

DOCUMENT SUMMARY

Document Title	Policy on reporting of data to Credit Information Companies (CICs)
Current Version	New Policy
Purpose	This policy outlines the procedures and guidelines on reporting of data to CICs.
Effective from	April 25, 2024 (From the effective date of the applicable regulations)
Document Owner	Chief Operating Officer
Approval	Board of Directors
Applicable regulations	<ul style="list-style-type: none"> • <i>RBI/2023-24/73 DoR.FIN.REC.49/20.16.003/2023-24 Strengthening of customer service rendered by Credit Information Companies and Credit Institutions dated 26th October 2023</i> • <i>RBI/2023-24/72 DoR.FIN.REC.48/20.16.003/2023-24 Framework for compensation to customers for delayed updation / rectification of credit information dated 26th October 2023.</i>
Annexures / Supporting Documents	<p>(a) Illustrative examples of compensation apportioned between CI and CICs</p> <p>(b) Dispute Resolution form</p>

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1. INTRODUCTION

This Policy outlines the procedures and guidelines on reporting of data to Credit Information Companies (CICs) registered with Reserve Bank of India (RBI).

It ensures compliance with regulatory requirements and promotes transparency in credit reporting.

Scope: Applicable to all products offered by the Company.

2. REPORTING OBLIGATIONS

All Credit Institutions shall become members of all CICs and submit data to them. The Company shall report all loans taken by its customers to all four (4) CICs. viz CIBIL, CRIF, Equifax and Experian.

In terms of Regulation 10(a) (ii) of the Credit Information Companies Regulations, 2006, the Company (also referred as Credit Institution (CI)) shall:

- keep the credit information maintained by it, updated regularly on a monthly basis or at such shorter intervals as mutually agreed upon between the credit institution and the credit information company; and
- take all such steps which may be necessary to ensure that the credit information furnished by it, is update, accurate and complete.

The Company shall report the relevant information as per the format prescribed by the CICs.

3. INTIMATION AND ALERTS

The Company shall send alerts in form of SMS/email to customers when submitting information to CICs regarding default or DPD in existing credit facilities wherever the mobile number/ email ID details are available as per the format prescribed by RBI.

In addition to the above, the Company shall organize awareness campaigns to educate their customers about the benefits of providing mobile numbers and email addresses. This empowers customers with the knowledge of how these details can be essential for timely communication regarding their credit information.

4. NODAL POINT/ OFFICIAL

The Company has designated Head-Central Operations as the nodal point/ official to address customer grievances related to Credit information submitted to CIC's. Nodal officer's E Mail ID and Mobile Number is shared with all the aforesaid CICs. Any change in nodal officer shall be communicated to CIC within five (5) calendar days of such a change. Any subsequent change in the nodal officer may be approved by the Managing Director & CEO.

5. DISPUTE RESOLUTION PROCESS

Step 1: Before initiating the dispute, the customer shall get the updated credit report by logging on to the respective CICs website to reduce incorrect disputes.

Step 2: Fill the dispute resolution form (refer Annexure (b) section below) and send it to customercare@hindujaleylfinance.com along with the latest credit report.

HLF shall resolve the complaint as early as possible not exceeding 21 calendar days and will report to the CIC. The process of resolution will be monitored by the Nodal Officer till its closure

Step 3: If the complaint is not resolved within a period of thirty (30) calendar days from the date of the initial filing of the complaint by the complainant with a CI/ CIC, the customer shall be compensated in line with the RBI guidelines (Refer 'Compensation to Customer' section of this Policy).

6. ROOT CAUSE ANALYSIS (RCA) OF COMPLAINTS

The Company shall perform RCA of customer grievances on a half-yearly basis. The Company shall also use, among others, information on data rejected by the CICs and Data Quality Index (DQI) provided by CICs as sources of information for carrying out RCA.

The RCA shall be placed in the Customer Complaints Committee/ RSC for review on an annual basis or any such Management committee comprising of top management personnel. The Company shall identify course correction in the internal process and execute with intent to minimize complaints

7. DATA CORRECTION REJECTION

The Company shall communicate to the Customer the reason for rejection of their request for data correction, where applicable, to enable such customers to better understand the issues in the Credit Information Report (CIR).

8. COMPENSATION TO CUSTOMERS

The compensation framework for delayed updation/ rectification of credit information by the Company/ CI or the CICs in line with the RBI notification is detailed below shall be applicable from 25th April 2024:

- Complainants shall be entitled to a compensation of ₹100 per calendar day in case their complaint is not resolved within a period of thirty (30) calendar days from the date of the initial filing of the complaint by the complainant with a CI/ CIC.

