

NOVOPAY SOLUTIONS CONSUMER GRIEVANCE REDRESSAL POLICY

Effective Date: 08/09/2025

1. Introduction

The objective of this Policy is to provide guidelines for processing and resolving the grievance as raised by the consumers in accordance with the provisions of Credit Information Companies (Regulation Act), 2005 (“**CICRA**”) and Credit Information Rules 2006 (“**CIC Rules 2006**”) and other Indian applicable regulations issued by Reserve Bank of India (RBI) from time to time. The Policy applies to all consumers of credit institutions (“**Consumers**”) who access Novopay Solutions Private Limited (“**Trustt**”) services either directly or indirectly, and to all Trustt employees who handle consumer-facing interactions.

2. Objectives

The primary objectives of this Policy are to:

- Provide a consumer-friendly grievance redressal mechanism that is accessible, transparent, and effective.
- Ensure that all grievances, whether classified as queries, requests, or complaints, are resolved within the timelines prescribed under applicable law.
- Implement a structured escalation mechanism, including recourse to the RBI Ombudsman, where required.
- Monitor grievances periodically, conduct root cause analysis, and introduce improvements in service delivery to Consumers.
- Enhance Consumer education on the nature and use of credit information and the rights available to Consumers under CICRA.

3. Scope

This Policy covers all queries, requests, and complaints directly received by Trustt from Consumers.

The Policy does not cover queries, requests, or complaints that:

1. Relate to disputes already pending before courts, consumer fora, or arbitration tribunals.
2. Are raised by unauthorised third parties such as credit repair agencies or “credit clinics” on behalf of Consumers.
3. Are raised by Consumers directly with the credit institutions or credit information company.
4. Relate to disputes pertaining to services of the credit institutions or credit information company.

4. Classification of Interactions

- **Query:** A Consumer request for information or clarification.
- **Request:** An affirmative consumer demand for a specific service relating to its credit information.
- **Complaint:** An expression of dissatisfaction requiring corrective action.

- **Dispute:** A specific type of complaint relating to the accuracy of information contained in a credit report or its summary.

5. Channels for Raising Queries and Complaints

Trustt provides the following channels through which Consumers can raise queries, requests, or complaints. These are designed to be easily accessible and consumer-friendly.

5. **Email:** Complaints may be addressed to legal@trustt.com
6. **Correspondence:** Written complaints may be sent to Novopay Solutions Private Limited, 2nd Floor, NO 18/2A, Khata No 629, Sarjapura Main Road, Bellandur Gate, Ambalipura Village, Bengaluru Urban, Karnataka, 560102.
7. **Escalation Contacts:** Consumers may escalate complaints to the Data Protection Officer at Trustt, at hello@trustt.com
8. **Resolution Timelines:** Trustt will endeavour on a best effort basis to resolve the dispute within 30 calendar days from the receipt of the written grievance.

Disclaimer: For any queries, requests, or complaints pertaining to a credit institutions or credit information companies, Consumers can reach out to the respective credit institution or credit information company.

6. Governance, Monitoring, and Reporting

Trustt will ensure periodic training sessions are conducted for employees handling Consumer grievances.

7. Data Retention

Trustt will maintain all complaint, query or request records securely and confidentially for the period required under applicable law.