



GOBRISK TECHNOLOGIES PRIVATE LIMITED

Customer Grievance Redressal Policy

Version 5
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1. Introduction

GoBrisk Technologies Private Limited (hereinafter referred to as 'BRISKPE') incorporated on February 21, 2023, is a Mumbai-based financial services technology startup.

BRISKPE has set up a strong system for addressing complaints and grievances, allowing Users to seek redress swiftly and efficiently for their concerns. The primary goal of our grievance redressal policy at BRISKPE is to deliver timely and comprehensive resolutions to customer complaints, queries, and grievances. This policy is designed to encompass critical aspects, including the disposal of complaints, handling of grievances, management of chargebacks, and processing of refunds.

BRISKPE has put in place a Grievance Redressal Policy (the 'Policy') duly approved by the Board of Directors encompassing the requirements emanating from the following guidelines:

1. Guidelines on Regulation of Payment Aggregators and Payment Gateways, 2020.
2. PA-CB Regulations.
3. Harmonisation of Turn Around Time (TAT) and customer compensation for failed transactions using authorised Payment Systems, September 20, 2019.
4. Integrated Ombudsman Scheme, 2021; and
5. Online Dispute Resolution (ODR) for Digital Payments, 2020.

For the convenience of all stakeholders, BRISKPE has made the Grievance Redressal Policy accessible on its website/ mobile application along with the details of the Nodal officer. Additionally, BRISKPE has also displayed Frequently Asked Questions (FAQs) on its website/ mobile application for ease of reference to its Users.

2. Key Definitions

The key definitions for the purpose of this Policy are as follows:

1. **Customer/ User/ Complainant:** Refers to Individuals or entities utilising the payment solutions provided by BRISKPE and raising concerns or complaints regarding the services rendered.
2. **Complaint/ Grievance:** Any dissatisfaction or complaint raised by a User concerning the services provided by BRISKPE, including but not limited to transaction-related issues, service-related concerns, etc.

Please note, communications meant to provide suggestions, feedback, queries or clarifications, won't be considered as instances of complaints or grievances.

3. **Nodal Officer:** A designated Individual appointed by BRISKPE to oversee the grievance redressal process, coordinate with relevant departments, and ensure timely resolution of grievances as per the established procedures.
4. **Unique Ticket Number (UTN):** A unique identifier assigned to each User complaint

upon registration, facilitating tracking and monitoring of grievance resolution progress by both the User and BRISKPE.

3. Objectives

The primary objectives of the Grievance Redressal Policy are:

1. To provide Users with equitable, unbiased, and fair treatment.
2. To address all User-related concerns within prescribed timelines.
3. To maintain the fundamental principles of integrity and transparency.
4. To protect Users from fraudulent activities, deception, or unethical conduct.
5. To educate Users about the available avenues and escalation procedures for grievance resolution if they are not satisfied with the resolution.
6. To continually enhance our service quality based on regular evaluations of the grievance resolution framework; and
7. To prevent the occurrence of similar complaints in the future.

4. Grievance Redressal Mechanism

BRISKPE's Grievance Redressal Mechanism is designed to encompass accessible modes for complaint registration, escalation matrix, turn-around time for grievance redressal, etc.

The principal elements of BRISKPE's mechanism for resolving complaints/ grievances are detailed below:

- Complaint Registration: Channels for Complaint Registration

Email	User can email their complaints to BRISKPE's dedicated customer support email id support@briskpe.com
Phone	User can register their complaints on the customer support no. +91-7507412090
WhatsApp	User can register their complaints from their registered mobile number on the customer support no. +91-7507412090
Website	User can fill an online query form at the website www.briskpe.com to register their complaints

- Acknowledgement: BRISKPE will send an acknowledgement email to the complainant **within 24 hours** of receiving a complaint.
- Tracking of Complaints : BRISKPE will assign a Unique Ticket Number ('UTN') to each complainant with the acknowledgement email. The UTN will be used by the complainant to check the status of the resolution on any of the aforementioned channels. In addition, the Customer Support Team will keep the complainant updated on the progress and status of the complaint/ grievance periodically until resolution.

- Monitoring and TAT for Complaint Resolution: Complaints will be monitored regularly for resolution within a time-bound manner, ensuring timely updates are provided to the complainant. Further, complaints will be marked as closed only after resolution. BRISKPE will ensure that complaints are disposed of within 30 working days of its receipt.
- Response to disposal of Complaints: BRISKPE will provide detailed reasons via email for the resolution or rejection of the complaint.
- Appointment of the Nodal Officer :BRISKPE has a designated Nodal Officer responsible to encompass managing regulatory and grievance redressal functions. BRISKPE's website features the particulars of the appointed Nodal Officer.

