

## • **Introduction**

Currently, the Indian Information Technology Act 2000 mandates the secure processing of personal information and prevention of misuse of Information.

On April 11, 2011, India's Ministry of Communications and Information Technology passed the Information Technology (Reasonable Security Practices, Procedures and Sensitive Personal Data or Information) Rules, which deals with practices and procedures for protection and maintenance of Personal Information.

Further, Section 32 of The Personal Data Protection Bill 2019 states that, every data fiduciary shall have in place, the procedure and effective mechanisms to redress the grievances of data principals efficiently and in a speedy manner.

This policy covers all relevant aspects of Grievance Redressal in line with Regulatory requirements as per Information Technology Act 2000 and Personal Data Protection Bill 2019 along with grievances in normal course of business pertaining to service or delivery commitments.

## • **Objectives**

The objective of the policy is to spell out the framework for Grievance Redressal in conformity with Information Technology Act and provisions of Data Protection Bill.

This policy document aims at minimizing instances of complaints and grievances through following means:

- secure data processing
- review mechanism
- ensure prompt redressal of complaints and grievances

In order to make the company's redressal mechanism more meaningful and effective, a structured system has been built, which would ensure that the redressal sought to be offered to the complainant, is just and fair and within the given frame-work of rules and regulations of the IT Act, its corresponding Rules, and provisions of the Data Protection Bill 2019.

The policy document is made available at all relevant forums for awareness of Users. The Grievance Redressal Policy is also hosted on the company's website.

## • **Principles of Policy**

- All Stakeholders shall be treated equally
- Complaints raised by stakeholders to be dealt with promptly and with courtesy

- Stakeholders shall be fully informed of avenues to escalate their complaints / grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response to their complaints
- Organization shall resolve all complaints efficiently and fairly within the regulatory framework

• **Definitions**

<b><u>Sr. No.</u></b>	<b><u>Particulars</u></b>	<b><u>Definition / Description</u></b>
1	Complaint	an expression of dissatisfaction (oral or written) about the provision of, or failure to provide, a financial service
2	Grievance	A grievance (from Latin gravis, meaning 'heavy') is a wrong or hardship suffered, real or supposed, which forms legitimate grounds of complaint. In the past, the word meant the infliction or cause of hardship Types are as below: <ul style="list-style-type: none"> <li>• Individual grievance. One person grieves that a management action has violated their rights under the collective agreement.</li> <li>• Group grievance. A group grievance complains that management action has hurt a group of individuals in the same way. ...</li> <li>• Policy or Union grievance</li> </ul>
3	Grievance Management	Grievance handling is the management of dissatisfaction or complaints (e.g. nepotism, workplace harassment, or wage cuts). By establishing formal grievance handling procedures, you provide an environment for your customers / users to raise their concerns.
4	Channel	a passageway, a means of access for a thing, a communication
5	Stakeholders	Stakeholders shall include Users, Vendors, Advertisers, Customers, Employees which includes A registered user over App / Website through defined channels (This includes both Active and Passive user)
6	Passive User	Non frequent user over App / Website
7	Data Protection Officer	Data protection officers are responsible for overseeing a company's data protection strategy and its implementation to ensure compliance with Data Protection Act requirements
8	Data Protection	Data protection is the process of safeguarding important information from corruption, compromise or loss. The importance of data protection increases as the amount of

		data created and stored continues to grow at unprecedented rates
9	Grievance Officer	An officer handling redressal of customer complaints or grievances other than Data Protection related grievance
10	Personal Data	Personal data means data about or relating to a natural person who is directly or indirectly identifiable, having regard to any characteristic, trait, attribute or any other feature of the identity of such natural person, whether online or offline, or any combination of such features with any other information, and shall include inference drawn from such data for the purpose of profiling
11	Nodal Officer	The employee of a significant social media intermediary, other than the Chief Compliance Officer, who is resident in India
12	Chief Compliance Officer	A key managerial personnel or such other senior employee of a significant social media intermediary who is resident in India

- **Sensitizing operating staff on handling complaints**

We have adopted following approach in sensitizing the staff to handle grievance of users:

- Training to Back end Team
- Awareness sessions of Back end Team
- Appointment of Data Protection Officer
- Appointment of Grievance Redressal Officer
- Defining Turnaround Time for response to grievance of customers / users
- Standard Operating Procedure for grievance investigation
- Defining Turnaround Time for Grievance Redressal
- Defining Escalation Matrix for un-resolved grievances of customers / users
- Periodic Management Review of grievance
- Zero Tolerance Policy for customer data breach
- Customer / User feedback post grievance redressal

- **Enforcement**

We have adopted policy of ensuring optimal customer satisfaction / customer delight and committed to ensure adherence to the same.

