

CONSUMER GRIEVANCE REDRESSAL POLICY

CRIF High Mark Credit Information Services Pvt. Ltd.

DOCUMENT CONTROL

Release Notice	
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Version History				
Version	Status	When	Who	Comments, if any
1.0	Approved	19 th November 2015	Prashant Kadakia	Initial Version
1.1	Approved	29 th March 2018	Pooja Rajput	Addition in point no 2, changed point no. 3 and modification of subpoint 1 under point 5
1.2	Approved	01 st March 2019	Sunil Agithakaliya	Revision in Classification of Requests and change in definition of Complaints and Queries Contact address for Mumbai office removed Addition of escalation matrix to policy

1.3	Approved	10 th March 2021	Sunil Agithakaliya	<ul style="list-style-type: none"> - Updated CRIF Care contact details. - Updated contact address for Pune office. - Updated Procedure for Grievance Redressal flow - Updated Augmentation Mechanism
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1.4	Approved	7 th December 2021	Sunil Agithakaliya	<ul style="list-style-type: none"> - Updated regarding the sharing of free copies of credit reports and maintaining a tracker - - Updated the escalation matrix - Updated the workflow for under dispute tickets
1.5	Approved	19 th October 2022	Sunil Agithakaliya	<ul style="list-style-type: none"> - Updated Team Leader's details - Updated the Principal Nodal Officer details
1.6	Approved	12 th January 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> - Applicable provision related to Internal Ombudsmen directions vide circular RBI/2022-23/124 CEPD. PRD.No. S806/13-01008/2022-23
1.7	Approved	19 th April 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> - Changes to IO process - - Inclusion of process on communication to complainant on delay in resolution of complaint within 30 days

1.8	Approved	1 st September 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> - Changes in process for cases where complaints sent to CIs and rejected by them irrespective of recency in data submission. - Inclusion of Principal Nodal Officer
1.9	Approved	15 th November 2023	Sunil Agithakaliya	<ul style="list-style-type: none"> - Updated escalation matrix - Changes in IO process
1.10	Approved	7 th March 2024	Sunil Agithakaliya	<ul style="list-style-type: none"> - Changes in Internal Ombudsman Roles and responsibilities and procedural guidelines owing to Master Direction - RBI (Internal Ombudsman for RE) Directions, 2023
1.11	Approved	5 th June 2024	Sunil Agithakaliya	<ul style="list-style-type: none"> o Changes made to section 5.1 – “The gateway for queries and complaints”

				<p>based on the new Dispute management systems.</p> <p>o Changes made to section 5.2 –</p> <p>-“Consumer Grievance Redressal Workflow” for updating type of complaints and process updates to address the different type of complaints.</p> <p>-Change in the timeframe for marking “Under Dispute” from 30 days to date of complaint</p> <p>-Availability of dashboard for CI and complainant in DMS</p> <p>-Facility to share rectified credit report from DMS to complainant and CI</p> <p>-Removal of direct content from the RBI circular and providing only reference to the process followed for IO.</p> <p>o Added more sections –</p> <p>5.3 - “Provision for Calculation of TAT and associated Penalty”,</p> <p>5.4 - “Quality Monitoring and Feedback” and</p> <p>5.5 -“Management Information System” respectively</p> <p>- Changes made to section 7 – “Escalation Matrix” to update on new leadership</p>
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1.12	Approved	7 th August 2024	Sunil Agithakaliya	o Update on Principal Nodal Officer contact details
				<ul style="list-style-type: none"> o Inclusion of process for complainants who are unable to raise dispute on DMS o Inclusion of process for compensation payment o Inclusion of storage of call details
1.13	Approved	21 st November 2024	-	Directly approved by the Board
1.14	Approved	6 th March 2025	Sunil Agithakaliya	<ul style="list-style-type: none"> o Pune office address change o Customer Walkin and Inward Letters process o Change in escalation matrix o Change in IO process o Reporting of monthly, CPC deck and QoQ report o Compensation Payment Process o Entity wise root cause analysis of complaints o Categorisation of complaint based on criticality
1.15	Approved	27 th Nov 2025	Sunil Agithakaliya	<ul style="list-style-type: none"> • Quarterly submission percentage of incidents resolved in first contact. • Change in escalation matrix • Inclusion of Turn Around Time • Free Report URL updated

