

Transaction Analysts (India) Private Ltd Bangalore

Customer Protection Policy - Unauthorised Electronic Payment Transactions Version 1.0

Customer Protection Policy – Customer Liability In Case Of Unauthorised Electronic Payment Transactions

BACKGROUND:

Transaction Analysts (TA) is committed to provide superior and safe customer service experience to all its customers. In order to enable the above, the TA has invested in technology and has robust security systems and fraud detection and preventions mechanisms in place to ensure safe and secure payment experience to its customers. Keeping in mind the increasing thrust on financial inclusion & customer protection, the Reserve Bank of India had issued a circular on Customer Protection – Limiting Liability of Customers in Unauthorised Electronic Payment Transactions in Prepaid Instruments (PPIs) issued by Authorised Non-banks (RBI/2018-19/101 DPSS.CO.PD.No. 1417/02.14.006/2018-19 dated January 4, 2019) which inter-alia requires PPI to formulate a Board approved policy in regard to customer protection and compensation in case of unauthorised electronic payment transactions. Accordingly TA has formulated the Policy which has been approved by the Board of Directors and extract of the same is furnished hereunder

Limited liability of a customer

A customer's liability arising out of an unauthorised payment transaction will be limited to:

Customer Liability In Case Of Unauthorised Electronic Payment Transactions through a PPI		
Sr No	Particulars	Maximum Liability of the Customers
(a)	Contributory fraud / negligence / deficiency on the part of the PPI issuer, including PPI-MTS issuer (irrespective of whether or not the transaction is reported by the customer)	Zero
(b)	Third party breach ** where the deficiency lies neither with the PPI issuer nor with the customer but lies elsewhere in the system, and the customer notifies the PPI issuer regarding the unauthorised payment transaction. The per transaction customer liability in such cases will depend on the number of days lapsed between the receipt of transaction communication by the customer from the PPI issuer and the reporting of unauthorised transaction by the customer to the PPI issuer -	
	i. Within 3 days#	Zero
	ii. Within 4 to 7 days#	Transaction value or ₹10,000/- per transaction, whichever is lower

	iii. Beyond 7 days	Full Liability
(c)	In cases where the loss is due to negligence by a customer, such as where he / she has shared the payment credentials, the customer will bear the entire loss until he / she reports the unauthorised transaction to TA. Any loss occurring after the reporting of the unauthorised transaction shall be borne by TA.	

The number of days mentioned above shall be counted excluding the date of receiving the communication from the PPI issuer.

****Third Party Breach :**

The following would be considered as Third party breach where deficiency lies neither with TA nor customer but elsewhere in the system:

- a) SIM duplication – Cloning of original SIM to create duplicate SIM
- b) Application frauds
- c) Skimming / cloning
- d) External frauds / compromise of other systems, for e.g. mail servers etc. being compromised

This policy should be read in conjunction with Customer Grievance Policy of TA. Clauses from the TA's Customer Grievance Policy shall form a part of this policy where not specifically addressed in this policy. The policy is available on the following link:
<http://transactionanalysts.com/customer-grievance-policy/>
