

Unlimint

Customer Grievance Redressal Policy

Version 2.0

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1. Introduction

RBI vide notification dated 17 March 2020 bearing reference number RBI/DPSS/2019-20/174 DPSS.CO.PD.No. 1810/02.14.008/2019-20 ("PA Guidelines") has laid out regulations for all Payment Aggregators (PA) to ensure that a suitable mechanism is in place for receiving and addressing complaints from its merchants ("Merchants") and their customers ("Customers").

Unlimint In Private Limited (hereinafter referred to as the "Company" or "Unlimint") has a focused and pinpointed approach towards customer service. A robust mechanism has been put in place to resolve/address Merchant and Customer complaints in a timely and effective manner.

The Company will strive to provide the highest quality of customer service to ensure continued Merchant and Customer satisfaction and Merchant retention. To facilitate the Merchants and Customers to raise their grievances, the company has put an appropriate mechanism in place for redressal of grievances.

2. Principles of Grievance Redressal

Unlimint, through a comprehensive Grievance Redressal Policy, intends to put in place systems, procedures and review mechanism for minimizing instances of dissatisfactions and to ensure prompt redressal of complaints and grievances. Additionally, the key objectives of this policy are as under:

- ❶ Ensure unbiased, fair and just treatment to Merchants and Customers;
- ❷ Protect Unlimint service users against fraud, deception or unethical practices;
- ❸ Consistently assess the impact of services in order to improve services of Unlimint;
- ❹ Ensure speedy and efficient resolution of issues with adherence to basic principles of transparency and integrity;
- ❺ Educate the Merchants and Customers about alternate escalation mechanisms within and outside the company, for resolution of the complaints/issues if they are not satisfied with the company's response;
- ❻ Ensure that no fees/charges are levied for filing a complaint or seeking resolution for the same;
- ❼ All employees of the Company shall work in good faith and without prejudice to the interests of the Merchants and Customers.

3. Applicability

The policy document shall cover the details of grievance redressal mechanism and the procedures the employees of the company need to follow when complaints arise. The policy will cover all the products and services offered by the company with respect to Payment Aggregation business.

The Policy is mandatory for all the Company's employees and representatives, and apply in particular to:

- All Customer communication functions (Customer Relations, Business Development);
- Provision of services functions;

- Legal and Compliance Department;
- Executive Management.

4. Training of Employees

The Customer communications team and all relevant employees and officers at Unlimint undergo regular trainings on handling complaints and queries. All relevant prevailing laws of the land are being taught in respect to grievance handling to ensure the team is up to date on all compliance aspects. The company is focused at timely and quick resolution of all queries and grievances received and seeks feedback from all Merchants to ensure that the systems and mechanisms improve with time.

5. Nodal Officer Appointment

- ① A Senior official shall be designated as the Nodal Officer who shall be responsible for customer grievance handling functions.
- ② The Nodal Officer will look after the implementation of the Policy regarding customer service and complaint handling mechanism.
- ③ The Nodal Officer shall be responsible for representing the Company and for furnishing information to the Ombudsman in respect of complaints filed against the Company.
- ④ Details of the Nodal Officer for customer grievance shall be prominently displayed on the website.
- ⑤ The Nodal Officer shall report to the senior management of the company and will be supported by the Customer communication and service provision teams.

6. Submission of Complaints

The Company enables its Merchants and Customers to submit complaints through a Dispute Form duly available on the Company's website.

Going forward the Company will also provide other channels such as Chatbot, Whatsapp and phone number and accordingly this policy will be updated.

Below given is a list of details that will be collected from the Customers/Merchants by the company to investigate the complaint:

- ① Full Name;
- ② Address;
- ③ Detailed description of the complaint (including date the incident occurred, if applicable information on affected transactions, and desired outcome);
- ④ Transaction type, date, amount, and reference number;
- ⑤ Merchant details;
- ⑥ Supporting evidence (e.g., screenshots, communication, etc.);
- ⑦ Contact details (telephone number and email).