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 th 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 th March 2019	Board of Directors	<ul style="list-style-type: none"> - Revision in Classification of Requests and change in definition of Complaints and Queries - Contact address for Mumbai office removed - Addition of escalation matrix to policy

1.3	Approved	24 th March 2021	Board of Directors	<ul style="list-style-type: none"> - Updated CRIF Care contact details. - Updated contact address for Pune office. - Updated Procedure for Grievance Redressal flow - Updated Augmentation Mechanism
1.4	Approved	21 st December 2021	Board of Directors	<ul style="list-style-type: none"> - Updated regarding the sharing of free copies of credit reports and maintaining a tracker. - Updated the escalation matrix. - Updated the workflow for under dispute tickets
1.5	Approved	21 st November 2022	Board of Directors	<ul style="list-style-type: none"> - Updated Team Leader's details - Updated the Principal Nodal Officer details
1.6	Approved	15 th February 2023	Board of Directors	<ul style="list-style-type: none"> - Applicable provision related to Internal Ombudsmen directions vide circular RBI/2022-23/124 CEPD. PRD.No.S806/13-01008/2022-23

1.7	Approved	5 th May 2023	Board of Directors	<ul style="list-style-type: none"> - Changes to IO process - Inclusion of process on communication to complainant on delay in resolution of complaint within 30 days
1.8	Approved	1 st September 2023	Board of Directors	<ul style="list-style-type: none"> - Changes in process for cases where complaints sent to CIs and rejected by them irrespective of recency in data submission. - Inclusion of Principal Nodal Officer
1.9	Approved	30 th November 2023	Board of Directors	<ul style="list-style-type: none"> - Updated escala on matrix - Changes in IO process
1.10	Approved	7 th March 2024	Board of Directors	<ul style="list-style-type: none"> - Changes in Internal Ombudsman Roles and responsibilities and procedural guidelines owing to Master Direction - RBI (Internal Ombudsman for RE) Directions, 2023

1.11	Approved	5 th June 2024	Board of Directors	<ul style="list-style-type: none"> - Changes made to section 5.1 – The gateway for queries and complaints” based on the new Dispute Origination and Resolution Systems. - Changes made to section 5.2- Consumer Grievance Redressal Workflow” for updating type of complaints and process updates to address the different type of Complaints. - Change in the timeframe for marking “Under Dispute” from 30 days to date of complaint. - Availability of dashboard for CI in DMS and status for complainant in DMS - Facility to share rectified credit report from DMS to complainant and CI - Removal of direct content from the RBI circular and providing only reference to the process followed. - Added more sections- 5.3- “Provision of Calculation of TAT and Associate” 5.4- “Quality Monitoring and Feedback” 5.5- “Management Information System” respectively Changes made to Section 7- “Escalation Matrix” to update on new leadership.
1.12	Approved	17 th September 2024	Board of Directors	<ul style="list-style-type: none"> o Update on Principal Nodal Officer contact details o Inclusion of process for complainants who are unable to raise dispute on DMS o Inclusion of process for compensation payment o Inclusion of storage of call details

1.13	Approved	21 st November 2024	Board of Directors	Substitution of term “Managing Director” to “CEO and Whole-Time Director/Managing Director”.
1.14	Approved	6 th March 2025	Board of Directors	<p>Pune office address change</p> <p>Customer Walkin and Inward Letters process</p> <p>Change in escalation matrix</p> <p>Change in IO process</p> <p>Reporting of monthly, CPC deck and QoQ report</p> <p>Compensation Payment Process</p> <p>Entity wise root cause analysis of complaints</p> <p>Categorisation of complaint based on criticality</p>
1.15	Approved	10 th Dec 2025	Board of Directors	<p>Quarterly submission percentage of incidents resolved in first contact.</p> <p>Change in escalation matrix</p> <p>Inclusion of Turn Around Time</p> <p>Free Report URL updated</p>

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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 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

Deviation

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

4. 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/dtc/#/auth/register>

☐ For Credit Institutions:

customerservice@crifhighmark.com

☐ Nodal Officer:

- Email ID –

nodalofficer@crifhighmark.com

- Contact Number – 020-6715-7777

☐ Principal Nodal Officer:

- Email ID – 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:
Smartworks, 43EQ, 7th Floor, S. No 44 H. No 8/1 (P), Plot A,
Off Bharati Vidyapeeth School,
Balewadi, Pune, Maharashtra-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 –

- o Dispute on personal details
- o Dispute on inaccurate data in account
- o Dispute on duplicate account
- o Dispute on account ownership
- o Dispute on inquiry information
- o Categorisation of complaints based on criticality/repeatability.

