

GRIEVANCE REDRESSAL POLICY

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1. Introduction

A Customer Complaint is an expression of dissatisfaction from a Customer, requiring a response, about business activities performed by SBI Card or any of its employees or performed on their behalf by any third party.

SBI Cards and Payment Services Limited hereinafter referred to as (“SBI Card or SBICPSL”) or (“Company”) policy on customer grievance redressal is based on following principles:

- Customers are treated fairly at all times.
- A complaint is an expression of dissatisfaction made to an organization related to its products, services, or the complaint handling process where a response or resolution is explicitly or implicitly expected.
- Complaints raised by customers are dealt with courtesy, honesty and on time.
- Customers are informed about the avenues to escalate their complaints/ issues / grievances within and outside the organization.
- Company will treat all complaints efficiently and fairly as they can damage the company’s reputation and goodwill and lead to loss of customer’s faith.
- Employees would work in good faith and without prejudice to the interest of the customer.

The customer is the focus of the organization’s products, services and people. The business growth depends entirely on the satisfaction of the customers.

A grievance generally occurs on account of various reasons including:

- Inadequacy of working/operational gaps in standards of services offered, expected and actual services rendered.
- Technological issues.
- The attitudinal/ behavioral aspects in dealing with the customers.
- Environmental or External changes which further impacts the overall working of internal processes.
- Lack of awareness / information about the product or services with the customers on account of communication gap, misrepresentation by any employee / agent involved.
- Fraudulent activity on part of any of the stakeholder involved.

Customer has the right to register his/her complaint/ grievance if he/she is not satisfied with the services provided by SBI Card. A suitable mechanism must therefore exist for receiving and redressing customer grievances courteously, promptly and satisfactorily. The details of grievance redressal mechanism must be in the domain of public knowledge.

There are various channels through which a customer can lodge his/her grievance – in person by visiting SBI Card office/branch, by telephone, through website/Mobile app/chatbot or by mail/post or by email. If a complaint received via any of the above-mentioned channels is not resolved within the prescribed time frame or he/she is not satisfied with the resolution offered, he/she can approach Nodal officer appointed by SBI Card through email/ letter and if still not satisfied by the response he can approach Banking Ombudsman with his/her complaint or resort to other legal avenues for grievance redressal. Once a complaint has been registered / received by SBI Card, appropriate measures for resolution of the grievances are taken by the business.

2. Grievance registration and touch points

Internal mechanism to handle customer complaints/ grievances

Registration of customer complaints:-

Our customers can register their grievances with us through various touch points: -

1. Dedicated 24*7 call center
2. By writing an email to customercare@sbicard.com

Or Customer can contact customer care through web-based platform

www.sbicard.com/email

OR

mobile app/chat bot

3. Customer can also contact customer care by sending letters through post/courier/fax.

SBI Cards & Payment Services Ltd.

DLF Infinity Towers, Tower C,12th Floor, Block 2, Building 3, DLF Cyber City,
Gurgaon -122002(Haryana) India, Fax no 0124-2567131.

4. Social media channels – like Twitter (Twitter@SBICard_Connect), Facebook etc.
5. Walk-in desk locations

6. Alternate Digital Channels like WhatsApp etc. (only for enquiry and requests).

Guidelines of handling grievances

A Customer Complaint handling process has been put in place to ensure adequacy of response, response time, prompt closure, entry into a tracking system and analysis of recurring issues and trends.

1. While handling the complaints recordkeeping requirements and local laws and regulations must also be adhered to. All customer interaction related to the complaints/ request should be preserved for future reference as per the Company's Document/Record Retention & Disposal Policy. All complaints/grievances are manually recorded in our CRM system when customer contacts any touch point.
2. Customers are provided with the customer reference Id to facilitate follow-up, if required and for future references
3. Acknowledgment is provided to the customer for complaints received
4. Timelines are defined for the resolution
5. Close looping is done by communication of complaint resolution to the customer
6. CRM is updated with every communication – email/letter sent to the customer
7. Periodic reporting and review by senior management
8. Analysis of recurring issues and trends

Grievance & Complaints Classification

The customer care personnel can come across various other types of complaints from Customers other than the types listed below. The list below is an indicative list & not an exhaustive list of complaints. Also, the classifications prescribed by the Authority from time to time shall be adopted and incorporated in the systems. The customer communication with deficiency in product/ services is duly analyzed and when a service deficiency is identified, the same is treated as a complaint.