5. Handling of Grievances

1. Customers can write to us using an online query form at www.briskpe.com to register their complaints.
2. A unique ticket number is assigned for each query or complaint, and customers an email communication.
3. Customers can register or track their queries on support@briskpe.com
4. In our tiered approach for grievance resolution:

Level	Responsible Person	Mode	TAT
Level I	Customer Support	<ul style="list-style-type: none"> • Customer Support Helpline: +91-7507-412-090 Email ID : support@briskpe.com Online Query Form 	Resolution within 2 working days
Level II	Nodal Officer	Kinjal Desai Email: grievance@briskpe.com Phone: +91-91522-98131	Resolution within 7 working days.

6. Filing a complaint with the Integrated Ombudsman

If complaints remain unresolved after reaching Level II, Users have the option to approach the RBI Integrated Ombudsman under the 'The Reserve Bank – Integrated Ombudsman Scheme, 2021.

Address:

Centralized Receipt and Processing Centre,
4th Floor, Reserve Bank of India,

7. Record Maintenance

BRISKPE maintains a comprehensive record of all complaints, encompassing details about the nature of the complaint, the actions undertaken for its resolution, and the corresponding timelines.

8. Turn Around Time (TAT) for resolution

The indicative TAT for the resolution of certain types of complaints are outlined below:

Type of Complaints	TAT Resolution
Onboarding / Registration	Within 4 working days
Change in Businesses / Merchant information including KYC	Within 2 working days
Enquiry about transaction status	Within 2 working days
Settlement not received	Within 2 working days
Beneficiary did not receive the payment	Within 2 working days
Refunds / Returns	Within 5 working days
Chargeback	Within 7 working days
On Hold Transactions	Within 2 working days
Failed transactions	Within 2 working days
Transaction successful, but services not delivered	Within 4 working days
Transaction successful & services also delivered, but the user is not satisfied with the product/services	Within 4 working days
Fraudulent activity	Within 1 working day

Note: The aforementioned TAT depend on prompt responses from any involved third parties, such as Merchants, payment service partners, etc.

9. Harmonisation of Turn Around Time (TAT) and customer compensation for failed transactions using authorized Payment Systems

Sl. no.	Description of the incident	Framework for auto-reversal and compensation	
		Timeline for auto-reversal	Compensation payable
I	II	III	IV
1	Automated Teller Machines (ATMs) including Micro-ATMs		
a	Customer's account debited but cash not dispensed.	Pro-active reversal (R) of failed transaction within a maximum of T + 5 days.	₹ 100/- per day of delay beyond T + 5 days, to the credit of the account holder.

2 Card Transaction			
a	<u>Card to card transfer</u> Card account debited but the beneficiary card account not credited.	Transaction to be reversed (R) latest within T + 1 day, if credit is not effected to the beneficiary account.	₹ 100/- per day of delay beyond T + 1 day.
b	<u>Point of Sale (PoS) (Card Present) including Cash at PoS</u> Account debited but confirmation not received at merchant location i.e., charge-slip not generated.	Auto-reversal within T + 5 days.	₹ 100/- per day of delay beyond T + 5 days.
c	<u>Card Not Present (CNP) (e-commerce)</u> Account debited but confirmation not received at merchant’s system.		
3 Immediate Payment System (IMPS)			
a	Account debited but the beneficiary account is not credited.	If unable to credit to beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
4 Unified Payments Interface (UPI)			
a	Account debited but the beneficiary account is not credited (transfer of funds).	If unable to credit the beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
b	Account debited but transaction confirmation not received at merchant location (payment to merchant).	Auto-reversal within T + 5 days.	₹100/- per day if delay is beyond T + 5 days.
5 Aadhaar Enabled Payment System (including Aadhaar Pay)			
a	Account debited but transaction confirmation not received at merchant location.	Acquirer to initiate “Credit Adjustment” within T + 5 days.	₹100/- per day if delay is beyond T + 5 days.
b	Account debited but beneficiary account not credited.		
6 Aadhaar Payment Bridge System (APBS)			
a	Delay in crediting beneficiary’s account.	Beneficiary bank to reverse the	₹100/- per day if delay is beyond T + 1 day.

		transaction within T + 1 day.	
7	National Automated Clearing House (NACH)		
a	Delay in crediting beneficiary's account or reversal of amount.	Beneficiary bank to reverse the uncredited transaction within T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
b	Account debited despite revocation of debit mandate with the bank by the customer.	Customer's bank will be responsible for such debit. Resolution to be completed within T + 1 day.	
8	Prepaid Payment Instruments (PPIs) – Cards / Wallets		
a	<u>Off-Us transaction</u> The transaction will ride on UPI, card network, IMPS, etc., as the case may be. The TAT and compensation rule of respective system shall apply.		
b	<u>On-Us transaction</u> Beneficiary's PPI not credited. PPI debited but transaction confirmation not received at merchant location.	Reversal effected in Remitter's account within T + 1 day.	₹100/- per day if delay is beyond

