

# CONSUMER GRIEVANCE REDRESSAL POLICY

CRIF High Mark Credit Information Services Pvt. Ltd.

## DOCUMENT CONTROL

Release Notice	
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<b>Authors:</b>	Sunil Agithakaliya, Chief Operating Officer
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### Version History:

Version History				
Version	Status	When	Who	Comments, if any
1.0	Approved	19 <sup>th</sup> November 2015	Prashant Kadakia	Initial Version
1.1	Approved	29 <sup>th</sup> March 2018	Pooja Rajput	Addition in point no 2, changed point no. 3 and modification of sub-point 1 under point 5
1.2	Approved	01 <sup>st</sup> March 2019	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Revision in Classification of Requests and change in definition of Complaints and Queries</li> <li>- Contact address for Mumbai office removed</li> <li>- Addition of escalation matrix to policy</li> </ul>
1.3	Approved	10 <sup>th</sup> March 2021	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Updated CRIF Care contact details.</li> <li>- Updated contact address for Pune office.</li> <li>- Updated Procedure for Grievance Redressal flow</li> <li>- Updated Augmentation Mechanism</li> </ul>

1.4	Approved	7 <sup>th</sup> December 2021	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Updated regarding the sharing of free copies of credit reports and maintaining a tracker -</li> <li>Updated the escalation matrix</li> <li>- Updated the workflow for under dispute tickets</li> </ul>
1.5	Approved	19 <sup>th</sup> October 2022	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Updated Team Leader's details</li> <li>- Updated the Principal Nodal Officer details</li> </ul>
1.6	Approved	12 <sup>th</sup> January 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Applicable provision related to Internal Ombudsmen directions vide circular RBI/2022-23/124 CEPD. PRD.No.S806/13-01008/2022-23</li> </ul>
1.7	Approved	19 <sup>th</sup> April 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Changes to IO process -</li> <li>Inclusion of process on communication to complainant on delay in resolution of complaint within 30 days</li> </ul>
1.8	Approved	1 <sup>st</sup> September 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Changes in process for cases where complaints sent to CIs and rejected by them irrespective of recency in data submission.</li> <li>- Inclusion of Principal Nodal Officer</li> </ul>
1.9	Approved	15 <sup>th</sup> November 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Updated escalation matrix</li> <li>- Changes in IO process</li> </ul>
1.10	Approved	7 <sup>th</sup> March 2024	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>- Changes in Internal Ombudsman Roles and responsibilities and procedural guidelines owing to Master Direction - RBI (Internal Ombudsman for RE) Directions, 2023</li> </ul>
1.11	Approved	5 <sup>th</sup> June 2024	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>o Changes made to section 5.1 – “The gateway for queries and complaints”</li> </ul>

				<p>based on the new Dispute origination and resolution systems.</p> <ul style="list-style-type: none"> <li>○ Changes made to section 5.2 – <ul style="list-style-type: none"> <li>-“Consumer Grievance Redressal Workflow” for updating type of complaints and process updates to address the different type of complaints.</li> <li>-Change in the timeframe for marking “Under Dispute” from 30 days to date of complaint</li> <li>-Availability of dashboard for CI in DRS and status for complainant in DOS</li> <li>-Facility to share rectified credit report from DRS to complainant and CI</li> <li>-Removal of direct content from the RBI circular and providing only reference to the process followed for IO.</li> </ul> </li> <li>○ Added more sections – <ul style="list-style-type: none"> <li>5.3 - “Provision for Calculation of TAT and associated Penalty”,</li> <li>5.4 - “Quality Monitoring and Feedback” and</li> <li>5.5 -“Management Information System” respectively</li> </ul> </li> <li>- Changes made to section 7 – “Escalation Matrix” to update on new leadership</li> </ul>
1.12	Approved	7 <sup>th</sup> August 2024	Sunil Agithakaliya	<ul style="list-style-type: none"> <li>○ Update on Principal Nodal Officer contact details</li> </ul>

				<ul style="list-style-type: none"> <li>○ Inclusion of process for complainants who are unable to raise dispute on DOS</li> <li>○ Inclusion of process for compensation payment</li> <li>○ Inclusion of storage of call details</li> </ul>
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**Sign Off History:**

