

Information on the complaints handling procedure

Notice regarding authorisation status

Clovr Labs, S.L. has submitted to the Comisión Nacional del Mercado de Valores (CNMV) an application for authorisation as a crypto-asset service provider in accordance with Regulation (EU) 2023/1114 (MiCA).

As at the date of this publication, Clovr Labs, S.L. is not authorised as a crypto-asset service provider and does not provide crypto-asset services to clients.

The documents in this section describe the policies, terms and warnings that will apply from the commencement of the provision of the services, once authorisation has been obtained and registration in the relevant register has been effected. Their advance publication reflects a transparency criterion and does not constitute an offer, an invitation to contract or the marketing of crypto-asset services.

Information for clients, users and prospective clients of Clovr Labs, S.L. (ElenPay)

Regulatory basis: Article 71 MiCA and Commission Delegated Regulation (EU) 2025/294

Clovr Labs, S.L. makes available to its clients, users and prospective clients a free-of-charge, accessible and transparent procedure for submitting and handling complaints relating to the crypto-asset services provided by Clovr Labs.

1. Who may complain and on what matters

For these purposes, a complaint is a statement of dissatisfaction addressed to Clovr Labs in relation to the provision of one or more crypto-asset services. It may be submitted by the person concerned or by their duly accredited representative, in relation to:

1. Custody and administration of crypto-assets on behalf of clients.
2. Transfer of crypto-assets on behalf of clients.
3. Any other crypto-asset service actually provided by Clovr Labs.
4. Contractual or pre-contractual rights, transparency, client protection, good practice or professional diligence relating to those services.

2. Free-of-charge submission and available channels

The submission and handling of a complaint are free of charge. The template in Annex I may be used on a voluntary basis; failure to use it will not be a ground for inadmissibility where the complaint contains sufficient information.

Email: sac@clovrlabs.com

Online form: available in the client's private area (back-office)

Post: Customer Service of Clovr Labs, S.L., Avenida de la Generalitat 24, 08840 Viladecans (Barcelona), España

Complaints may be submitted by electronic means or on paper.

3. Languages

You may submit your complaint in any of the languages that Clovr Labs uses to market its services or to communicate with you, as well as in the official languages of the home Member State and of the host Member States which are also official languages of the European Union. The reply will be issued in the same language as that used by the complainant, where it is one of the above.

4. Information to be included

5. The identity of the complainant and their contact details.
6. Where applicable, the identity of the representative and the document evidencing the representation.
7. The crypto-asset service and the transaction or transactions concerned, together with their references.
8. A clear account of the facts and of the relevant dates.
9. The request or remedy sought.
10. Any available supporting documentation.
11. Place, date and signature where a physical medium is used.

5. Admissibility

Customer Service will verify that the complaint may be handled and that it is sufficiently clear and complete. The conditions of admissibility will be fair and reasonable and will not unduly restrict the right to complain.

A complaint may be held inadmissible where:

12. The subject matter is unrelated to services provided by, used from or requested of Clovr Labs.
13. The status of client, user, prospective client or representative, or a legitimate interest relating to the services, is not evidenced.
14. The same facts, parties and claim are the subject of judicial, administrative or arbitral proceedings that are incompatible with internal handling.
15. The complaint reproduces another complaint already resolved without adducing new facts or documentation.
16. The claim is submitted after expiry of the applicable statutory time limit.
17. The matter relates exclusively to a discretionary commercial decision and no regulatory or contractual breach, undue discrimination or malpractice is alleged.

Where the complaint is considered inadmissible, Clovr Labs will communicate a clear explanation of the grounds without undue delay.

6. Stages and timetable of the procedure

Step	Stage	Action	Time limit
1	Receipt and registration	Registration in the secure system, allocation of a unique reference and retention of the date of receipt.	Without undue delay.
2	Acknowledgement and admissibility	Confirmation of receipt, admissibility, contact person or department, follow-up channel and maximum time limit.	Maximum 5 business days from receipt.
3	Clarification or remediation of deficiencies	Where necessary information is missing, it will be requested without delay. No information already held by Clovr Labs, or which it is required to retain, will be requested.	10 calendar days to reply. The maximum time limit for the decision is not suspended.
4	Investigation	Impartial gathering and examination of the information; requests for information from the areas involved; information to the complainant on any further steps.	The internal areas will reply within a maximum of 15 calendar days; the investigation will be comprised within the overall time limit.
5	Decision and communication	Reasoned decision on all points, consistent with similar cases and communicated in writing on a durable medium.	Without undue delay and, in any event, a maximum of 2 months from receipt.
6	Implementation and closure	Performance of corrective or compensatory measures, recording of the outcome and traceable closure of the file.	Without undue delay and in accordance with the time limit stated in the decision.

Exceptional circumstances. Where it is not possible to decide within the applicable time limit, Clovr Labs will inform the complainant of the reasons for the delay and of the date by which the decision is expected.

7. Content and form of the decision

In its reply to a complaint, Clovr Labs:

18. Will address all the points raised and set out the reasons and grounds for the outcome.
19. Will be consistent with earlier decisions in similar cases; any difference will be objectively justified.
20. Will state whether the complaint is upheld, rejected or closed and, where applicable, the corrective or compensatory measures.

21. Will be communicated in plain and simple language, in writing and on a durable medium, by electronic means or, if so requested, on paper.
22. Where the request is not satisfied in whole or in part, will provide information on the avenues of redress available.

8. Avenues of redress

If you are not satisfied with the decision, or you do not receive a reply within the applicable time limit, you may have recourse to the judicial and out-of-court avenues available and, depending on the subject matter, to the competent supervisory authority.

Crypto-asset services subject to MiCA: Comisión Nacional del Mercado de Valores (CNMV), C/ Edison 4, 28006 Madrid

Information and official channels: www.cnmv.es/portal/inversor/reclamaciones

23. The Agencia Española de Protección de Datos (Spanish Data Protection Agency) may be competent in respect of data protection matters.
24. The Banco de España (Bank of Spain) may be competent where the complaint relates to payment services falling within its remit.

The competence and the admission requirements of each body will be determined in accordance with the specific nature of the complaint and with the legislation applicable at the time of its submission.

9. Recording, security and data protection

Clovr Labs will record all complaints and the measures adopted in a secure electronic system that makes it possible to reconstruct the stages of the file, to verify amendments and to preserve the availability, authenticity, integrity and confidentiality of the information.

The records will be retained for five years and, where the competent authority so requests before the end of that period, for up to seven years, without prejudice to any other applicable statutory time limits.

The processing of personal data will be limited to what is necessary in order to handle the complaint, comply with legal obligations, respond to requests from the supervisor and improve the service.

10. Available documents

25. Client protection regulations and the complaints procedure in force.
26. Standard template for the submission of complaints (Annex I).
27. Data protection information applicable to the handling of complaints.