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- CONSUMER
- BUSINESS
- English Hindi Bengali Gujarati Marathi Tamil Telugu Kannada Malayalam

Customer Grievance Redressal Mechanism

The TranServ Limited ("TranServ") as a service organization, imparting good customer service and enhancing level of customer satisfaction is our prime concern.

The TranServ grievance redressal policy aims at ensuring prompt redressal of customer complaints and grievances. It also deals with the issues relating to services provided by the outsourced agency.

In order to make Grievance Redressal Mechanism more meaningful and effective, a structured system has been built up towards such an end.

We have a dedicated email id to lodge any grievance by any customer if they want to do so - grievance@dhani.com.

1. Internal machinery to handle customer complaints/ grievances:

1.1 Complaint Registration:

A customer may lodge a complaint on ODR, Email, phone, chat and by courier, if he/she is not satisfied with the services provided by TranServ.

Whenever a complaint is received, the sender receives a response back either in the same mode or by email acknowledging his/her complaint.

Customers may further escalate concern as per matrix given in Annexure - Escalation Grid.

Arrangements for receiving complaints and suggestions are given hereunder.

These mechanisms are dedicated for redressing our customer complaints, providing online resolution wherever possible, and capturing valuable feedback regarding our services.

On receiving customer feedback, our executives would reach out to the customers and ensure that all grievances are addressed within a predefined Service Level Agreement as communicated below.

If the complaint is not resolved within the given timelines or the response is unsatisfactory the customer can choose to escalate the concern to our level 2 escalation officer, with relevant details such as Complaint Reference Number provided at the time of raising the initial complaint. The escalation methodology is mentioned in this policy under the Escalation Section.

1.2 Online Dispute Resolution (ODR) System:

TranServ has implemented an Online Dispute Resolution (ODR) system for resolving customer disputes and grievances pertaining to digital payments, using a system-driven and rule-based mechanism with zero or minimal manual intervention for disputes and grievances related to failed transactions.

Customer Resolution Timeline:

Sr. No.	Complaint Type	Estimated timelines (SLA)
1	Any Dhani Pay wallet transaction related issue	Not more than 30 days (In case of involvement of third parties in resolution, timelines followed by leading banks would be applied and communicated to customers)

The process is split across two steps:

- i) Acknowledgement: Acknowledgement of customer query or complaint. This will be delivered via email.
- ii) Resolution: Response to the customer either in form of resolution, or for any further communication/ detail required to resolve the customer concern as prescribed below-
 - To initiate action to resolve any customer complaint / grievance expeditiously, preferably within 48 hours and resolve the same not later than 30 days from the date of receipt of such complaint / grievance.
 - To display the detailed list of their authorized / designated agents (name, agent ID, address, contact details, etc.) on the website / mobile app.

2. Resolution of Grievances:

2.1 Grievances related to attitudinal aspects:

Such complaints are handled courteously, sympathetically and above all swiftly. TranServ, under no circumstances, tolerates misbehavior of any degree by staff members.

2.2 In case a customer is not satisfied with the redressal provided by the TranServ within 30 days, he/she can also approach the office of Ombudsman set up by RBI for redressal.

2.3 Any Customer who has a grievance against the Company on any one or more of the grounds mentioned in Chapter IV of the Integrated Ombudsman Scheme, 2021 issued by RBI on November 12th, 2021 and updations thereof (for details visit https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021_121121.pdf), may himself or through his authorized representative (other than an Advocate), make a complaint to the Integrated Ombudsman in the manner detailed herein below.

3. Time frame:

Complaints are to be seen in the right perspective because these indirectly lead to continuous improvement in the working of the Company. Complaints received are analyzed from all possible angles. TranServ will endeavor to send an acknowledgement. Complaints are resolved maximum within 30 days from the date of receipt.

Time matrix for dealing with the complaint redress process with escalation matrix for various natures of complaints has been given in **Annexure- Escalation Grid**. Departments/ officials dealing with the customer complaints are required to strictly adhere to the same.

