



GRIEVANCES REDRESSAL POLICY

1. Introduction & Objective

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CLICKRA SOLUTIONS PRIVATE LIMITED (“Clickra” / “Company”) operates as an authorised Lending Service Provider (“LSP”) and enables borrowers to access loan products offered by partner Non-Banking Financial Companies (“NBFCs”) through digital lending applications / platforms operated by or on behalf of the Company.

This Grievance Redressal Policy (“Policy”) is intended to ensure that borrower complaints and grievances relating to Clickra’s digital lending facilitation services are handled in a prompt, transparent and fair manner.

The objectives of this Policy are to:

- (a) provide accessible channels for grievance submission;
- (b) define clear acknowledgement, escalation and resolution processes;
- (c) ensure appropriate coordination with the relevant partner NBFC where the grievance relates to the underlying loan;
- (d) promote transparency, accountability and responsible customer service; and
- (e) align grievance handling practices with applicable RBI directions and other applicable laws.

For the avoidance of doubt, in relation to the underlying loan, the partner NBFC, being the Regulated Entity (“RE”), remains ultimately responsible for grievance redressal and compliance with applicable RBI requirements.

2. Scope & Applicability

This Policy applies to all individual borrowers who interact with CLICKRA SOLUTIONS PRIVATE LIMITED through its DLAs to apply for or avail short-term consumer loan products offered online. The Policy covers the entire lifecycle of such online loan products, including but not limited to application submission, credit assessment, approval or rejection, disbursal, repayment, foreclosure, issuance of No Objection Certificates (NOCs), customer support interactions, and post-closure processes. This Policy applies exclusively to digital interactions conducted through the Company’s official websites, mobile applications, DLAs and other online communication channels operated by CLICKRA SOLUTIONS PRIVATE LIMITED. For the avoidance of doubt, while the ultimate responsibility for grievance redressal in respect of the underlying loan products rests with the partner NBFC (as the Regulated Entity or RE), the Company, as an LSP, shall facilitate prompt escalation, coordination, and resolution in line with RBI guidelines on RE-LSP arrangements.

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3. Regulatory Framework

This Policy is framed in alignment with applicable regulatory frameworks and directions issued by the Reserve Bank of India from time to time, including those relating to digital lending, fair practices, grievance redressal, outsourcing / RE-LSP arrangements and customer protection.

This Policy also takes into account the Reserve Bank – Integrated Ombudsman Scheme, 2021, as amended from time to time, the Fair Practices Code of the relevant partner NBFC, and other applicable laws including the Consumer Protection Act, 2019 and the Digital Personal Data Protection Act, 2023.

4. Definitions

1. **Borrower** – means any individual who applies for or avails a short-term consumer loan facilitated through the DLAs operated by CLICKRA SOLUTIONS PRIVATE LIMITED, where such loan is sanctioned and disbursed by a partner Non-Banking Financial Company (NBFC). (For the purposes of this Policy and in alignment with RB-IOIS, 2026, "Borrower" is treated as a "Customer" under the Scheme, meaning a person who uses or is an applicant for a service provided by a Regulated Entity.)
2. **Digital Lending Application (DLA)** - means any digital platform, including websites and mobile applications, used for origination, servicing, or collection of loans.
3. **Deficiency in Service** – means a shortcoming or inadequacy in any service which the Regulated Entity (or LSP in facilitation) is required to provide statutorily or otherwise, which may or may not result in financial loss or damage to the customer (as defined under RB-IOIS).
4. **Grievance** – means any complaint, concern, or issue raised by a Borrower in relation to the digital loan facilitation services provided by the Company, including application processing, communication, repayment interface, customer support, data handling, or the conduct of authorised service providers engaged by the Company. (Such Grievances align with the definition of "Complaint" under RB-IOIS, as a written representation alleging a deficiency in service by a Regulated Entity.)
3. **Nodal Grievance Redressal Officer** – means a person authorised by CLICKRA SOLUTIONS PRIVATE LIMITED in accordance with its internal governance framework to handle escalated borrower grievances, ensure timely resolution, maintain grievance records, and oversee compliance with the applicable RBI Guidelines.

5. Types of Grievances Covered

This Policy covers Grievances that may arise in connection with the digital loan facilitation process and the Borrower's experience across the loan lifecycle. Such Grievances may relate to (including but not limited to) the following:

- delays, deficiencies, or lack of adequate communication in relation to loan application processing, status updates, or decision outcomes, where the Company is involved as an LSP;

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- issues relating to disbursal initiation, repayment journeys through digital interfaces, failed transactions, EMI schedule visibility and tracking, or payment confirmations, to the extent handled through the Company's platforms;
- concerns regarding fees, charges, interest-related disclosures, or other amounts reflected to the borrower through the Company's digital interfaces, including alleged non-disclosure, incorrect display, or unauthorised levy (while noting that the loan pricing and sanction terms are determined by the partner NBFC);
- delays or operational issues in loan closure support, issuance/communication of closure confirmation, and No Objection Certificates (NOCs), where the Company facilitates or coordinates such requests with the partner NBFC;
- complaints relating to credit bureau reporting such as incorrect reporting, delayed updates, or dispute handling support, where the Company facilitates borrower requests or coordinates with the partner NBFC;
- mis-selling, misleading representations, or lack of clear and transparent communication of key loan terms, consent flows, or borrower rights through the Company's digital channels;
- harassment, coercive, or otherwise unfair practices in collections, including conduct of authorised collection partners/service providers engaged in connection with the loans;
- data protection and privacy concerns, including unauthorised collection, access, use, sharing, or retention of personal data, and any issues related to borrower consent and disclosures in accordance with applicable law (including restrictions on data storage outside India and minimal data retention by LSPs).

