

POLICY NAME: Customer Grievance Redressal

POLICY NO- V2

POLICY LEVEL: Regional - India

APPROVAL AUTHORITY: Board of Directors

POLICY OWNER: Museb Shaikh

POLICY ADMINISTRATOR: Amit Agarwal

EFFECTIVE DATE: Feb 2022

DATE OF LAST APPROVAL: Apr 2022 DATE OF NEXT APPROVAL: Apr 2023

REVISION HISTORY

Version	Revisions	Approval Date	Effective Date
1	-	Apr 22,2022	May 01 2022
1	-	May 26 2022	June 01 2023

DEFINITIONS

Consumer: An Individual or End User who has provided consent to entities (which are not Specified Users as defined under Section 2 (I) of the Credit Information Companies (Regulation) Act, 2005

CIC - Credit Information Company i.e. Equifax

CI- Credit Institution. **RM** - Regional Manager

D2C - Direct 2 Consumer

CPC - Consumer Protection Committee

FP- False Positive **FN**- False Negative

STATEMENT OF OBJECTIVE

The objective of this Policy is to provide guidelines for processing the Disclosure request and resolving the grievance as raised by the Consumers within the specified time as stipulated by the provisions of Credit Information Companies (Regulation Act), 2005 and Rules & Regulations (CIC Laws) made thereunder and guidelines issued by Reserve Bank of India (RBI) from time to time.

OWNERSHIP

The customer service team is responsible for creating, executing and maintaining the procedures. The Head of the department is responsible for the review of the process on an annual basis.

DISCLOSURE



- Consumer can avail a free copy of Full Free Credit Report online through the D2C portal
- If the consumer is unable to create an account on the portal due to unavoidable circumstances, the consumer can avail a free report offline by sending an email to ecissupport@equifax.com.
- Consumer can access the form available on the <u>Equifax Website</u> under 'Forms' or Consumer can request for a form by calling Equifax Customer Support at 1800-209-3247

Documentation Required

Online Process

• Consumer can access the report online by creating an Account and verify their KYC details and generate the CIR through the online D2C application

Offline process

Following documents will be required from consumers for processing disclosure requests for offline processes. Detailed process notes are hosted on the website.

- Credit Report Request form duly filled
- KYC documents
- Payment evidence (in case the consumer is requesting for his second or subsequent report)

GRIEVANCE REDRESSAL

MODES OF FULFILLMENT

If a consumer has identified any discrepancy in the CIR, they can initiate a dispute with Equifax through different communication channels as listed below:

- Consumers can call the Equifax Support Team at 1-800-209-3247 (only guidance will be given, no dispute will be accepted on calls). Consumer has to send the request in writing
- Consumer can mail the dispute request in writing and Post the letter at Equifax Head Office address listed on the website
- Consumer can submit the dispute request through Equifax Website by completing the "Dispute Resolution Form"
- Consumer can send an email to ecissupport@equifax.com
- The customer service team will track the complaint along with the date on each stage of the disputes as listed below.
 - Received Date of the dispute / complaint
 - Raised Date of the complaint or dispute with CI
 - Response Received Date from the CI
 - o Resolution Date
 - And in case of no response the communication date to the consumer or customer..



Classification of Dispute Emails

Effective 1st June23 the team will classify the emails as below for all the disputes received from members and consumer

Bureau Issue -False Positive -False Negative -Data Ingestion Delay / Issue Member Issue. -Trade Dispute -Inquiry Dispute -PII Update Issue

INFORMATION REQUIRED

Below mentioned information is required in order to initiate a dispute

- Equifax report order number
- Details of disputes.
- Any documents which would help in resolving disputes.