The categories of complaints are broadly classified as under: -

- I. Technology related: - Account information on website, issues with timely delivery of SMS, IT process related issues
- II. Transaction related: - Transaction Dispute
- III. Delivery related: - Delay in delivery of card(s)/ statements.
- IV. Offers on card: - Delay/dispute on fulfillment of offers including rewards
- V. Payment related: - Delay/Miss in Posting of payments

- VI. Staff related: - Alleged harassment, misbehavior/ use of rude language.
- VII. Bureau Related Complaints

3. Grievance Handling Approach

Grievance Redressal Mechanism

A multi-layered approach for resolution with dedicated centralized team by our service touch points (Query resolution team and Complaint management team) to address, investigate and resolve.

Grievance Redressal Cell

If a customer is not satisfied with the resolution provided by our service touch points, he or she can approach Grievance Redressal Cell by writing to the Nodal Officer. A dedicated team which reviews all such grievances received and provides a resolution to the customer on priority basis. All such Grievances are entered into our Complaint Management System for further resolution.

Nodal Officer is a representative of Customer and ensures appropriate resolution by interfacing with different functions within SBI Card.

Customer can contact Nodal Officer by email, sending letters and also by telephone: -

- **Email:** - Nodalofficer@sbicard.com
- **Helpline:** - 1860-180-7777
- **By Post:**
Nodal Officer, SBI Card
PO Bag 28- GPO,
New Delhi-110001

Responsibilities of Nodal Officer

1. Review the grievances received and resolve in co-ordination with departmental heads
2. Liaise with respective functions for speedy closure of complaint

3. Regularly review and suggest revisions (if needed) in the grievance handling procedures for the company
 4. Nodal Officer would share findings and relevant gaps in the existing processes and work with process owners to put in place corrective actions
 5. The Grievance Redressal Team handles all grievances received
 6. An acknowledgement is sent to the Customer acknowledging his/ her complaint/ grievance on receipt of the complaint/grievance. Simultaneously, Grievance Cell logs an interaction in CRM
7. If the Customer is not satisfied with the resolution provided by grievance cell, the Customer can go for next level of escalation.

Escalation

In the event, the customer is not satisfied with the resolution provided by the above touch points, then he/she can raise his/her grievance by directly writing to the next level:

1. Principal Nodal Officer

In case customer is still not satisfied with the solution provided by Nodal, he or she can write to Principal Nodal Officer with concerns at PrincipalNodalOfficer@sbicard.com.

2. Customer Service Head

Even after getting a response from Principal Nodal Officer, if a customer is not satisfied and wants to further escalate his complaint, he can write to the Customer Services Head @ CustomerServiceHead@sbicard.com

With this multilayered and robust grievance redressal mechanism, the Company not only focuses on redressal but also ensures that the gaps in process are identified and are rectified at grass root level.

3. Ombudsman/Regulator

In the event a customer does not get satisfied resolution by SBI Card within a maximum period of thirty days from the date of lodging complaint, the customer can approach Ombudsman for Redressal of his / her complaint/grievance.

The Grievance Redressal Mechanism and contact details of our Nodal Officer will be displayed on our website and in all our branches.

4. System Support & Tools for Grievance Management

Grievance management is supported by integrated CRM tool. The main functionalities of the system are:

1. Complaint Recording and acknowledgement

All touch points can log a complaint through CRM system. The system generates a Complaint Reference No. which is communicated to the customer.

2. Complaint process for resolution and tracking

Once all touch points log the complaints in the system, the complaint status can be tracked by various stakeholders at any given point of time. MIS is shared with all the relevant stake-holders keeping them informed about the total number of complaints open and their turnaround time. The complaint is then resolved by the respective process owners. The resolution by the respective process owners is also communicated to the customer.

3. View MIS basis Complaint Category, Classification, Turnaround time and by Location

Periodic MIS for review basis complaint category, classification, turnaround time and by location.

4. Turnaround time for complaints and escalations

In case of customer approaching us through any of our contact channel for queries or complaints, we shall initiate a confirmation of the query logged either through phone / email/ SMS immediately and the same shall get resolved either as a First Contact Resolution or as per Turn Around Time defined basis the nature of Request/complaint. In case of customer approaching our corporate center / customer queries or complaints routed through the said office, we shall initiate contact with the complainant within 24 hours and attempt to resolve the query/ complaint on priority basis the nature of the complaint.

Pre-empting occurrence of customer grievance & sensitizing operating staff on handling complaints.

