



POLICY NAME : Customer Grievance Redressal
POLICY NO : V3
POLICY LEVEL : Regional - India
APPROVAL AUTHORITY : Board of Directors
POLICY OWNER : Amit Agarwal
POLICY ADMINISTRATOR : Museb Shaikh
EFFECTIVE DATE : Feb 2022
DATE OF LAST APPROVAL : Mar 2024
DATE OF NEXT APPROVAL : June 2025

REVISION HISTORY

Version	Revisions	Approval Date	Effective Date
1	-	Apr 22,2022	May 01 2022
1	-	May 26 2022	Jun 01 2023
2	-	Mar 21,2024	Apr 01,2024
3	-		

POLICY OVERVIEW

The Policy is designed to establish the guidelines for processing the Disclosure request and grievance redressal mechanism in accordance with the Credit Information Companies (Regulation Act), 2005, Credit Information Rules 2006 (CIC Rules 2006) and other Indian applicable regulations. This Policy is an internal document that cannot be shared outside of ECIS without VP - Data Operations & Excellence.

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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. ECIS
CI - Credit Institution.
RM - Regional Manager
D2C - Direct 2 Consumer
CPC - Consumer Protection Committee
FP - False Positive



- FN** - False Negative
IO - Internal Ombudsman

I. 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 Credit Information Rules 2006 (CIC Rules 2006) and other Indian applicable regulations issued by Reserve Bank of India (RBI) from time to time.

II. 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.
- Consumers can access the form available on the ECIS Website under '**Fill the Credit Report Request form.**' or Consumer can request for a form by calling ECIS Customer Support number or mailing at ecissupport@equifax.com.

Documentation Required

Online Process

- Consumers 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)

III. GRIEVANCE REDRESSAL

A. MODES OF FULFILLMENT

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



- Consumers can call the ECIS Support Team (only guidance will be given, no dispute will be accepted on calls). g
- Consumer can mail the dispute request in writing and Post the letter at ECIS Head Office address listed on the website
- Consumer can submit the dispute request through ECIS Website by completing the **“Dispute Resolution Form”**
- Consumers 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
 - Resolution Date
 - And in case of no response the communication date to the consumer or customer.

B. TRACKING OF DISPUTES

All disputes are raised and tracked through an automated complaint management system-Salesforce.

IV. FRAMEWORK FOR CUSTOMER COMPENSATION

A framework for compensation to customers for delayed updation/ rectification of credit information has been implemented in the complaint management system-Salesforce in accordance with the circular RBI/2023-24/72 DoR.FIN.REC.48/20.16.003/2023-24, wherein complainants shall be entitled to a compensation in case their complaint is not resolved within the time period as specified by the regulator. The detailed process is available in the SOP.

V. Handling of Dispute

A. 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 - Score Query
- Member Issue. -Trade Dispute -Inquiry Dispute -PII Update Issue
- No Issue - Not False positive

B. 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.

C. 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
- Not False positive - Cases which are rejected by the Equifax

D. CREDIT INSTITUTION DISPUTE

- Any dispute which is received by ECIS and requires resolution from an credit institution is categorized as “Credit Institution Dispute”, the step to be followed in case such a category of complaint is received is available in SOP.

E. CIC DISPUTE

- Any dispute which is received and handled by ECIS only is categorized as “CIC Dispute” These categories are further classified as i) “False Positive” and ii) “False Negative” and iii) Not False positive cases, process to be followed for both kind of scenarios are available in SOP.

VI. TURNAROUND TIME FOR RESOLVING DISPUTE.

In accordance with Section 21(3) of CICRA, 2005 and Rule 20 (3) (c) of Credit Information Companies Rules, 2006 provide the CI and the CIC, collectively, an overall limit of thirty (30) days has been permitted to resolve/ dispose of the complaint. In case there is dependency on CI, the time period would be bifurcated and a CI would get twenty-one (21) days and CICs would effectively get the remainder of nine (9) days for complete resolution of the complaint. ECIS has also defined its internal TAT which is available in the SOP.

VII. 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.

VIII. RETENTION PERIOD FOR COMPLAINTS RECEIVED

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.

IX. GOVERNANCE

- Weekly follow-up will be done on the Member to Report cases
- Updates will be shared with consumer on the dispute status

CONSUMER AWARENESS- CS desk team will participate in credit awareness sessions for the consumers via social media or other channels to create awareness.

X. Annual Disclosure of complaints

The Credit Information Company (CIC) is responsible for ensuring the annual disclosure of complaints adheres to the established Standard Operating Procedure (SOP).

As the data for submission, including numerical figures, is an integral part of the annexure mandated by Reserve Bank of India (RBI) guidelines, the CIC must await the completion of the March data submission in April. Consequently, the publication of these numbers should occur only after the aforementioned data submission is finalized.

The data must be published no later than Apr 30th.

XI. ADMINISTRATION AND GOVERNANCE

The Customer Service team is responsible for creating, executing and maintaining the procedures. This Policy shall be reviewed by the Policy owner and the Policy Administrator annually and the required changes shall be carried out to this Policy. The revised policy shall be approved by the Approval authority, if there are any modifications done to this Policy document.

ESCALATION MATRIX

Level	Name	Designation	Email address
First	Support Team		ecissupport@equifax.com
Second	Yashpal Deora	Associate Manager	yashpal.deora@equifax.com
Second	Swati Sawant	Lead - CS	swati.sawant@equifax.com
Third	Museb Shaikh	AVP- Operations	museb.shaikh@equifax.com
Final	Amit Agarwal	VP Operations	amit.agarwal@equifax.com



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

Email ID – yashpal.deora@equifax.com

Name- Swati Sawant

Email ID – swati.sawant@equifax.com

Principal Nodal Officer

Name – Museb Shaikh

Email ID – museb.shaikh@equifax.com

ANNEXURE

- None