Our summary of grievance redressal is as below:

Sr. No.	Month / Week / Day	No. of Grievance received	No. of Grievance resolved


In case of anything which we notice require legal action or non-compliance to regulatory provisions, we do report such content to Statutory / Regulatory Authorities.

We would also highlight below:

Sr. No.	Particulars	Details
1	Total No. of Users as on	
2	Total No. of Active Users as on	
3	Total No. of Passive Users as on	
4	No. of additions in Users	
5	No. of deletions in Users	

The details of communication are as below:

Sr. No.	Particulars	Name	Contact details
1	For service related	YogeshMayekar	Email: info@suffrage.in
2	For account related	YogeshMayekar	Email: info@suffrage.in
3	For content related	YogeshMayekar	Email: info@suffrage.in
4	Anything about Information Security	YogeshMayekar	Email: info@suffrage.in
5	For Others	YogeshMayekar	Email: info@suffrage.in

Escalation Matrix is as below:

Sr. No.	Particulars	Name	Contact details
1	For service related	YogeshMayekar	Email: report@suffrage.in
2	For account related	YogeshMayekar	Email: report@suffrage.in
3	For content related	YogeshMayekar	Email: report@suffrage.in
4	Anything about Information Security	YogeshMayekar	Email: report@suffrage.in
5	For Others	YogeshMayekar	Email: report@suffrage.in

- **Internal machinery to handle complaints**

- (a) Data Protection Officer and Grievance Officer**

- Any questions, discrepancies, and grievances of the Relevant Stakeholders with respect to processing of Personal Data may be made to the Data Protection Officer at <email-id> whose name and contact details are made available above while any other grievances may be raised to Grievance Officer (Details are provided above)
- Authorized person would redress the grievances of relevant stakeholders expeditiously and in any event, within the period prescribed under law.
- Notwithstanding the above, company reserves the right to decline to process any such request which may jeopardize the security and confidentiality of the Personal Data of others, as well as requests which are impractical or not made in good faith, or the circumstances as provided for under the law permitting the company to decline such request(s)

- (b) Mode of Communication**

- The communication for grievance shall be made to appropriate person as mentioned above through email / call.
- Call details are as below:

Sr. No.	Contact Details	Time Duration
1	9867535337	24 hrs
2	9664660093	48 hrs
3	9773261641	72 hrs

- We acknowledge the receipt of grievance immediately by Ticket Reference No. which will be sent over registered email of User / Stakeholder. This shall be reference for any further communications. We fully comply and operate in line with circulars and notifications issued by Government of India on time to time basis. Acknowledgement of any grievance received by Grievance Redressal Officer is done within 24 hours.
- Our Turnaround time is 72 hours for resolving grievance.
- We have defined Escalation Matrix above for convey of grievance or dis-satisfaction in grievance redressal.
- We have also appointed Nodal Officer who is point of contact 24 \* 7 who is in co-ordination with law enforcement agencies and officers to ensure compliance to their orders and requisitions made.
- In case of escalations or non – satisfactory response, you may contact Chief Compliance Officer who is ultimate authority for resolving of grievance.
- We ensure adequate record keeping for minimum 8 years of tenure for all grievance and corresponding redressal.

Sr. No.	Particulars	Mobile	Email
1	Grievance Redressal Officer	9867535337	report@suffrage.in
2	Chief Compliance Officer	9664660093	yogesh.mayekar@suffrage.in
3	Chairman / CEO	9773261641	mandar.jagatkar@suffrage.in

- **Policy details**

<b>Policy name</b>	<b>Grievance Redressal Policy</b>
Version no.	<b>1.1</b>
Prepared by	KunalVaidya
Reviewed by	MandarJagatkar
Approved by	MandarJagatkar

- **Amendment History**

Version no.	Date	Amendment history	Remarks



**SUFFRAGE**