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Version	Status	When	Who	Comments, if any
1.0	Approved	3rd December 2015	Board of Directors	Initial Version
1.1	Approved	12 <sup>th</sup> April 2018	Board of Directors	Addition in point no 2, changed point no. 3 and modification of subpoint 1 under point 5
1.2	Approved	14 <sup>th</sup> March 2019	Board of Directors	<ul style="list-style-type: none"> <li>- Revision in Classification of Requests and change in definition of Complaints and Queries</li> <li>- Contact address for Mumbai office removed</li> <li>- Addition of escalation matrix to policy</li> </ul>
1.3	Approved	24 <sup>th</sup> March 2021	Board of Directors	<ul style="list-style-type: none"> <li>- Updated CRIF Care contact details.</li> <li>- Updated contact address for Pune office.</li> <li>- Updated Procedure for Grievance Redressal flow</li> <li>- Updated Augmentation Mechanism</li> </ul>
1.4	Approved	21 <sup>st</sup> December 2021	Board of Directors	<ul style="list-style-type: none"> <li>- Updated regarding the sharing of free copies of credit reports and maintaining a tracker.</li> <li>- Updated the escalation matrix.</li> <li>- Updated the workflow for under dispute tickets</li> </ul>

1.5	Approved	21 <sup>st</sup> November 2022	Board of Directors	<ul style="list-style-type: none"> <li>- Updated Team Leader's details</li> <li>- Updated the Principal Nodal Officer details</li> </ul>
1.6	Approved	15 <sup>th</sup> February 2023	Board of Directors	<ul style="list-style-type: none"> <li>- Applicable provision related to Internal Ombudsmen directions vide circular RBI/2022-23/124</li> <li>CEPD. PRD.No.S806/13-01008/2022-23</li> </ul>
1.7	Approved	5 <sup>th</sup> May 2023	Board of Directors	<ul style="list-style-type: none"> <li>- Changes to IO process - Inclusion of process on communication to complainant on delay in resolution of complaint within 30 days</li> </ul>
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1.9	Approved	30 <sup>th</sup> November 2023	Board of Directors	<ul style="list-style-type: none"> <li>- Updated escalation matrix</li> <li>- Changes in IO process</li> </ul>
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1.12	Approved	17 <sup>th</sup> September 2024	Board of Directors	<ul style="list-style-type: none"> <li>○ Update on Principal Nodal Officer contact details</li> <li>○ Inclusion of process for complainants who are unable to raise dispute on DOS</li> <li>○ Inclusion of process for compensation payment</li> <li>○ Inclusion of storage of call details</li> </ul>

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### 1. Purpose

The purpose of this Consumer Grievance Redressal Policy document of CRIF High Mark Credit Information Services Private Limited (subsequently referred to as CRIF HM) is to improve consumer experience by providing effective and timely resolution to consumer queries/requests and complaints

### 2. Scope/Applicability

Scope of the policy is to define guidelines to enable CRIF HM's Customer Service department to handle and effectively resolve consumer queries/requests or complaints related to CRIF HM credit reports

### 3. Responsibility

Role	Functional Responsibility
Product Support Team	To assist customer service with any issues with pdf report generation and any product related information
Tech Support Team	To resolve technical issues related to report generation
Data Operations Team	Responsible for data collection from credit institutions and updating the OLM
Match Team	Responsible to assist and resolve issues related to Match and provide a cumulative RCA every month as per defined guidelines.
Internal Ombudsman/Deputy Internal Ombudsman	Responsible to verify and act upon as necessary for rejected complaints as per board approved policy
MCC of CRIF HM	Responsible for reviewing and approving the Consumer Grievance Policy and associated MIS

### 4. Deviation

The Managing Director/ Management Control Committee (MCC) may approve deviation from the parameters listed in this policy document.

### 5. General Policy

#### 5.1 Gateway for Registering Queries and Complaints:

A person/entity can approach CRIF HM to register a complaint through CRIF HM's Consumer Grievance Redressal Portal or reach out to the customer service team:

- For Individual Consumers:

- B2C Customer - <https://cir.crifhighmark.com/free-credit-report/freeflow>
  
- B2B2C Customer - <https://cir.crifhighmark.com/personal-credit-report/raisedispute>
  
- For Credit Institutions:
  - <https://hub.crifhighmark.com/Inquiry/Inquiry/WebPortal.action>
  
