

Policy on Handling Customer Complaints

Stripe India Private Limited

September 2022

(Approved by the Board of Directors in its meeting held on September 20, 2022)

A. Overview

The purpose of this Policy is to:

1. outline the channels available for customer complaints, and the procedures for receiving and handling complaints, and dispute settlement in relation to the payment processing services provided by Stripe India to merchants; and
2. inform our customers (i.e. merchants) of their rights to seek alternative remedies if they are not fully satisfied with our response.

B. Definitions

For the purposes of this Policy, the following definitions are applicable:

1. “**customer**” means the user of Stripe India’s payment processing services and other related products;
2. “**customer complaint**” or “**complaint**” means a dispute, grievance or an expression of dissatisfaction communicated to an organisation, related to its payment processing services or other products, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected and/or that claims that the customer has suffered financial loss, material distress or material inconvenience;
3. “**customer support request**” means a customer query or general request for support raised via the channels set out under heading H (General Customer Support and Process) below. For the avoidance of doubt, a customer support request is **not** a customer complaint;
4. “**RBI**” means the Reserve Bank of India;
5. “**Stripe India**” means Stripe India Private Limited;
6. “**TAT**” means turn-around-time.

C. Types of Customer Complaints (Disputes)

By way of illustration, customer complaints may arise, among others, from the following situations:

1. mismatched debit: where the end-user is debited but the customer’s account has not been credited;

2. failed transactions: for reasons that are not directly attributable to the customer, such as disruption of communication links and timed-out sessions;
3. stolen cards: where stolen credit or debit card details are used to make an online purchase from a customer's website;
4. failed credits: which could not be effected to the beneficiary account due to a lack of complete or accurate information;
5. fraudulent transactions;
6. delay in settlement or initiating reversal of transaction charge;
7. gap in services: a gap in the standard of services agreed in the contract and the actual service rendered by Stripe India, in its capacity as a payment aggregator.

D. Classification of Complaints

We have implemented an internal system to classify all complaints using reason codes to enable the proactive identification of grievance themes. This provides increased visibility in respect of product feedback and optimizes operations.

E. Transaction Life Cycle

For domestic processing involving an Indian cardholder and an Indian merchant (i.e. Stripe India customer), the typical transaction life cycle is as follows:

- Cardholder initiates payment to a Stripe India customer;
- Stripe India sends an authorization request for that transaction to its acquiring bank, which does the same with the card network and consequently the card issuer;
- If the transaction is successful, Stripe India will make payment to its customers within the agreed payment cycle. It will separately receive payment from its acquiring bank.

This is merely an example for illustrative purposes and is not intended as a comprehensive overview covering all the different transactions that Stripe India is involved in.

F. Customer Complaints/Escalation Channels

The processes for submitting customer complaints and for escalating customer complaints to the Nodal Officer is set out below:

Level 1: Customer Complaints

A formal complaint should be submitted in writing and should include all relevant details so as to be as clear as possible for efficient and prompt resolution. As an illustration, few typical examples of customer complaints are set out under Section C (Types of Customer Complaints (Disputes)) above.

A customer may also escalate a 'customer support request' (described in Section H below) to a customer complaint only if they are not satisfied with the response provided to the customer support request.

Customers may file a formal complaint through any of the following channels:

1. **Online form:** complete the Complaint Submission Form at <https://stripe.com/complaints>.
2. **Email:** send an email to complaints@stripe.com.
3. **Request for assistance:** during the course of a support inquiry, request our support specialists via the general support channels set out under Section H (General Customer Support and Process) below to file a complaint.

These details are also displayed on Stripe India's website: <https://support.stripe.com/questions/stripe-complaints-in-india>.

The customer will receive an auto-acknowledgement of receipt within **24 hours** of submitting a complaint. The acknowledgement will include a Unique Reference Number (URN) that can be used to track the status of the complaint.

Following that, a more personalized acknowledgement will be issued, including a timeline within which the customer can expect a final response. We strive to provide an initial redressal to the customer complaint within 15 business days of receipt and our final response to complaints within

thirty (30) days of receipt. In the unlikely event additional time is required beyond that, we will advise the customer accordingly, together with the reason(s) for the delay and the expected resolution date.

