



BLACKMOON

# COMPLAINTS PROCEDURE

This document was last updated on January 1, 2019.

## 1. INTRODUCTION

BMC Group SPC Ltd (“**Blackmoon**”) is an exempted segregated portfolio company limited by shares, incorporated in the Cayman Islands on 18 January 2018, registration number 331901, registered office at Harneys Fiduciary (Cayman) Limited, 4th Floor, Harbour Place, 103 South Church Street, P.O. Box 10240, Grand Cayman, KY1-1002, Cayman Islands. The services of Blackmoon Platform and the website [www.blackmoonplatform.com](http://www.blackmoonplatform.com) are provided by BMC Group SPC Ltd.

## 2. SCOPE OF THE PROCEDURE

The Complaints Handling Procedure sets out the process for handling complaints from the customers of Blackmoon Platform. The complaints may be related to the quality of services received, or to the processing of personal data, and shall be handled by different personnel depending on the nature of the complaint.

### 3. DEFINITIONS/INTERPRETATION OF TERMS:

**3.1. Complainant:** any person, natural or legal, who has read, agreed with and accepted all the terms and conditions contained in the Terms of Use without modifications, has registered on the Blackmoon Platform and lodged the complaint;

**3.2. Complaint:** an expression of dissatisfaction by a Client addressed to Blackmoon regarding the provision of services provided by Blackmoon Platform or regarding the processing of personal data.

**3.3. Data Subject:** any person, natural or legal, who has accepted the Terms of Use of Blackmoon Platform and provided personal data for registration purposes.

### 4. NATURE OF COMPLAINTS

#### 4.1. Blackmoon Platform Services

The customers may complain to Blackmoon about the following types of services or activities on the Blackmoon Platform:

- access to information on the Platform
- any stage of the token purchase process, including deposit and withdrawal
- quality of transaction execution
- handling of the complaint
- appeal against any decision made following a complaint

#### 4.2. Data Processing Complaints

Data subjects are able to complain to Blackmoon about:

- how their personal data has been processed
- how their request for access to data has been handled
- how their complaint has been handled
- appeal against any decision made following a complaint

### 5. COMPLAINTS HANDLING PROCEDURE

**5.1.** Complaints need to be sent by email at [compliance@blackmoonplatform.com](mailto:compliance@blackmoonplatform.com) if related to the Platform Services or [dpo@blackmoonplatform.com](mailto:dpo@blackmoonplatform.com) if related to personal data.

**5.2.** Blackmoon will address the complaint within 7 days from receipt and provide you with a written acknowledgement and unique reference number for your complaint.

**5.3.** We will carry out an impartial review of the complaint with a view to understanding what did or did not happen and assess whether we have acted fairly within our rights and have met our contractual and other obligations;

**5.4.** We will keep you updated on the progress of your complaint and a full written response will be provided to you no later than eight weeks from the date that we received the complaint;

**5.5.** If the investigation is not completed within 30 days, Blackmoon will inform the you of such fact within seven business days from the end of that period;

**5.6.** When providing a final decision that does not fully satisfy your demand, you have the right to appeal your decision (in case of personal data complaints).

## **6. RESTRICTIONS**

**6.1.** Complaints are accepted only from registered users that have agreed to the Blackmoon Platform Terms of Use.

**6.2.** Abusive language or insults towards Blackmoon employees or directors will not be tolerated. Blackmoon reserves the right to stop the communication on a complaint that becomes abusive or inappropriate.

### ***Disclaimer:***

*“Due to the fact that cryptocurrency markets are unregulated and decentralized, the provision of our services is not governed by any specific regulatory framework or investor protection rules. Investment in cryptocurrencies carries high degree of risk and volatility and is not suitable for every investor; therefore, you should not risk the capital you cannot afford to lose. Please consult an independent professional financial or legal advisor to ensure the product meets your objectives before you decide to invest. Under no circumstances shall Blackmoon have any liability to any person or entity for (a) any loss or damage in whole or part caused by, resulting from, or relating to any transactions related to the asset tokens or (b) any direct, indirect, special, consequential or incidental damages whatsoever.”*