Explanation:

- Section 21 (3) of CICRA, 2005 provides that a complainant may request a CIC or CI to update the credit information by making an appropriate correction, addition or otherwise, and on such request the CI or CIC shall take steps to update the credit information within thirty (30) days after being requested to do so.
- Rule 20 (3) (c) of CIC Rules, 2006 provides that the CI shall forward the corrected particulars of the credit information to the CIC or complainant within a period of twenty-one (21) days from the date when the CI was informed of the inaccuracy in the credit information.

- The combined reading of Section 21(3) of CICRA, 2005 and Rule 20 (3) (c) of Credit Information Companies Rules, 2006 provide the CI and the CIC, collectively, an overall limit of thirty (30) days to resolve/ dispose of the complaint. In effect, this would mean that a CI would get twenty-one (21) days and CICs would effectively get the remainder of nine (9) days for complete resolution of the complaint.
- The Company/CI shall pay compensation to the complainant if the Company/CI has failed to send updated credit information to the CICs by making an appropriate correction or addition or otherwise within twenty-one (21) calendar days of being informed by the complainant or a CIC.
- A CIC shall pay compensation to the complainant if the CIC has failed to resolve the complaint within thirty (30) calendar days of being informed by the complainant or CI, despite the CI having furnished the updated credit information to the CIC within twenty-one (21) calendar days of being informed by the complainant or the CIC.
- The complainant shall be advised by the CI/ CIC of the action taken on the complaint in all cases, including the cases where the complaint has been rejected. In cases of rejection, the reasons for rejection shall also be provided by CI and CIC.
- Compensation to be provided by the CICs/ CIs to the complainant (for delayed resolution beyond thirty (30) calendar days of filing the complaint) shall be apportioned among the CIs/ CICs concerned proportionately. Illustrative examples of the same are given in the Annexure A below.
- Where the grievance/ complaint involves inaccurate credit information provided by more than one CI, the complaint shall be registered by the complainant with the concerned CIC. The CIC shall coordinate with all the CIs concerned and furnish the complainant with a comprehensive resolution of the grievance.
- Where the complaint has been received and registered by a CIC and there has been a delay in the resolution of the complaint, the CIC shall inform the concerned CI(s) and the complainant after the final resolution, regarding total delay (in calendar days) and the amount of compensation to be paid by the CI(s) and/ or CIC.
- Where the complaint has been received and registered by a CI and there has been a delay in the resolution of the complaint, the CI shall inform the concerned CIC(s) and the complainant after the final resolution, regarding total delay (in calendar days) and the amount of compensation to be paid by the CI and/ or CIC(s)
- The date of the resolution of the grievance shall be the date when the rectified Credit Information Report (CIR) has been sent by the CIC or CI to the postal address or email ID provided by the complainant.
- The CICs/ CIs shall make appropriate provision in their complaint submission format for enabling the complainant to submit the contact details, email ID, and bank account details/ Unified Payment Interface (UPI) ID for crediting the compensation amount. The onus of providing accurate details will lie with the complainant and the CIs/ CICs will not be held responsible for any incorrect information provided by the complainant.
- The compensation amount shall be credited to the bank account of the complainant within five (5) working days of the resolution of the complaint.
- The complainant can approach RBI Ombudsman, under the Reserve Bank - Integrated Ombudsman Scheme, 2021, in case of wrongful denial of compensation by CIs or CICs.
- **Non-Maintainability:** The compensation framework shall not be applicable in the following cases:
 - Disputes for which remedy has been provided under Section 18 of CICRA, 2005.

The Section 18 of CICRA, 2005 provides that for disputes arising amongst, CICs, CIs, borrowers, and clients on matters relating to the business of credit information and for which no remedy has been provided under CICRA, 2005, such disputes shall be settled by conciliation or arbitration as provided in the Arbitration and Conciliation Act, 1996.

- Complaints/ references relating to (a) internal administration, (b) human resources, (c) pay and emoluments of staff, and (d) references in the nature of suggestions and commercial decisions of the CIC/CI.
- Complaints pertaining to disputes/ grievances regarding the computation of the credit score/ credit score model.
- Complaints that have been decided by or are already pending in other fora such as Consumer Disputes Redressal Commission, Courts, Tribunals, etc.

9. CONTINUOUS MONITORING

The Company shall regularly monitor the compliance with the framework to improve the efficacy of the grievance redress mechanism and customer service and to avoid any potential compensation or issues related to delayed complaint resolution.

10. ANNEXURE

- a) Annexure A



Illustrative
examples of comper

- b) Annexure B - Dispute Resolution Form



CREDIT
INFORMATION DISP

The Policy was approved by the Board on 15th May, 2024.