Periodical MIS on complaint is generated and circulated amongst the senior officials of the Company for their knowledge and further instructions, if any.

Escalation Grid

FIRST LEVEL	Customers are requested to visit, call or write to TranServ's Dhani Pay Customer Care: ODR on Mobile App Phone : 0124-6555-555 Chat Email : support@dhani.com Courier : TranServ Limited, Dhani Pay Customer Care, Unit No. 401 & 402, One International Center, 4th Floor, Tower 1, S B Marg, Elphinstone Road (W), Mumbai – 13, Maharashtra In all the modes, a reference number would be provided for all future communication around the complaint. The customer will also be kept informed on the progress towards the final resolution, or communicate any delays in redressing the concern All complaints would be closed only basis the customers feedback and acceptance of closure
SECOND LEVEL	In case the customer is not satisfied with the: • Resolution provided by Level 1 executives • Behavior of any representative or staff member at TranServ • Breach in the Service Level Agreements or timeline or • Complaint is not resolved within 15 working days, Customer may escalate the grievance to Level-2 via phone 0124-6555-555 or write to cs.head@ghanipay.in
THIRD LEVEL	If the complaint is not resolved satisfactorily within 7 working days, or delay in response beyond the timelines communicated even after following the above-mentioned escalation steps, customer can contact our principal nodal officer at: To, Mr. Sidharth Nathani Principal Nodal Officer TranServ Limited Dhani Pay Customer Care, Unit No. 401 & 402, One International Center, 4th Floor, Tower 1, S B Marg, Elphinstone Road (W), Mumbai – 13, Maharashtra Email: nodal@ghanipay.in Phone: 120-6977999

FOURTH LEVEL	As per the “INTEGRATED OMBUDSMAN SCHEME, 2021” issued by the Reserve Bank of India on 12 November 2021 and updations thereof, if the complaint is not redressed satisfactorily within 30 days, the customer may lodge the complaint online through the portal designed for the purpose i.e., https://cms.rbi.org.in. The complaint may also be submitted through electronic or physical mode to the Centralised Receipt and Processing Centre in the following manner – <u>Electronic Mode</u> Email ID– crpc@rbi.org.in <u>Postal Address</u> Centralized Receipt and Processing Centre, Reserve Bank of India, 4th Floor, Sector 17, Chandigarh – 160017 <u>Toll-free number</u>: 14448 (for enquiry)
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Customer Protection Policy:

Background

Increase in transactions using prepaid payment instruments (prepaid account / cards) have multiplied the associated risks and hence Customer Protection against unauthorized electronic payment transactions has assumed greater importance. The Reserve Bank of India has laid down the provisions for determining the customers’ liability in unauthorized electronic payment transactions resulting in debit to their wallet /cards.

RBI requires PPI issuers to formulate a policy covering aspects of customer protection, including the mechanism of creating customer awareness on the risks and responsibilities, and customer liability arising in specific scenarios of unauthorized electronic transactions resulting in debit to their wallet/ cards.

Categories of transactions:

Electronic payment transactions using Dhani Pay PPIs are divided into two categories:

- I. Remote / Online payment transactions (transactions that do not require physical PPIs to be presented at the point of transactions e.g. wallets, card not present (CNP) transactions, etc.

II. Face-to-face / Proximity payment transactions (transactions which require the physical PPIs such as cards or mobile phones to be present at the point of transactions e.g. transactions at ATM, Point of Sale, transactions done via mobile app etc.).