Each formal complaint received shall be categorised into the following types:

- ① Technical issues (e.g., configuration, software installation, etc.);
- ② Chargeback issues (e.g., duplicate transactions or incorrect billing, product or service does not meet customer expectations, non-receipt of goods or services, fraudulent transactions, etc.);
- ③ Payment Gateway issues (e.g., transaction timeout, transaction declined, etc.);
- ④ Transaction related queries (e.g., queries on transaction status, errors faced in transaction processing, etc.);
- ⑤ Settlement and refund issues (e.g., merchant queries/disputes on the pay-out/settlement amount credited to their bank account, queries on Merchant Discount Rate (MDR) and taxes levied on transactions, queries on refunds initiated & processed);
- ⑥ Actions of Company's employees;
- ⑦ Quality of information provided;
- ⑧ Terms of contract (e.g., violation of terms of contract with the Company for provision of services, fees & charges, etc.).

The following shall not be classified as complaints:

- Complaints not relating to provision of services by the Company.
- Complaints relating to the actions of another entity for which the Company has no legal or regulatory responsibility.

In such circumstances the Company shall respond informing the complainant that the complaint cannot be addressed by the Company. Where possible, additional details shall be provided on the Company's position on the complaint and/or where appropriate, the details of the entity responsible for handling the complaint.

Inquiries, comments, questions, as well as queries on technical issues: In such circumstances the responsible officer shall transmit the inquiry/comment/technical question to the relevant responsible department (e.g., E-commerce and Card Operations department in case of concerns or technical queries in connection with the Company's services) of the Company for handling and communicating with the Merchant or Customer in relation to the issue. The Merchant or Customer remains entitled to submit a complaint in case the issue is not resolved to his satisfaction by the relevant Department within the 10-business day timeframe.

The employee of the responsible department in receipt of the issue/inquiry/concern shall:

- Maintain records of communication with the Customer/Merchant;
- Maintain records of internal communication in relation to treatment of the issue;
- Keep the relevant stakeholders informed and updated.

The Heads of the Responsible Departments shall ensure department-level compliance with the requirements herein.

If Merchant/Customer remains dissatisfied with the proposed solution, such Merchant/Customer is entitled to submit a formal complaint to the Company in accordance with the present Policy.

7. Complaint handling process

Formal Complaints addressed to the Company in accordance with the Policy and contacts provided herein and on the website of the Company are reviewed by the concerned officer, in line with the procedures laid down in this Customer Grievance Redressal Policy.

The complaint handling process being followed by Unlimint is based on the following escalation matrix:

Escalation Level	Designation	Contact details	Resolution time
Level I	Customer Service Manager	Email: complaints@unlimint.in Address: Suite No. 132, Level 01, Tower A, Building No. 10, Cyberhub, CyberCity, Gurgaon-122002, Haryana, India	10 business days
Level II	Head of Customer Care	Email: customercarehead@unlimint.in Address: Suite No. 132, Level 01, Tower A, Building No. 10, Cyberhub, CyberCity, Gurgaon-122002, Haryana, India	7 business days
Level III	Nodal Officer	Email: nodaloffice@unlimint.in Address: Suite No. 132, Level 01, Tower A, Building No. 10, Cyberhub, CyberCity, Gurgaon-122002, Haryana, India	5 business days, but the final resolution must be offered to complainant no more than 30 calendar days from the date of initial submission of complaint.
Level IV	Ombudsman		

Level 1: Customer service Manager:

- a. Receives complaint;
- b. Generates complaint tracking number from the system;
- c. Sends the same to the Complainant acknowledging the receipt of the email;
- d. For the queries received through post/courier, the details will be shared on the phone number/email ID provided in the complaint;
- e. Additional documents, if any, required will be requested to be submitted;
- f. For the complaints relating to merchants will be forwarded to the merchants and other complaints will be handled by the Company;
- g. Dispute resolution time will be 10 business days. (For failed transaction the requirements of RBI TAT will be met).