Customer grievance channel and Customer Experience team provides valuable feedback on quality of service and whether the initiatives taken by the Company in technology and reengineering of business processes are having the desired impact on improved customer satisfaction. The Company also understands the importance of sensitizing the staff to handle customer transactions/requests with courtesy, empathy and promptness. CEC (Customer Experience Council) is organized every month (minimum 10 in a year) where representatives of each function and Senior Management interact freely on service related issues. The company shall conduct training programs regularly for staff on customer service and minimizing customer grievances. The Company shall conduct customer satisfaction surveys periodically to understand customer's perception of SBI Credit Card's service and to identify

priority areas for improvement of customer satisfaction. In case of any lapse on account of Customer Service representative, action will be taken as per applicable policy.

5. Review and monitoring process

Periodic Review

MIS is published on periodic basis to all departments. The MIS includes number of complaints received against each department with current status on resolution and timeline for resolution. It also highlights top complaints for the department. MIS is also published to the highest level of senior management including MD&CEO for review on monthly basis along with review at Enterprise Risk Management Committee (ERM/ORMC) (on monthly basis) and Compliance Review Committee (“CRC”) on quarterly basis. Certain Customer Service Metrics may also be shared with the Compliance Function as and when requested for. Quarterly report is shared with the SBICPSL Board as well.

Policy review

This Policy will be reviewed annually or earlier, if necessary. Where the requirements of applicable local laws require a higher standard than those of this Policy/ to the extent that a local law conflicts with the requirements of this Policy, the local law prevails.

6. Liability of the Customers in unauthorized credit card transactions

SBI Card is committed to provide superior and safe customer service experience to all its customers. In order to enable the above, SBI Card has over the years invested in technology and has robust security systems and fraud detection & preventions mechanisms in place to ensure safe and secure experience to its customers.

The Customer Protection policy is designed to ensure customer protection relating to unauthorized transactions resulting in debits to customer’s card. The policy is based on the principles of transparency and fairness in the treatment of customers.

Definitions & Explanations (for the purpose of this policy):

- a. Real loss is defined as financial outgo from customer’s account e.g. debit to customer’s card account
- b. Card Not Present (CNP) transactions are defined as transactions that require use of Card information without card being physically used e.g. e-commerce transactions

- c. Card Present (CP) transactions are defined as transactions that require physical presence of card at the point of transaction. It is also known as face-to-face or a proximity payment transaction e.g. at ATM or shops (POS)
- d. Unauthorized transaction is defined as debit to customer's account without customer's consent
- e. Consent includes authorization of a transaction debit either through standing instructions or based on additional authentication required by SBI Card, such as use of security passwords, input of dynamic password (OTP), use of Card details (CVV/ Expiry date) or any other option provided by SBI Card
- f. Date & time of reporting is defined as date & time on which customer has submitted a unique complaint. The working schedule of the SBI Card would be considered for calculating working days for customer reporting. Time of reporting will be as per Indian Standard Time.
- g. Number of days will be computed based on working days excluding the date of receiving the communication
- h. Notification means an act of the customer reporting unauthorized electronic transaction to SBI Card
- i. Mode of reporting will be the channel through which customer complaint is received first time by SBI Card
- j. Loss in foreign currency if any shall be converted to Indian currency for this policy

Cardholders are advised to immediately contact SBI Card in case the card is misplaced, lost, stolen, mutilated, not received when due or if the cardholder suspects that the credit card is being used without his/her permission. The Cardholder can also block the card instantly on IVR, our website www.sbicard.com or through SMS based service.

In the event of any unauthorized transaction, the Cardholder can raise dispute via several channels such as helpline, website and mobile app. SBI Card shall send immediate response to the Cardholder acknowledging the complaint along with the registered complaint number. SBIC shall record the time and date of delivery of message and receipt of customer's response which shall be used in determining the extent of a customer's liability. Based on nature of dispute, investigation will be done by SBI Card, during which period temporary credit may be posted in certain scenario to the extent of disputed amount, subject to timely submission of required information/documents by the customers. This temporary credit shall be given within 10 working days from the date of such notification by the customer and that would nullify the effect of disputed transaction on the total outstanding. However, based on the outcome of the investigation, the temporary credit may either be made permanent resulting in no liability from cardholder or reversed, where the valid documents are received from Acquiring Merchant Bank or the customer does not challenge validity of the documents.

SBI Card shall arrange to complete the process of investigation within the period, as prescribed under network guidance (i.e. Visa/Mastercard/Rupay/American Express etc.) , from the date of reporting the unauthorized /disputed credit card transaction which will be handled as per chargeback rules laid down by network providers (i.e. Visa/ Mastercard/Rupay/American Express etc.). SBI Card will provide explanation and, if necessary, documentary evidence or

intimation about initiation of second stage to the customer within a maximum period of 90 days from the date of receipt of complaint. subject to response from card network.