- Nodal Officer:
  - Email ID – [nodalofficer@crifhighmark.com](mailto:nodalofficer@crifhighmark.com)
  - Contact Number – 020-6715-7777
  
- Principal Nodal Officer:
  - Email ID – [principalnodalofficer@crifhighmark.com](mailto:principalnodalofficer@crifhighmark.com)
  - Contact Number – 020-6715-7742

A person/entity can also send a physical copy of their concern to the below address:

- **Pune office:** Axis Centra, Survey No. 62/1/4, Baner, Pune – 411045

## 5.2 Consumer Grievance Redressal Workflow:

Consumer grievances can be classified into complaints or queries. Complaints can be further categorized into match, data contribution, technical issue, while Queries can be further categorized into report requests, score clarification or general clarifications.

Complaints are further categorized into –

- Dispute on personal details
- Dispute on inaccurate data in account
- Dispute on duplicate account
- Dispute on account ownership

- Dispute on inquiry information

Customer service team will follow the below steps for addressing any incoming consumer queries or concerns –

- All Complaints from individuals and credit institutions pertaining to individual credit report are received via the Dispute Origination System (DOS). For the complainants who are reaching us over call and unable to raise dispute over DOS, the customer service team assists by raising a complaint over DOS on their behalf.
- All queries pertaining to individual credit report are attended through the dedicated numbers shared on our website (for individuals – B2C) and communicated to credit institutions for B2B.
- For the complaints raised by credit institutions on behalf of an entity, the pre-requisites such as report id (CHM Reference number), account number, bank name, reason of dispute should be provided.
- For requests raised by credit institutions on behalf of an entity a consent letter needs to be furnished over and above the pre-requisites listed above.
- For the tickets raised through the DOS, an “Under Dispute” remark will be flagged once categorized as complaint
- For any consumer complaints involving incorrect data submission, DRS will be used by credit institutions to make the necessary corrections.
- Dashboards are provisioned as part of DOS and DRS systems to view the status of complaints for individuals and credit institutions respectively.
- The dashboard for the CI has various colour coding to highlight the aging of the complaint in order to sensitize on the need for resolution within the turnaround time mentioned by the regulator.
- Post rectification of data either by CI or CIC, a corrected report and the free copy of the updated report will be automatically shared to the complainant.
- At the end of every month, Customer Service team shall coordinate with CRIF HM Match and Data Operations team to identify RCA for all the complaints received during the month and record the preventive and corrective actions.
- The Internal Ombudsmen (IO)/Deputy Internal Ombudsmen (DIO) provided with read only access to ITSM ticketing Tool and RBI CMS portal. For all the complaints that are partly or wholly rejected by CIC, the Customer Service team shall send these cases for IO’s final decision, within 20 days of receipt of the complaint. The IO and the Customer Service team shall ensure that the final decision is communicated to the complainant within 30 days from the date of receipt of the complaint.

- The resolution of the IO/DIO Officer shall prevail over any resolution provided by the Customer Service team. An exception can be taken by Customer Service team with due approval from MD/CEO for disagreeing with IO/DIO 's decision. However, such decision of disagreement must be explicitly communicated to the complainant within 7 days of communication of the decision of the IO/DIO Officer on the case. All such cases shall subsequently be placed for review by the Consumer Protection Committee of the Board of Directors, on a quarterly basis.
- The Customer Service team shall use the analysis of complaints handled by the IO/DIO in their training to improve the awareness among the staff interacting with complainants and with Credit Institutions about, inter-alia, the pattern of complaints being received, their root causes, remedial measures and expected action. The IO/DIO may also be associated with such trainings, where necessary.
- The Customer Service team shall also coordinate with the IO/DIO to ensure report is sent to Consumer Education and Protection Department on quarterly and annual basis, based on the format shared in the circular RBI/2022-23/124 CEPD. PRD.No.S806/13-01-008/2022-23
- In cases where the complainant has approached the RBI Ombudsman before the Internal Ombudsman has examined the complaint, the customer service team should obtain the views of Internal Ombudsman and include the Internal Ombudsman's views in its submissions to the RBI Ombudsman.