Level 2: Head of Care

Any un-resolved disputes can be raised by the Complainant to head of care.

- a. Send an escalation with the complaint tracking number, date of initial complaint and issue un-resolved;
- b. Communication acknowledging the receipt will be sent at the earliest; and

- c. Head of care shall endeavour to resolve the dispute within 7 business days. (For failed transaction the requirements of RBI TAT will be met).

Level 3: Nodal Officer

Any un-resolved disputes by the head of care, can be raised by the Complainant to the Nodal officer.

- a. Send an escalation with the complaint tracking number, date of initial complaint, level 2 escalation and issue un-resolved;
- b. Acknowledgement will be sent at the earliest; and
- c. Nodal officer will endeavour to resolve the dispute within 5 business days. (For failed transaction the requirements of RBI TAT will be met).

Escalation: In case a response is not received within the specified time at any level or if the Merchant/Customer is unsatisfied with the response received from the Company, the Merchant/Customer may escalate the complaint to the next level as indicated below. Provided the Complainant will be required to exhaust the remedy available at the numerically proceeding level before escalating to a numerically higher level.

Banking Ombudsman: The Merchant and the Customer can approach the Ombudsman in case appropriate resolution is not received at previous levels.

8. Grievance Redressal Mechanism for Failed Transactions

Unlimint has put in place a process to address all customer grievances in relation to failed transactions. In the event of a consumer encountering a Failed Transaction, the consumer is advised to try again after some time provided money has not been debited from the account balance. However, in case of a Failed Transaction where account has been debited, the consumer is advised to raise a failed transaction grievance immediately in the manner provided below. The consumer can contact the customer service agents through the channels mentioned above.

Failed transaction grievances are resolved in accordance with the RBI circular DPSS.CO.PD No. 629/02.01.014/2019-20 dated 20 September 2019 on "Harmonization of Turn Around Time (TAT) and customer compensation for failed transaction using authorized Payment Systems."

The modes for registering complaints and Escalation Matrix shall be same as mentioned above in Section 7. All the complaints will have to be resolved within the timelines as specified by the RBI TAT Circular.

9. Reporting Requirements

Following Reports may be submitted by the Nodal Officer to the Board/Senior Management on an annual basis:

- ① The number and categories of complaints received;
- ② Resolution of complaints;
- ③ Systematic problems identified;

- ④ Proposals on changes in order to deal with recurring complaints;
- ⑤ Information on implementation of changes;
- ⑥ Root cause analysis of the top five complaints category;
- ⑦ Position of complaints against the Company with Banking Ombudsman (BO) and Consumer courts (if any);
- ⑧ Any adverse reporting in media with respect to customer servicing;
- ⑨ Any customer service impact due to unplanned downtime of IT systems or failure of business continuity plans.

10. Record Keeping

In line with Master Direction—KYC Direction, 2016, the company shall preserve records of all the complaints and the resolution offered shall be maintained for a minimum period of five years from the date of resolution. The Company shall evolve a system for proper maintenance and preservation of complaint records in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

The Company shall retain a register of received Complaints and Complaint records. The records shall include among others:

- ① Complaint received (including supporting documents and evidence);
- ② Results of internal investigations (including relevant data and documents used during the investigation);
- ③ Communication with the Customer/Merchant in relation to the Complaint;
- ④ Final resolution of the Complaint;
- ⑤ Remedial action taken.

The Compliance Department shall examine the complaint data for possible recurring patterns so as to identify root causes common to the types of complaints.

11. Policy Review

This Board approved policy will be reviewed as and when required or at least on an annual basis for incorporating changes and regulatory updates, if any, in overall grievance redressal mechanism, to improve customer experience and satisfaction.

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Designation: Nodal Officer

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