Customer will timely submit the completed Transaction Dispute Form, all other necessary information and documents for investigation/ inquiry, as may be required by SBI Card, Network provider and Acquiring Bank. If customer fails to submit or delays submission of necessary information or documents to SBI Card, SBI Card reserves the right to establish liability of the customer in unauthorized credit card transactions, as it may deem fit and proper.

In the unfortunate event of any fraudulent transaction having occurred on the customer's credit card, the following provisions shall apply:

A. Zero Liability of Customer

Customer shall be entitled to full compensation of real loss in the event of contributory fraud/ negligence/ deficiency on the part of SBI Card (irrespective of whether or not the transaction is reported by the customer).

Customer has Zero Liability in all cases of third party breach where the deficiency lies neither with SBI Card nor with the customer but lies elsewhere in the system and the customer notifies SBI Card within three working days of receiving the communication from SBI Card regarding the unauthorized transaction

B. Limited Liability of Customer

In cases where the responsibility for the unauthorized credit card transaction lies neither with SBI Card nor with the customer, but lies elsewhere in the system and when there is a delay of **Four to Seven days** (after receiving communication from SBI Card) on the part of customer in notifying SBI Card of such unauthorized credit card transaction, the per transaction liability of the customer shall be limited to the transaction value or the amount mentioned in below Table in Annexure - 1, whichever is lower.

C. Complete liability of Customer

In cases where the loss is due to negligence by a customer, such as where customer has shared the payment credentials like credit card details, PIN, CVV, OTP or due to improper protection on customer devices like mobile/ laptop/ desktop leading to malware/ Trojan or Phishing/ Vishing attack. This could also be due to SIM deactivation by the fraudster; the customer will bear the entire loss till the customer reports unauthorized transaction to SBI Card. Any loss occurring after reporting of unauthorized transaction shall be borne by SBI Card.

Customer shall be required to get his/her card blocked by calling at the helpline or logging to Web account, Mobile App or by sending SMS. On receipt of request from the customer for blocking of credit card, SBI Card will take immediate steps to prevent further unauthorized transactions in the account.

In cases where the responsibility for unauthorized electronic transaction lies neither with the SBI Card nor with the customer, but lies elsewhere in the system and when there is a delay on the part of the customer in reporting to the SBI Card beyond 7 days, the customer would be completely liable for all such transactions.

Annexure – 1

Maximum Liability of the Customer:

REPORTING TIME	CUSTOMER LIABILITY
Within 3 working days	Zero (Customer is not liable to pay)
4 - 7 working days	a) Credit Limit of Credit Card <=5 lac: <=Rs.10,000 b) Credit Limit of Credit Card >5 lac: <=Rs.25,000
More than 7 working days	*100% (Customer is liable to bear entire loss)

*Further SBI Card may, at its sole discretion, also decide to suitably compensate the customer.

Customer is bound by following obligations:

- (i) Customer shall mandatorily register valid mobile number with SBI Card.
- (ii) Customer shall regularly update his/ her registered contact details as soon as such details are changed. Any failure of customer to update SBI Card with changes shall be considered as customer negligence. Any unauthorized transaction arising out of this delay shall be treated as customer liability.
- (iii) Customer should co-operate with SBI Card investigating authorities and provide all required information and necessary documents.
- (iv) Customer must not share sensitive information (such as Credit Card details & PIN, CVV, Account ID & Password, OTP, transaction PIN etc.) with anyone, including staff of SBI Card.

Notifying SBI Card of the unauthorized transaction:

- Customer shall report unauthorized/disputed transaction to SBI Card at the earliest, with basic details such as Customer name, Card number date & time of transaction and amount of transactions.
- Card blocking will happen automatically once a fraudulent transaction is reported.
- Customer shall share relevant documents/information as needed for investigation viz. cardholder dispute form, copy of passport in case of international transactions and police complaint.

- Fully co-operate and comply with SBI Card reasonable requirements towards investigation and provide details of transaction, customer presence, etc.

Proof of customer liability:

SBI Card has a process of second factor authentication for electronic transactions, as regulated by the Reserve Bank of India. SBI Card has onus to prove that all logs / proofs / reports for confirming two factor authentications are available. Any unauthorized electronic transaction which has been processed post second factor of authentication known only to the customer would be construed as sufficient proof of customer's involvement / consent in effecting the transaction.
