

# CONSUMER GRIEVANCE REDRESSAL POLICY

CRIF High Mark Credit Information Services Pvt. Ltd.

## DOCUMENT CONTROL

Release Notice	
<b>Version Number:</b>	1.9
<b>Status:</b>	Approved
<b>Authors:</b>	Sunil Agithakaliya, Head of Products & Operations
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### Version History:

Version History				
Versi on	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	07 <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 - 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>

### 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 - 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. - 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 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>
1.8	Approved	1 <sup>st</sup> September 2023	Board of Directors	<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	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. 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 & resolve issues related to Match & provide a cumulative RCA every month as per defined guidelines.
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:

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

- For Individual Consumers:

- Email id - [crifcare@crifhighmark.com](mailto:crifcare@crifhighmark.com)
- Contact number - 020-6715-7771/779/776/780

- For Credit Institutions:

- Email id - [customerservice@crifhighmark.com](mailto:customerservice@crifhighmark.com)
- Contact number - 020-6715-7771/776/779/780

- Nodal Officer:

- Name - Michael Christian
- Designation - Senior Product Operations Manager
- Email ID – [nodalofficer@crifhighmark.com](mailto:nodalofficer@crifhighmark.com)
- Contact Number – 020-6715-7777

- Principal Nodal Officer:

- Name – Aniket Phadke
- Designation - VP-Operations
- Email ID – [principalnodalofficer@crifhighmark.com](mailto:principalnodalofficer@crifhighmark.com)
- Contact Number – 020-6715-7803

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:

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

- All consumer queries/requests, disputes/complaints are received via emails, addressed to CRIF HM which are subsequently logged into the ticketing tool & are acknowledged with a primary email response.
- Any consumer queries/ requests wherein the pre-requisites have not been provided by the consumer, shall be treated as closed after a communication is sent to the consumer highlighting the reason for ticket closure.
- Post receipt of the necessary pre-requisites, i.e., the 20-digit CRIF HM reference number, the credit institution name and the last 4 digits of the disputed account number, it will be considered as a new request.
- For the queries/requests raised by credit institutions on behalf of the consumer, a consent letter needs to be furnished over and above the pre-requisites listed above
- Consumer grievances can be classified into complaints or queries. Complaints can be further categorized into match, data contribution or technical issue while Queries can be further categorized into report requests, score clarification or general clarifications.
- The customer service team shall inform the consumer or the credit institution, as the case may be, of any inaccuracy, error or discrepancy in the data within 7 days of receipt of the complaint from consumer.
- For any consumer complaints involving ownership issue, credit institution shall be contacted to provide confirmation on the data provided by them if the initial analysis confirms there isn't any system issue. For cases where a system issue is detected, then customer service team shall liaise with other internal teams to make the necessary corrections and share the updated report with the complainant.
- For any consumer complaints involving incorrect data submission, customer service team shall initiate the request for an OLM with the credit institution. They shall follow up with the credit institution on a monthly basis till the OLM is provided by the credit institution.
- Customer service team shall communicate to the complainant on the steps undertaken for correction of such inaccuracy, error or discrepancy along with the reasons for its inability in resolution when they experience a delay from data contributors to provide response within 30 days from date of receipt of the consumer complaint.
- In case there is no response from the credit institution within 30 days from date of receipt of the consumer complaint, then the related credit information shall be tagged as 'under dispute' and inform the concerned credit institution and the consumer. For such cases tagged as 'under dispute', customer service team shall escalate the matter to senior levels at the credit institution after 15 days seeking an update on the dispute raised.
- Post receipt of the OLM sheet from the credit institution, the data operations team shall process the corrected information and notify the customer service team upon completion of the activity. Post rectification of data in the report as per the OLM, customer service team shall share a free copy of the updated report to the consumer via email. List of such free copy of the updated reports shared with the consumer shall be maintained in a tracker.
- Dispute or query resolution provided to the consumer over email shall be recorded in the ticketing tool.



- 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.
- Effective 01st April 2023, the Internal Ombudsmen (IO) shall be provided with read only access to CHM internal ITSM 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 for a final decision, within 21 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 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 '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 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.
- Effective 1st April 2023 All rejections (either partial or whole) being communicated to the complainant after examination by the IO shall necessarily mention in the response that he/she can approach the RBI Ombudsman for redress (provided the complaint pertains to a Credit Institution / Regulated Entity that falls under RB-IOS, 2021) along with complete details of the complaint. The advice should include the link to Reserve Bank's portal  
(<https://cms.rbi.org.in>) for online filing of complaints. Effective 30 November 2023, complaints pertaining to data contribution issues where credit institutions respond that there are no Internal changes to the information being disputed by the complainant, will be closed confirming no changes to the complainant. Such cases will not be sent to IO and pending complaints, if any, will be recategorized accordingly.
- The Customer Service team shall use the analysis of complaints handled by the IO 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 may also be associated with such trainings, where necessary.
- The Customer Service team shall also coordinate with the IO 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.

## 6. Terms and Terminologies

- OLM – Online Management / Data Correction
- RCA – Root Cause Analysis

## 7. Escalation Matrix

Level	Name	Email Address	Contact Nos.
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1	Customer Service Team	<a href="mailto:customerservice@crifhighmark.com">customerservice@crifhighmark.com</a> <a href="mailto:crifcare@crifhighmark.com">crifcare@crifhighmark.com</a> 09:00 – 18:00 Monday – Friday	020-6715-7771 /776/779/780
3	Nodal Officer	Michael Christian <a href="mailto:nodalofficer@crifhighmark.com">nodalofficer@crifhighmark.com</a> 09:00 – 18:00 Monday – Friday	020-6715-7777
4	Principal Nodal Officer	Aniket Phadke <a href="mailto:principalnodalofficer@crifhighmark.com">principalnodalofficer@crifhighmark.com</a> 09:00 – 18:00 Monday – Friday	020-6715-7803

## 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
- 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.
- Consumers should note that if a dispute has been raised to CRIF HM and CRIF HM has already responded stating that the bank / credit institution has confirmed that the information reported by them is correct, then the consumer needs to contact their bank / credit institution for all such disputes.