

Policy on Handling Customer Complaints

Stripe India Private Limited

July 2024

A. Overview

This Policy on Handling Customer Complaints (“Policy”) applies to Stripe India Private Limited (“Stripe India”) being a Payment Aggregator authorised by the Reserve Bank of India (“RBI”) and extends to all business services offered by Stripe India towards processing domestic transactions and cross-border transactions .

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 for domestic and cross-border transactions.

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 transaction processing involving a cardholder and a 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 customer 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.

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
Prestige Tech Pacific Park, 11th Floor, Building 2, Kadubeesanahalli Village, Varthur Hobli, Bangalore East Taluk, Bangalore - 560103, 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.

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 3: Escalation to RBI Ombudsman

A customer may escalate a complaint to the RBI Ombudsman if they are not satisfied with the redressal provided by the Nodal Officer, as per the [The Reserve Bank - Integrated Ombudsman Scheme, 2021](#). Customers may contact the RBI Ombudsman through any of the following channels:

1. **Online:** File complaint on the CMS portal of RBI at <https://cms.rbi.org.in>;
2. **Physical** (letter/post): in the form as specified in Annexure 'A' in the Scheme addressed to: Centralised Receipt and Processing Centre, 4th Floor, Reserve Bank of India, Sector -17, Central Vista, Chandigarh - 160017; or
3. **Email:** File complaint with prescribed full details to crpc@rbi.org.in.

The salient feature of the RBI Ombudsman Scheme is available [here](#). A copy of the RBI Ombudsman Scheme and its salient features can be requested at the SIPL office at the above mentioned address.

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

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.
- 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 X (formerly 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. For the sake of clarity, Stripe India is not responsible to handle grievances for reasons such as defective/damaged products, failure to deliver goods or services, cancellation of orders, or returns beyond the scope of Stripe India. In such cases, the cardholder or consumer should visit the website of the merchant and raise the complaint with them for appropriate action.

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: Nodal Officer	24 hours: (ack. with tracking number)	30 days	Nodal Officer	<u>Channels available:</u> Post: Prestige Tech Pacific Park, 11th Floor, Building 2, Kadubeesanahalli Village, Varthur Hobli, Bangalore East Taluk, Bangalore - 560103, Karnataka, India E-mail: complaints-in@stripe.com ; or Phone: 1800 890 2994
Level 3: RBI Ombudsman	N/A	N/A	Nodal Officer	<u>Channels available:</u> Online: File complaint on the CMS portal of RBI at https://cms.rbi.org.in ; Physical (letter/post): in the form as specified in Annexure 'A' in the Scheme addressed to: Centralised Receipt and Processing Centre, 4th Floor, Reserve Bank

				of India, Sector -17, Central Vista, Chandigarh - 160017; or Email: File complaint with prescribed full details to crpc@rbi.org.in .
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* 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. Dispute Resolution Mechanism

A dispute (also known as chargeback) occurs when an account owner contacts their bank to contest a payment to the merchant for one of a number of possible [reasons](#). You can learn about disputes through the Stripe Docs here: [Disputes and Fraud](#). The card issuer creates a formal dispute which immediately reverses the payment. There is a dispute resolution process through which the merchant can respond and submit evidence to make their case that the payment was valid. If the dispute is found in the merchant’s favour, the disputed amount is returned to the merchant. If a dispute is upheld, the card issuer's decision is final and the cardholder's payment remains refunded.

The process for disputes is outlined in our Stripe Docs page here: [How disputes work](#). If you believe that the dispute reason is incorrect and want to challenge it, you can upload evidence supporting why the payment was valid [through the Dashboard](#) or [via the API](#). Once you have submitted your evidence,

Stripe will send it to the card issuer for their review. The process for submitting evidence is outlined in our Stripe Docs page here: [Responding to disputes](#).

After the evidence is submitted, the card issuer gives the final decision to both Stripe and the merchant. Stripe updates the status of the dispute to won or lost and notifies the merchant as soon as the issuer makes its decision clear. The outcome is final for all parties (merchant and cardholder).

Some card networks support an arbitration phase for lost disputes that carries a substantial fee, but Stripe does not support this dispute phase.

L. 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.

M. 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).

N. 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.

O. Documentation

Stripe India enters into relevant underlying agreements with merchants, outsourced agencies, financial partners and other stakeholders, as applicable, in accordance with the applicable legal framework. Each of such agreements have mutually agreed resolution mechanisms to resolve disputes pertaining to the scope of relationship / engagement.

P. 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
Legal Entity Applicability	Stripe India Private Limited
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Version History

Version	Description of Change	Date
Version 1.0	Original publication	September 2022
Version 1.1	Annual review	August 2023
Version 1.2	Review and incorporation of necessary changes to align with RBI PA-CB Guidelines	January 2024
Version 1.3	Review and incorporation of necessary changes on account of PA-CB, change in registered office, reference to RBI Integrated Ombudsman level and other internal process changes	July 2024