviewed regularly.
- Training: regular staff training based on complaint experiences.
- Pre-release testing: user testing is conducted before significant feature launches.

## 6.3 Satisfaction measurement

- quarterly satisfaction index from post-complaint surveys;
- annual comprehensive satisfaction survey;
- Net Promoter Score (NPS) tracking;
- targeted surveys for specific services or features.

# 7. Handling of Content Provider complaints

## 7.1 Types of Content Provider complaints

- Monetization complaints: revenue calculation, platform-fee deductions, payout delays, chargeback offset — prioritized due to the marketplace settlement model.
- Content-moderation complaints: removal, restriction, demonetization or recategorization — handled under the DSA-specific procedure in Section 5.
- Visibility complaints: ranking, recommendation and display matters.
- Technical complaints: upload, editing or playback issues.
- Contractual disputes: interpretation or application of the Content Creator Agreement.
- User-related complaints: harassment, abuse or non-paying followers.
- Shufti Pro verification complaints: technical or administrative problems with KYC.
- 2257-related complaints: performer documentation, custodian access, secondary-producer issues.

## 7.2 Special handling of Content Provider complaints

- Dedicated contacts: VIP-tier Content Providers are assigned a dedicated point of contact familiar with their profile and history.
- Expedited procedure: complaints affecting revenue generation are investigated on an expedited basis.
- Proactive communication: regular updates are provided to the Content Provider during the investigation.
- Independent review for moderation: complaints concerning content-moderation decisions receive an independent human review under Article 20 of the DSA.

- Tailored solutions: solutions are adapted to the Content Provider's specific situation where reasonably possible.
- Tighter deadlines: the Service Provider works towards tighter response deadlines on revenue-affecting matters.

### **7.3 Resolution of Content Provider disputes**

- Two-tier review: complex Content Provider disputes are subject to a two-tier review, with management-level review at the second tier, in addition to the rights granted under Section 5.
- Mediation: for disputes related to the Content Creator Agreement, the Service Provider may propose external mediation.
- Contractual disputes: disputes about the Content Creator Agreement are handled with the legal team's involvement, taking into account the Content Provider's independent-contractor status.
- Revenue disputes: monthly settlements are processed transparently in line with the marketplace model and the commission structure in the Content Creator Agreement.
- Pending payments: in case of dispute, the disputed amount is held separately while undisputed amounts continue to be paid; DAC7 reporting obligations continue to be fulfilled.

## **8. Dispute resolution and legal remedies**

### **8.1 Internal review**

If the complainant is not satisfied with the response to their complaint, they may request an internal review:

- Review request: the complainant may request review of the decision within thirty (30) calendar days of receiving the response (or, for content-moderation decisions, within the six-month window provided by Article 20 of the DSA), specifying the contested points and their reasoning.
- Management-level review: the request is examined jointly by the Complaint Handling Manager and the head of the relevant area.
- Independent opinion: where appropriate, an expert or manager not involved in the original decision is consulted.
- Deadline: the Service Provider responds to the review request within fifteen (15) business days.
- Final internal decision: the review outcome is the final internal decision, after which the complainant may use external remedies.

### **8.2 Alternative dispute resolution**

Before resorting to judicial proceedings, the Service Provider supports alternative dispute resolution:

- DSA Article 21 out-of-court dispute settlement bodies, in respect of content-moderation disputes.
- Consumer ADR entities certified under Directive 2013/11/EU as transposed into national law. EU consumers may consult the European Commission's list of certified ADR bodies at <https://consumer-redress.ec.europa.eu/dispute-resolution-bodies>. (The EU Online Dispute Resolution Platform previously established under Regulation (EU) No 524/2013 was discontinued on 20 July 2025 by Regulation (EU) 2024/3228 and is no longer available.)
- Mediation: involvement of an independent third party to mediate.
- Cypriot consumer-protection authorities: complainants may contact the Cyprus Consumer Protection Service of the Ministry of Energy, Commerce, Industry and Tourism, or other competent Cypriot authorities.
- Voluntary commitments: in case of serious and well-founded complaints, the Service Provider may offer voluntary commitments to resolve the issue without lengthy proceedings.