Roles & Responsibilities of TranServ

i. TranServ will ensure that the Customer protection policy is available on the website as well as over the mobile app for reference of customers.

ii. TranServ shall conduct awareness on carrying out safe electronic transactions by sending emails to customers on non-disclosure of sensitive information e.g. password, PIN, OTP, date of birth, etc.

iii. TranServ shall ensure SMS alerts and email alerts for all payment transactions mentioning the contact details to report unauthorized transactions or notify objections.

iv. TranServ shall advise customers to notify any unauthorized transaction at the earliest to avoid the risk of loss due to delay in informing TranServ.

v. TranServ shall facilitate 24X7 access via website/SMS/e-mail for customers to report any unauthorized transactions and / or loss or theft of the PPI. TranServ will also provide an option on the mobile app/home page to report any such transaction.

vi. TranServ shall ensure immediate response as acknowledgement to the complaint lodged. The systems shall record the date and time of receipt of complaint.

vii. TranServ will also ensure that no transaction is conducted post lodging of complaint of an unauthorized transaction by the customer until the complaint has been resolved

viii. Within 10 days of the lodging the complaint TranServ shall pass a notional credit as per the applicable customer liability. TranServ shall within 90 days resolve the complaint and pay to the customer eligible amount.

ix. In case of non-resolution to determine customer liability within 90 days the customer shall become eligible for the compensation.

x. During the investigation, if it is found that the customer has falsely claimed or disputed a valid transaction, TranServ reserves the right to cancel the notional credit and take preventive action including blocking of wallet/card.

Obligations of Customer

a) Customers should provide all necessary documentation – customer dispute form, proof of transaction success/ failure and should also file a police complaint and provide a copy of the same to TranServ.

b) Customers should cooperate with the TranServ investigating team and provide all assistance.

c) Customers must not share sensitive information (such as Card details & PIN, CVV, user Id & password, OTP, transaction PIN, challenge questions) with any entity, including TranServ staff.

d) Customers must set transaction limits to ensure minimized exposure.

e) Customer must protect their device as per best practices including updation of latest antivirus software on the device (Device includes smartphone, feature phone, laptop, desktop and Tab) Customer must verify transaction details from time to time from the account statement and raise query with TranServ as soon as possible in case of any mismatch.

f) Customers shall go through various instructions and awareness communication sent by TranServ.

Liability of a Customer

a) Zero Liability of the customer:

A customer's entitlement to zero liability shall arise where the unauthorized transaction occurs in the following events:

➤ Contributory fraud/ negligence/ deficiency on the part of TranServ (irrespective of whether or not the transaction is reported by the customer).

➤ Third party breach where the deficiency lies neither with TranServ nor with the customer but lies elsewhere in the system, and the customer notifies TranServ within three (3) days of receipt of transaction communication.

➤ Any loss occurring after the reporting of unauthorized transactions.

b) Limited Liability of the customer:

A Customer Liability for the loss occurring due to unauthorized transaction where the deficiency lies neither with TranServ nor with the customer but lies elsewhere in the system (Third Party Breaches), and the customer notifies TranServ after three (3) days and within seven (7) days of receipt of transaction communication shall be equal to transaction value or Rs.10,000 per transaction, whichever is lower.

c) Complete Liability of the customer:

Customer shall bear the entire loss in cases where

➤ the loss is due to negligence by the customer, e.g. where the customer has shared payment credentials or Account/Transaction details, viz. user Id & PIN, Credit Card PIN/ OTP or due to improper protection on customer devices like mobile / laptop/ desktop leading to malware / Trojan or Phishing / Vishing attack. This could also be due to SIM deactivation by the fraudster.

➤ The deficiency lies neither with TranServ nor with the customer but lies elsewhere in the system, and the customer notifies TranServ after seven (7) days of receipt of transaction communication.

Proof of Customer Liability

TranServ has a process of second factor authentication for all card transactions, as regulated by the

Reserve Bank of India. TranServ has onus to prove that all logs / proofs / reports for confirming two factor authentications are available. Any unauthorized transaction which has been processed post second factor authentication known only to the customer would be considered as sufficient proof of customer's involvement / consent in effecting the transaction.

Reporting and Monitoring

TranServ shall put in place a mechanism for reporting the customer liability cases to the Board or its Committee. The reporting shall inter-alia, include volume/ number of cases and the aggregate value involved and distribution across various categories of cases.