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 Management System (DMS). For the complainants who are reaching us over call and unable to raise dispute over DMS, the customer service team assists by raising a complaint over DMS on their behalf.
- All walk-in customers, or any inward letter received by CHM, the customer service team shall raise a complaint in relevant interface (DMS) and address customer concern.
- 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 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 DMS, an “Under Dispute” remark will be flagged once categorized as complaint
- For any consumer complaints involving incorrect data submission, DMS will be used (who have been onboarded in DMS) by credit institutions to make the necessary corrections. For those Credit Institutions who haven’t been onboarded in DMS, CHM CS team will interact through manual process and will upload the copies of the correspondence on the DMS system for tracker updation.
- View Access is provisioned as part of DMS 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.
- For all the complaints that are partly or wholly rejected by CIC/CI, the Customer Service team shall send these cases for IO’s final decision.
- 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 customer service team shall perform root cause analysis on closed disputes on quarterly basis and present the same to Consumer Protection Committee. RCA will be carried out on quarterly basis.

Analysis of disputes done basis Entity Wise, Product wise, Dispute category-wise, Consumer group-wise, Geographical location-wise.

- Team will also reconcile the numbers reported in Monthly deck, CPC deck and QoQ report. Any change in “Data hygiene/ QoQ” numbers updated/corrected deck will be shared by the 6th of the following month.
- **Percentage of incidents resolved in First Contact:** Quarterly submission of the Risk Appetite % to the Enterprise Risk Management (ERM) team.
- The Internal Ombudsmen (IO)/Deputy Internal Ombudsmen (DIO) provided with read only access to DMS portal (wherever applicable) and RBI CMS portal. Implementation of auto-escalation of the partly or wholly rejected complaints to the Internal Ombudsman within 20 days. The IO and the Customer Service team shall ensure that the final decision of the closed cases is communicated to the complainant within 30 days from the date of receipt of the complaint.
- For all the complaints that are received at CMS/CPGRAMS portal the Customer Service team shall send these cases for IO’s final decision.
- 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/ Whole-time Director 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
- IO shall analyse all disputes basis Product wise, Dispute Category wise, Consumer group wise and Geographical location wise on quarterly basis and present the findings to the CPC.
- 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 DMS 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.

- DMS 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 and complainant, wherever applicable.
- DMS 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 DMS and the onus of providing accurate details rests with the complainant. CIC shall maintain a tracker of all the payments made to such complainants.
- Disputes where payment information is unavailable, or incorrect CI shall mark a mail to complainant requesting for correct and complete details for payment. CIC shall wait for 2 calendar days for revert from customer and action basis revert received from complainant. CIC shall maintain records of such communications.

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 DMS 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 DMS.
- 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.
- MIS will also enable the identification of cases that have been closed but reraised through CMS and CPGRAMS, where customer's trade line and disputed field are identical.
- The admin users of each CI in DMS have access to following MIS -
 - List of tickets assigned and associated aging.
 - List of closed tickets for compensation settlement.

5. Turn Around Time

The overall time limit for resolving or disposing of a complaint is thirty (30) days. Within this period, the Credit Institutions (CI) will have twenty-one (21) days to address the complaint, while the Credit Information Company (CIC) will have nine (9) days to ensure complete resolution.

7. Terms and Terminologies

- DMS – Dispute Management 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	https://cir.crifhighmark.com/dtc/#/auth/register	020-4056-20-01 020-4056-20-02 020-4056-20-03 020-4056-20-04 020-4056-20-05 020-4056-20-06 020-4056-20-07 020-4056-20-08
		Credit institute raising the disputes on behalf of the customer	customerservice@crifhighmark.com	020-6715-77-60 020-6715-77-88
2	Nodal Officer	For Escalation Only	nodalofficer@crifhighmark.com	020-6715-77-77
			09:00 – 18:00 Monday – Friday	
3	Principal Nodal Officer	For Escalation Only	principalnodalofficer@crifhighmark.com	020-6715-77-42
			09:00 – 18:00 Monday – Friday	

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.