DISPUTE CLASSIFICATION

- False Positive- Consumer Tradelines are incorrectly captured in the Equifax CIR
- False Negative Consumer Tradelines are not captured in the Equifax CIR
- Member to Report Inaccuracy in the data submitted by the Institution

CREDIT INSTITUTION DISPUTE

Any dispute which is received and requires resolution from an credit institution, following steps are to be followed:

- Equifax to initiate the dispute with the credit institution
- Request could be raised in bulk or individual request
- Dispute flag will be displayed on the CIR effective Jun'22 for any open disputes until resolution for credit underwriters to make the fair credit decision
- Disputes should resolve within 30 days by the credit institution
- Weekly follow-ups will continue for any disputes which are not resolved within 30 days. All such tickets will remain open until resolved
- A list of such dispute dump will be shared with RBI on monthly basis between 5th to 10th of the month for the previous month

CIC DISPUTE

Any dispute which is received and requires resolution from Equifax for "False Positive" and "False Negative" cases, below mentioned process to be followed.



False Positive

- CS desk to investigate and will take necessary action to make the correction on the report.
- Once the correction is done the CS team will share the corrected report with the consumer or if required with the customer.

False Negative

- Customer / Consumer to provide the missing account number & credit institution name to the
- The CS desk will check if the said account is present / submitted to the Bureau.
- CS to work with the tech team to identify the reason & provide a resolution.

CPC (CONSUMER PROTECTION COMMITTEE)

- The CPC team will meet on quarterly basis and review the CPC deck
- The deck will have details as per the format shared by RBI.
- All open disputes which have crossed the TAT of 30 days will be shared with RBI along with the CPC deck.

GOVERNANCE

- Weekly follow-up will be done on the Member to Report cases
- Updates will be shared with consumer on the dispute status
- Any process changes will be presented to the CPC committee for approval. Post that, it will be presented to the Board for approval.

CONSUMER AWARENESS- CREDIT WORTHINESS

- CS desk team will participate in credit awareness session for the consumers via social media
- CS desk team shall provide an assistance to consumers to help them understand their CIR and resolve their queries

TURNAROUND TIME

Legends	RBI Regulation	TAT (working Hrs.)
Dispute Request- Internal (FP & FN)	CICRA Act- Chapter 21	7 Days
Dispute Request- Member to Report	CICRA Act- Chapter 21	30 Days

Stages of Dispute and TAT



Member to Report Scenario (Dependency on CI)

Stage	Explanation	TAT
Stage I	Acknowledgement of dispute email	2 to 6 hrs
Stage II & Stage III	Dispute Investigation and to be raised with CI	7 Days
Stage IV	Dispute Correction post response from CI	3 Days
Stage V	Validation of OLM correction and resolution with consumer	4 Days

False Positive Case (No Dependency on CI)

Stage	Explanation	TAT
Stage I	Acknowledgement of dispute email	2 to 6 hrs
Stage II	Dispute Investigation and resolution to consumer	7 Days

Retention Period

- Emails All emails on support ID (ecissupport@equifax.com) will be retained for 5 years
- Physical documents All documents will be maintained for a minimum 1 year and on need basis can store for 3 years..

ESCALATION MATRIX

	ESCALATION MATRIX				
Sr No	Level	Name	Designation (Optional)	Mobile Number	Email address
1	First Level	Support Team			ecissupport@equifax.co m



Second Level	Yashpal Deora	Associate Manager CS	yashpal.deora@equifax. com
Third Level	Museb Shaikh	Sr. Manager CS	museb.shaikh@equifax.c om
Final Escalation	Ŭ	VP Operations	amit.agarwal@equifax.c om

Nodal Officer and Principal Nodal officer

- As CIC is now part of the RBI ombudsman scheme, CIC needs to have a Nodal officer and a Principal Nodal officer to respond to the complaint received on RBI ombudsman portal.
- Below are the details.

Nodal Officer

Name – Yashpal Deora Mobile # - +91 7020369042 Email ID – yashpal.deora@equifax.com

Principal Nodal Officer

Name – Museb Shaikh Mobile # - +91 9167 393 225 Email ID – museb.shaikh@equifax.com

ANNEXURE

• Updated process note will be displayed on the website