### 8.3 Appeal to national authorities

- Consumer-protection authorities: the complainant may file a report with the consumer-protection authority of their country of residence.
- Data-protection authorities: data-protection complaints may be addressed to the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus (Iasonos 1, 1082 Nicosia, [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)) or to the supervisory authority of the User's habitual residence.
- Digital Services Coordinators: in EU Member States, complaints regarding DSA compliance may be addressed to the national Digital Services Coordinator.
- AML supervisor: complaints regarding AML practices may be addressed to MOKAS (Unit for Combating Money Laundering of the Republic of Cyprus).
- Financial-supervisory and electronic-commerce authorities: as competent under applicable law.

### 8.4 Judicial enforcement

If the foregoing methods do not lead to resolution, the complainant may seek judicial remedies:

- Competent court: under the General Terms and Conditions, the courts of the Republic of Cyprus have jurisdiction, with priority of the Limassol District Court, except where mandatory provisions on consumer jurisdiction grant the consumer the right to sue in the courts of their habitual residence.
- Small claims procedures: simplified procedures may be available for lower-value disputes.
- Legal aid: the complainant is informed of legal-aid options available under the law of their place of residence.

## 9. Organizational structure of complaint handling

### 9.1 Customer Service tasks and responsibilities

- Receipt of complaints: receives incoming complaints across all channels and records them in the complaint-handling system.
- Resolution of simple complaints: authorized to resolve simple, common complaints based on documented protocols.
- Routing: forwards more complex complaints to the appropriate department — legal matters to [legal@bootyn.com](mailto:legal@bootyn.com), financial matters to [finance@bootyn.com](mailto:finance@bootyn.com).
- Communication: maintains contact with the complainant throughout the process.
- Final response: delivers the final response prepared on the basis of the competent department's findings.
- Follow-up: performs satisfaction follow-up after closure.

### 9.2 Role of the Complaint Handling Manager

- Process oversight: ensures proper operation of complaint-handling processes and adherence to deadlines.
- Coordination: coordinates departments for complex complaints.
- Escalation: handles escalated complaints and review requests.
- Quality assurance: regularly checks the quality and consistency of complaint handling.
- Training: ensures appropriate training of Customer Service and other participating staff.
- Reporting: prepares regular reports for management on complaint-handling statistics and trends, and contributes to the DSA Article 24 annual transparency report.
- Policy development: proposes amendments to this Policy and to internal procedures.

### 9.3 Staff training

- Onboarding training: every new employee receives detailed training on this Policy and on internal procedures.
- Communication training: difficult-conversation and conflict-management training.
- Specialist training: department-specific training on common complaint types, marketplace specifics, Shufti Pro operations, DSA workflows and 2257 documentation.
- Continuing education: at least twice a year on regulatory changes and new procedures.
- Case discussions: regular case reviews to share experience and develop best practice.
- Performance evaluation: complaint-handling quality forms part of staff performance evaluation.

## 10. Complaint registration, documentation and transparency

## 10.1 Content of the complaint registry

- Identification: unique identifier, date of receipt, channel, category.
- Complainant data: name, username, email address, user category (Standard / Premium / Content Provider).
- Complaint content: detailed description, affected services, attached documents.
- Shufti Pro verification data, where relevant.
- Investigation data: responsible handler, departments involved, investigation steps and dates.
- Decision and actions taken, with dates.
- Response data: content of the response, date and channel of delivery.
- Timeline: chronological tracking of the entire process.
- Related documents: correspondence, minutes and notes.
- Follow-up: satisfaction-measurement results and any further developments.

The registry supports filtering, grouping and analysis of complaints across multiple dimensions and feeds into the DSA Article 24 annual transparency report and into Article 15 transparency reporting.

## 10.2 Document retention

- Retention period: complaint-related documents are retained for five (5) years from complaint closure, except where a longer retention is required by law (for example, for accounting, AML or 2257 records).
- Storage: documents are stored electronically in the complaint-handling system with appropriate backups.
- Paper documents: paper documents are digitized; originals are kept in secure storage.
- Disposal: at the end of the retention period, documents are disposed of in accordance with data-protection rules.