Level 2: Escalation to Nodal Officer

A customer may escalate a complaint to the Nodal Officer if they are not satisfied with the redressal provided to a complaint submitted via Level 1. Customers may contact the Nodal Officer through any of the following channels:

1. **Post:** Stripe India Private Limited
2nd Floor, WeWork Pavilion, Church Street, Bengaluru 560001, Karnataka, India
2. **Email:** complaints-in@stripe.com
3. **Phone:** 1800 890 2994

These details are also displayed on Stripe India's website:
<https://support.stripe.com/questions/stripe-complaints-in-india>.

The customer will receive an acknowledgement of receipt within **24 hours** of escalating a complaint. The acknowledgement will include a Unique Reference Number (URN) that can be used to track the status of the complaint.

Following that, the Nodal Officer will aim to send a more personalized acknowledgement, including a timeline within which the customer can expect a final response. We strive to provide an initial redressal to the customer complaint within 15 business days of receipt and our final response to complaints within **thirty (30) days** of receipt. In the unlikely event additional time is required beyond that, we will advise the customer accordingly, together with the reason(s) for the delay and the expected resolution date.

G. Procedures for Receiving and Handling Complaints

Upon receiving a complaint, our Regulatory Operations team or Nodal Officer, as applicable, will take ownership and begin an investigation. They will review and assess each complaint and thoroughly investigate the issue(s) raised. Where necessary, further investigation may require review and analysis by one of our global teams:

- At the time of submitting a complaint, minimum details will be sought from the customer to ensure that the process is simple, and the required complete details to resolve the complaint will be internally retrieved based on the information provided by the customer.
- If immediate redressal cannot be provided following acknowledgement of a complaint, we will inform the customer that: (i) the complaint is still under review, (ii) the details of the review process, where relevant, and (iii) the approximate time needed to resolve the complaint.
- When considering the appropriate resolution of a complaint, we will take into account, among other things, the reasonableness of the complaint, the customer's experience with our service, the customer's understanding of Stripe India products, and the Stripe India policies and workflows. Each complaint will also be assessed on an appropriate remedy where relevant and in accordance with applicable law.
- A final response to a customer's complaint (both for Level 1 complaints and Level 2 escalations) will include a timeline of relevant events, an analysis of how the events of the timeline relate to the Stripe Services Agreement, a conclusion on whether we adhered to our policies and, where applicable, a remediation section.
- If a complaint remains unresolved for **thirty (30) days** from receipt thereof, or if the customer is not satisfied with the resolution provided by the Nodal Officer, the customer has the right to approach the RBI Ombudsman under the Integrated Ombudsman Scheme, 2021: https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021_121121.pdf. Complaints under the Scheme shall be registered on the portal (<https://cms.rbi.org.in>), and addressed by our Nodal Officer on behalf of Stripe India through the portal itself
- Should the customer have further questions, require clarification, or refute the findings of our final response, we will review the response and revert within **five (5) days**.

- A customer complaint is considered closed when the customer confirms the issue has been resolved, or if no response is received within **five (5) days** of communicating our final response.
- Occasionally, Stripe India receives negative feedback that does require a resolution or formal follow-up and is not covered by this Policy. Please note that this feedback is valuable to Stripe India even if we cannot reply in all instances.

H. General Customer Support and Process

General customer support will be available for customers 24 hours a day, 7 days a week, through any of the following channels:

1. **Chat:** reach out via chat (available in English) through Stripe India's website: <https://support.stripe.com/contact/login>.
2. **Request a phone call:** request a callback (available in English) by email at support@stripe.com or by entering contact details at support.stripe.com.
3. **User Page:** <https://support.stripe.com/contact/email>

In instances where customers contact us publicly or privately through Twitter (<https://twitter.com/stripe>) and Facebook for customer support requests, we will redirect them to our email support given that sensitive account information may be involved.

Our support specialists will review and assess customer support requests raised through these channels and work towards providing a resolution as soon as possible. If an immediate resolution cannot be provided, the issues will be escalated to internal global teams for further investigation and analysis, as required.