#### 5.3 Provision for Calculation of TAT and associated compensation:

- Any dispute being raised through DOS shall already capture at the stage of dispute origination, the details of the payment mode to be used in case of a requirement for payment of compensation.
- DRS captures the number of days spent on a dispute by the CI and the CIC, such that the delays are calculated accordingly and the notification for applicable compensation is shared with respective CI, wherever applicable.
- DRS also provisions for the CI to acknowledge the receipt of a case for compensation and capture the details of the payment made by the CI towards the compensation associated with the dispute.
- Any complaint where the CIC has breached their turnaround time and the overall resolution time has also been breached, appropriate compensation will be paid by CIC for the period breached by the CIC. CIC will make the payment to the bank account shared by the complainant over DOS and the onus of providing accurate details rests with the complainant. CIC shall maintain a tracker of all the payments made to such complainants.

#### 5.4 Quality Monitoring and Feedback

- At the end of every month, Customer Service team shall consider all the disputes resolved in the month to identify areas of improvement.
- Quality Monitoring will cover sample of disputes received over DOS and queries received through calls.
- Feedback from IO/DIO will be inculcated along with the quality improvement areas identified and trainings to be arranged for team every quarter.
- Team shall monitor the repeat issues and communicate on same to the top contributing CIs towards complaints on a quarterly frequency.

### 5.5 Management Information System:

- Daily MIS with the list of actionable tickets/cases for Customer Service team will be available through DRS.
- Daily MIS will also allow for identification of repeat or multiple cases from same individual/entity to identify criticality and ensure prioritization by team for addressing such cases.
- The admin users of each CI in DRS have access to following MIS -
  - List of tickets assigned and associated aging.
  - List of closed tickets for compensation settlement.

### 6. Terms and Terminologies

- DOS – Dispute Origination System
- DRS – Dispute Resolution System
- IO – Internal Ombudsman
- RCA – Root Cause Analysis
- Partner – refers to Altruist Technologies Private Limited

### 7. Escalation Matrix

Level	Point of Contact	Purpose	For Complaints	For Queries
1	Customer Service Team	Reports pulled through CRIF's portal	<a href="https://cir.crifhighmark.com/free-credit-report/freeflow">https://cir.crifhighmark.com/free-credit-report/freeflow</a>	020-4056-20-01 020-4056-20-02 020-4056-20-03 020-4056-20-04 020-4056-20-05
		Reports pulled through channel partner	<a href="https://cir.crifhighmark.com/personal-credit-report/raisedispute">https://cir.crifhighmark.com/personal-credit-report/raisedispute</a>	020-4056-20-06 020-4056-20-07 020-4056-20-08
		Credit institute raising the disputes on behalf of the customer	<a href="https://hub.crifhighmark.com/Inquiry/Inquiry/WebPortal.action">https://hub.crifhighmark.com/Inquiry/Inquiry/WebPortal.action</a>	020-6715-78-09 020-6715-77-05 020-6715-77-60 020-6715-77-88
2	Nodal Officer	For Escalation Only	nodalofficer@crifhighmark.com 09:00 – 18:00 Monday – Friday	020-6715-77-77
3	Principal Nodal Officer	For Escalation Only	principalnodalofficer@crifhighmark.com 09:00 – 18:00 Monday – Friday	020-6715-742

## 8. Review and record maintenance

- This policy shall be reviewed annually to evaluate its continuing effectiveness and to verify if it aligns with the relevant legislation or CRIF HM's requirements/strategies/values
- MIS on complaints along with RCA findings and action taken would be shared with Consumer Protection Committee of CRIF HM every quarter
- On a quarterly frequency all call recordings from partner will be received by CRIF High Mark over SFTP. These call recordings will be reviewed by CRIF High Mark team within 10 calendar days of receipt and confirmation to be provided to partner for deleting the recordings from their storage. Partner team to provide certificate confirming the deletion of the recordings to CRIF High Mark within 5 calendar days of receipt of confirmation from CRIF High Mark.
- Customer Support process owner shall be responsible for storing, maintaining, updating, modifying, recording any changes to this policy and any supporting documentation

## 9. Conflict in Policy

In the event of any conflict between this Policy and the provisions contained in the regulations, the regulations shall prevail. Any subsequent amendment / modification in the Regulations, in this regard shall automatically apply to this policy.

## 10. Disclaimers and Exclusions

- Any dispute arising from services rendered by CRIF HM is subject to the jurisdiction of the courts in Mumbai only
- The process defined in this document is indicative only and not descriptive in nature. CRIF HM reserves the right to alter and / or delete any steps or clause/s or change this document in entirety through a review, without prior intimation.