## 10.3 Statistical analysis and transparency reporting

- Monthly internal report: number, type and status of complaints.
- Quarterly analysis: detailed analysis of trends, recurring issues and successful resolutions.
- Annual review: comprehensive evaluation of the complaint-handling system.
- Ad-hoc reports: targeted analyses of specific issues.
- Management dashboard: real-time dashboard of key metrics.
- DSA Article 24 transparency report: annual public report including, among other items, the number of orders received from Member-State authorities, the number of notices submitted under Article 16 DSA, the number of own-initiative content-moderation decisions, the use of automated means in moderation, the number and outcome of internal complaints under

Article 20 DSA, and the number of disputes submitted to out-of-court dispute settlement bodies under Article 21 DSA.

## 11. Data protection aspects

### 11.1 Data processing related to complaint handling

- Legal basis: legitimate interest in fraud prevention, dispute resolution and quality assurance (Article 6(1)(f) GDPR), and compliance with legal obligations (Article 6(1)(c) GDPR).
- Purpose limitation: personal data is processed solely for investigating and responding to complaints.
- Data minimization: only the personal data strictly necessary for complaint handling is processed.
- Data security: appropriate technical and organizational measures protect complaint-related personal data.
- Retention: personal data is stored only for the period set out in Section 10.2.
- Access: only staff directly involved in complaint handling may access complaint-related personal data.
- Special-category data: where the complaint touches data revealing sex life, sexual orientation or biometric data (in particular for Shufti Pro), the additional safeguards under Article 9 GDPR apply, as detailed in the Privacy Policy.

Detailed data-processing information is published in the Platform's separate Privacy Policy.

### 11.2 Data-subject rights during complaint handling

- Right to be informed: the complainant is informed of personal-data processing upon receipt of the complaint.
- Right of access: the complainant may request access to their personal data processed in connection with the complaint.
- Right to rectification: inaccurate or incomplete data may be rectified on request.
- Right to erasure: subject to retention obligations under law.
- Right to restriction: in cases provided by Article 18 GDPR.
- Right to object: where processing is based on legitimate interest.
- Right to data portability: where processing is based on consent or contract and is carried out by automated means.

Data-subject requests can be addressed to [legal@bootyn.com](mailto:legal@bootyn.com) and are processed under the Privacy Policy.

### 11.3 Data security measures

**Technical measures:**

- access to the complaint-handling system is protected by strong passwords and multi-factor authentication;
- personal data is transmitted through encrypted channels;
- automatic logging of all data access;
- regular encrypted backups;
- antivirus and firewall systems.

**Organizational measures:**

- documented access-rights management;
- written confidentiality obligations for staff involved in complaint handling;
- regular data-protection training;
- documented data-breach incident handling procedure;
- data-security audits.

Personal-data breaches are handled under the procedure set out in the Privacy Policy and, where required, notified to the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus within seventy-two (72) hours of becoming aware (Article 33 GDPR), and to affected data subjects where the risk is likely to be high (Article 34 GDPR).

## 12. Final provisions

### 12.1 Modification of the Complaints Handling Policy

**Reasons for modification:**

- legislative changes;
- changes to services provided by the Service Provider;
- improvement of complaint-handling processes;
- organizational changes;
- changes to Shufti Pro or other external service providers.

Modifications are notified by publication on the Platform; significant changes are also notified by email to registered Users. Modifications enter into force on the date of publication, with at least fifteen (15) days' advance notice for substantive changes. Previous versions remain available on request.

### 12.2 Entry into force

This Complaints Handling Policy enters into force on April 7, 2026, and remains valid until revoked or replaced. Upon entry into force, previously issued policies on this subject lose their validity. The provisions of this Policy apply to complaint-handling procedures initiated after the date of entry into force; for ongoing cases, the complainant may request application of the new rules where they are more favourable.

**Dated: Limassol, April 7, 2026**

SPONDEX LTD (Company No. HE 490894)

Charalampos Lafazanis, Director

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