While the general customer support route is typically available for Stripe India's merchants, in the event any consumer, cardholder or individual not directly onboarded or serviced by Stripe India reaches out with any grievance, complaint, or query through the support channels provided by Stripe India, we will strive to assist them as well. In this regard, we will help identify the player who charged

such consumer's card (incorrectly) and re-direct such consumer to the correct player in the payments ecosystem (such as the merchant or issuer bank) for resolution. In such cases, while we will extend reasonable assistance from our end as a matter of good gesture, we will not be bound by the regulatory timelines or escalation matrix prescribed under the RBI guidelines.

I. Escalation Matrix

This escalation matrix summarises the Level 1 (customer complaints) and Level 2 (escalation to the Nodal Officer) channels with a view to addressing customer complaints expeditiously.

Level	Acknowl. (first response)*	TAT (final response)*	Team	Contact details
Level 1: Customer Complaint	24 hours: (auto-ack. with tracking number)	30 days	Regulatory Operations	<u>Channels available:</u> Online form: https://stripe.com/complaints Email: complaints@stripe.com ; or During the course of a support inquiry, request through General Customer Support channels (viz. chat, request phone call, request on user page)
Level 2: Escalate to Nodal Officer	24 hours: (ack. with tracking number)	30 days	Nodal Officer	<u>Channels available:</u> Post: 2 nd Floor, WeWork Pavilion, Church Street, Bengaluru 560001, Karnataka, India E-mail: complaints-in@stripe.com ; or Phone: 1800 890 2994

* From the date of receipt of the complaint through the prescribed channels.

J. Compliance with RBI's Circular on Turn-Around-Time

Stripe India shall adhere to the prescribed framework (to the extent applicable at any particular time) for auto-reversal and compensation for 'failed transactions' (i.e., transactions not fully completed for reasons not directly attributable to a customer such as a disruption of communication links and timed-out sessions) in accordance with the RBI's Circular on the Harmonisation of TAT and Customer Compensation for Failed Transactions using Authorised Payment Systems dated 20 September 2019, as amended from time to time (**Circular**). The Circular may be accessed at: <https://www.rbi.org.in/Scripts/NotificationUser.aspx?Id=11693&Mode=0>.

K. Major Incident or Outage

In the event of a major Stripe India outage or an incident impacting our customers in India, the Operations team will inform customers of the issue(s) via the Stripe Status webpage (<https://status.stripe.com/>) or will notify impacted customers directly via email.

L. Responsible Teams

The Operations team, namely the User Operations team, Regulatory Operations team and the Nodal Officer, will be responsible for customer support requests and resolving customer complaints, supported by Stripe's global cross-functional team(s).

M. Monitoring Mechanism

- **Monitoring.** We have put in place a monitoring system and tooling to understand how internal teams and customers interact with our tools, and to develop a repository of customer issues by frequency and resolution effectiveness. This will provide inputs for our future initiatives, product developments, and scaling projects to improve our customers' experience in using Stripe products.

- **Improve speed and quality of response.** Customer complaints will be tagged with contextually relevant information to help the team respond to common support questions. We are also guided by commonly-used responses to improve response time and accuracy in handling issues.

N. Documentation

Stripe India enters into relevant underlying agreements with merchants, outsourced agencies and other stakeholders, as applicable, in accordance with the applicable legal framework.

O. Review of this Policy

This Policy will be reviewed and updated as and when required in light of material changes to applicable law and/or regulatory requirements in order to ensure it remains accurate and up-to-date.

In the event of a conflict between the provisions of this Policy and relevant RBI circulars, regulations and/or other statutory enactments (**Enactments**), the provisions of such Enactments will prevail over the conflicting provisions of this Policy. Further, the relevant provisions of the Enactments will be deemed to be incorporated into this Policy to the extent applicable, and this Policy should be read in conjunction with the provisions of such Enactments.

Deviations from the standards/procedures specified in this Policy will be permitted only on written approval of the Board of Directors of Stripe India. For the avoidance of doubt, such approval will not be granted if it results in breach of applicable law including any circular, direction, order or guidelines issued by the RBI.

Document Information

Owner	Whitney Russell-Holcomb and Alan Liang (Regulatory Operations-Complaints Handling)
Approver	Board of Directors of Stripe India Private Limited
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Version 1.0	N/A	September 2022

Key roles

Expansion Operations
Regulatory Operations (APAC Complaints Handling)
Nodal Officer and Compliance Officer