

Customer Protection Policy on Electronic Banking Transactions (July 2023)

Confidential

DCB Bank Limited

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Customer Protection Policy on Electronic Banking Transactions

Purpose:

To formulate guidelines and lay down the steps for handling claims/ complaints pertaining to Electronic Banking transactions raised under Customer Protection Policy.

This policy will be governed by applicable RBI guidelines and will be subject to change to ensure conformity with changes in regulations, if any.

1. Types of Electronic Banking channels covered in this policy:

Complaints pertaining to PIN / password sharing / compromise for transactions on the below mentioned electronic banking channels will be considered under this Customer Protection Policy.

- i. Debit Cards (including co-branded cards)
- ii. Secured Credit Card
- iii. Mobile Banking
- iv. Personal Internet Banking
- v. Business Internet Banking
- vi. UPI

2. Types of transactions covered in this policy:

- i. Online payment including e-commerce transactions (transactions that does not require physical payment instruments. e.g., internet banking, mobile banking, card not present (CNP) transactions).
- Face-to-face / proximity payment transactions: Transactions which require presence of physical payment instrument such as card for ATM, POS and / or Online transactions.
- 3. **Customer communication channels:** Channels offered by DCB Bank for raising claims / complaints by customers are as under:
 - i. Customer Care contact number 022 6899 7777 / 040 6815 7777: Customer shall have 24 hours telephonic and / or IVR access to raise disputes.
 - ii. Customer care e-mail ID: Customer can raise disputes by emailing to customercare@dcbbank.com from registered email ID.
 - iii. Letter: Customer can write to the Bank at DCB Bank Limited., P.O. Box No.7643, Malad (West), Mumbai 400064.
 - iv. Branch: Customer can approach any DCB Bank branch and raise disputes with branch staff, Corporate Banking customers can raise disputes with respective RM.
 - v. Internet Banking: Customer can log in to Personal Internet Banking or Business Internet Banking and raise disputes.
 - vi. Mobile Banking Customer can raise disputes through Mobile Banking app.



DCB Bank shall further ensure the following communication norms:

- i. Immediate response (including auto response) is sent to the customers acknowledging the complaint along with the registered complaint number.
- ii. The communication systems used to send alerts and receive their responses will record the time and date of delivery of the message and receipt of customer's response, if any.
- iii. Status of complaints will be communicated to customers' registered mobile number / email ID.

4. Customers' and Bank's liability for disputes (claims / complaints):

i. Zero Liability of a Customer

A customer's entitlement to zero liability shall arise where the unauthorized transaction occurs in the following events:

- (i) Contributory fraud / negligence / deficiency on the part of the Bank (irrespective of whether or not the transaction is reported by the customer).
- (ii) Third party breach where the deficiency lies neither with the Bank nor with the customer but lies elsewhere in the system, and the customer notifies the Bank within three working days of receiving the communication (alert) from the Bank about the transaction.

ii. <u>Limited Liability of a customer</u>

A customer shall be liable for the loss occurring due to unauthorized transactions in the following cases:

- (i) If the loss has occurred due to customer's negligence, such as payment credentials (PIN, OTP, passwords, etc) shared by the customer. In such cases the customer will have to bear the entire loss until he reports the unauthorized transaction to the Bank. Any loss occurring after the reporting of the unauthorized transaction shall be borne by the Bank.
- (ii) In cases where the responsibility for the unauthorized electronic transaction lies neither with the Bank nor with the customer, but lies elsewhere in the system and when there is a delay (of four to seven working days after receiving the communication from the Bank) on the part of the customer in notifying the Bank of such a transaction, per transaction liability of the customer shall be limited to the transaction value or the amount mentioned in Table 1, whichever is lower.

Table 1: Maximum Liability of a Customer:

Type of Account	Maximum Liability (₹)
BSBD Accounts	5,000
 All Other SB accounts 	
 Pre-paid Payment Instruments and Gift Cards 	
 Current / Cash Credit / Overdraft Accounts of Individuals with annual 	10,000

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average balance (during 365 days preceding the incidence of fraud) / limit up to Rs. 25 lakh Credit Cards with limit up to Rs. 5 lakh	
 All other Current / Cash Credit / Overdraft Accounts Credit Cards with limit above Rs. 5 lakh 	25,000

Further, if the delay in reporting is beyond **seven working days**, the customer liability shall be determined as per the Board's approved compensation policy for customers. DCB Bank shall provide the details of the customers' liability in this regard at the time of opening the account. DCB Bank will display the approved policy in the Bank's website (www.dcbbank.com) for wider dissemination.

Overall liability of the customer in third party breaches, as mentioned above, where the deficiency lies neither with DCB Bank nor with the customer but lies elsewhere in the system, is summarized in the Table 2.

Table 2: Summary of Customer's Liability:

Time taken to report the fraudulent transaction from the date of receiving the communication	Customer's liability (₹)
Within 3 working days	Zero liability
Within 4 to 7 working days	The transaction value or the amount mentioned in Table 1above, whichever is lower
Beyond 7 working days	As per Bank's Board approved compensation policy for customers

The number of working days mentioned in Table 2 shall be counted as per the working schedule of the home branch of the customer excluding the date of receiving the communication.

5. Reversal Timeline for Zero Liability / Limited Liability of customer:

On being notified by the customer, DCB Bank shall credit (shadow reversal with lien) the amount involved in the unauthorized electronic transaction to the customer's account within 10 working days from the date of such notification by the customer (without waiting for settlement of insurance claim or chargeback, if any). Lien will be removed in only cases, where no customer negligence is observed.

The credit (shadow reversal with lien) will not be made in cases where the customer is negligent. Eg. Password / PIN / OTP sharing.



DCB Bank may also at its discretion decide to waive off any customer liability in case of unauthorized electronic banking transactions even in cases of customer negligence. The credit shall be value dated to be as of the date of the unauthorized transaction. (Matrix for approving shadow credit/ clean credit is in Annexure I)

Further, DCB Bank shall ensure that:

- i. A complaint is resolved, and liability of the customer (if any) established within such time, as may be specified in the Board approved policy, but not exceeding 90 days from the date of receipt of the complaint, and the customer is compensated as per the above-mentioned provisions.
- ii. Wherein DCB Bank is unable to resolve the complaint or determine the customer liability, if any, within 90 days, the compensation as prescribed above is paid to the customer.
- iii. In case of Debit Card / Bank Account, the customer does not suffer loss of interest, and in case of Credit Card, the customer does not bear any additional burden of interest. Therefore, for this purpose the credit shall be value dated (date of the unauthorised transactions).

6. Burden of Proof:

The burden of proving customer liability in case of unauthorized electronic banking transactions shall lie with the Bank.

7. Display of policy:

This policy will be displayed on the DCB Bank website.

8. Reporting and Monitoring Requirements:

The Bank has a suitable mechanism and structure for reporting customer liability cases to the Customer Service Committee of the Board. The reporting shall, inter alia, including volume / number of cases and the aggregate value involved and distribution across various categories of cases, viz card present transactions, card not present transactions, internet banking, mobile banking, ATM transactions, etc.

The Standing Committee on Customer Service in the Bank will periodically review unauthorized electronic banking transactions reported by customers or otherwise, as also the action taken thereon, the functioning of the grievance redressal mechanism and take appropriate measures to improve the systems and procedures. Such transactions shall also be reviewed in the meetings of the Customer Service Committee of the Board.