10. Settlement Process

1. All inward transactions for a customer should be permitted as per the regulatory guidelines for exports and imports of goods and services.
2. All the pending transactions which require additional documents for processing shall be shown to customers after login to BRISKPE's app or web portal. BRISKPE shall make attempts to send automated/service-initiated reminders to customers.
3. All inward transactions, subject to satisfactory compliance requirements, shall be settled within 5 working days.
4. In the event the customer fails to provide the necessary underlying transaction details i.e. the underlying invoice, shipment/delivery details, Goods/Service Contract copy to ascertain Genuity of the transactions, shall be marked for return to the remitter after 5 working days.
5. The Compliance Team reserves the right to reject and return the processing of any transaction if operations/compliance team ascertains that transaction is outside risk appetite of BRISKPE. Customers shall be informed by way of mail such rejections/return.

11. Disposal of Complaints

Customer Complaint Management Process:

1. We have implemented a systematic process for tracking and promptly resolving customer complaints at BRISKPE.
2. Our objectives include ensuring adequate complaint responses, acceptable response times, complaint closure, and continuous analysis of trends for improvement.
3. Complaints are monitored for resolution within a time-bound manner with regular updates provided to the customer.
4. Targeted Turn Around Times (TATs) for responses are managed within 2 working days, and resolutions within 7 working days from the date of receipt.
5. Customer queries, when service-led deficiencies are identified, are categorized as complaints, and resolved according to the following table:

Customer Queries	Resolution
Enquiry about transaction status or payment	Transaction details and payment status provided
Charge related	Information on charge with a detailed breakup is provided
Buyer Payment not reflecting on app	Receipt status is verified with the concerned bank or payment provider
Credit not reflecting in customer's account	Credit status verified with the concerned bank or payment provider
Mismatch Credit and FIRA Amount	Details of all inward, necessary charges and deduction provided
Return/Refund related	<ul style="list-style-type: none">• For cases where transaction has been rejected by compliance shall be returned to remitter and an email shall be provided to the customer• For cases where return request is received it shall be governed as per Master Direction on Export of Goods and Service ; Master Direction on Import of Goods and Service as per Terms of Services.

12. Management of Chargebacks

1. Chargebacks, the reversal for local payment methods/SWIFT transactions initiated by customers, are managed comprehensively at BRISKPE as per the Master Direction - Export of Goods and Services; Master Direction -Import of Goods and Services.
2. Types of chargebacks and associated remedies are clearly defined.

Chargeback Reason	Description	Remedy
Merchandise not received	Claims of non-provided services or undelivered goods	<ul style="list-style-type: none">• If funds are in Collection A/C, process refund.

		<ul style="list-style-type: none"> If funds are settled, exporter to Request bank to process refund Master Direction -Export of Goods and Service ; Master Direction – Import of Goods and Services as per Terms of Services
Duplicate Processing/ Paid through other means	Payer cancels transaction: refund or credit is due	<ul style="list-style-type: none"> If funds are in Collection A/C, process refund. If funds are settled, Payer to coordinate with Seller/Service Provider directly for refund
Account debited but confirmation not received	Dispute of payment made but not credited: transaction has failed	Provide confirmation of no credit to BRISKPE
Goods not as described	Claims that merchandise doesn't match website/Email/Product Template description	Raise dispute with seller as per UCP under laws of ICC
Return/Refund related	For cases where transaction has been rejected by compliance the customer	shall be returned to remitter and an email shall be provided to

3. For Account-to-Account payments, Chargeback request processing is subject to availability of funds in the collection A/C
4. For Card payments, BRISKPE Chargeback Management System shall oversee dispute stages and participant access (To be developed before product launch).
5. Roles and responsibilities are defined by collection rails providers/bank's guidelines for appropriate dispute resolution.
6. Dispute resolution process includes obtaining supporting documents, resolving disputes, and final resolution based on bank's/payment rail's decisions.

13. Processing Refunds

1. Refunds, originating from various scenarios, are efficiently handled at BRISKPE.
2. Refunds initiated by merchants processed within payment service provider/Bank's timelines.
3. Daily reconciliation is conducted with payment service providers and banks to identify failed transactions and report them accordingly.

14. Governance & Ownership

This Policy is published only in an English Language and is owned by the Head of Customer Support and shall be reviewed at least annually to effect any changes if required, considering any material changes in regulatory framework or for business or operational reasons.

15. Version History

Versions	Author	Date of Approval	Approved By	Change History
1	Rohan Dani	18.10.2023	Board	Created
2	Rohan Dani	01.11.2023	Board	No Change
3	Rohan Dani	28.03.2024	Board	No Change
4	Kinjal Desai	09.05.2025	Board	Updated Master Direction -Import of Goods and Services.
5	Guneshwor Singh Laitonjam	04.12.2025	Board	Added Harmonisation of Turn Around Time (TAT) and customer compensation for failed transactions using authorized Payment Systems