For the avoidance of doubt, Grievances relating specifically to credit sanction decisions, loan approval or rejection, pricing determination, underwriting assessment, or any matter falling within the exclusive regulatory responsibility of the partner NBFC shall ultimately be addressed by the respective NBFC. In such cases, CLICKRA SOLUTIONS PRIVATE LIMITED shall facilitate coordination and ensure that the Grievance is appropriately escalated and tracked to resolution in accordance with applicable regulatory requirements.

6. Grievance Redressal Channels

Borrowers may submit grievances to Clickra through the following official channels:

Email: grievance@clickra.in

Phone: 9187239286

Postal Address:

CLICKRA SOLUTIONS PRIVATE LIMITED

91Springboard, Trifecta, 21, ITPL Main Road, Garudachar Palya,
Mahadevapura, Bangalore North, Bangalore – 560048, Karnataka

These channels shall be accessible during the Company's notified business hours and shall be monitored for timely acknowledgement, logging, escalation and response.

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7. Roles & Responsibilities

The grievance redressal process within CLICKRA SOLUTIONS PRIVATE LIMITED is managed through a structured and tiered mechanism designed to ensure timely and fair resolution.

The Customer Support function acts as the first point of contact and is responsible for acknowledging and addressing grievances received through the Company's official communication channels. Where a Borrower is not satisfied with the initial response, or where the matter requires further review, the Grievance shall be escalated to the authorised Nodal Grievance Redressal Officer, who will independently examine the issue and ensure resolution in accordance with applicable regulatory requirements.

The Company's compliance function monitors grievance trends, resolution timelines, and systemic issues to ensure adherence to the Reserve Bank of India Digital Lending framework and internal governance standards.

In cases where the Grievance relates to matters falling within the regulatory or operational responsibility of the partner NBFC (including credit sanction, underwriting, or pricing decisions), the Company shall facilitate escalation to the respective NBFC and ensure appropriate coordination and tracking until resolution with the RE bearing ultimate responsibility for resolution within 30 days as per RB-IOS.

8. Borrower Communication Standards

All grievances will be acknowledged within forty-eight (48) working hours of receipt. Borrowers will receive periodic updates on the status of their complaint, and once resolved, will be provided with a written explanation detailing the resolution and rationale behind it. Timely and courteous communication is maintained throughout the grievance handling process.

9. Disclosure Requirements

In the interest of transparency, this Grievance Redressal Policy is published on the official website of CLICKRA SOLUTIONS PRIVATE LIMITED. The website and all DLAs also prominently displays the contact details of both the Customer Support Team and the Nodal Grievance Redressal Officer, allowing Borrowers to access the redressal mechanisms easily.

10. Data Protection & Confidentiality

Borrower information and grievance-related data shall be handled in accordance with applicable law, contractual arrangements, Clickra's internal policies and applicable regulatory requirements.

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Such data shall be used only for lawful purposes including grievance handling, escalation, coordination with the relevant partner NBFC, compliance, audit, regulatory reporting, legal defence and internal control purposes, as applicable.

Clickra shall not disclose grievance-related information to unauthorised third parties, except where disclosure is required for lawful grievance handling, coordination with the partner NBFC, compliance with law, regulatory obligation or legal process.

11. Review & Audit of Policy

This Policy shall be reviewed periodically, and at least annually, to ensure continued alignment with applicable law, regulatory expectations and business operations.

Internal review and/or audit processes may be undertaken to assess the effectiveness of grievance handling, quality of borrower communication, escalation discipline, record maintenance and policy compliance.

12. Training & Awareness

All borrower-facing personnel of CLICKRA SOLUTIONS PRIVATE LIMITED receive regular training on the grievance redressal process, including complaint handling, escalation protocols, and borrower sensitivity. Borrowers are also periodically informed through communication campaigns about their rights and the grievance redressal channels available to them.

13. Contact Details of Nodal Grievance Redressal Officer

Nodal Grievance Redressal Officer – CLICKRA SOLUTIONS PRIVATE LIMITED

- Name: Subhajit Gope
- Email: grievance@clickra.in
- Phone: 9187239286
- Postal Address: 91Springboard, Trifecta, 21, ITPL Main Road, Garudachar Palya, Mahadevapura, Bangalore North, Bangalore – 560048, Karnataka.

14. Escalation to RBI Ombudsman

Where a grievance relates to the underlying loan or any matter falling within the responsibility of the partner NBFC, Clickra shall facilitate escalation of the grievance to the relevant NBFC and coordinate appropriately.

If the borrower is dissatisfied with the response of the relevant NBFC, or if no satisfactory response is received within thirty (30) days from the date the complaint is received by the regulated entity, the

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borrower may lodge a complaint under the Reserve Bank – Integrated Ombudsman Scheme, 2021, as amended from time to time, subject to the eligibility conditions of the Scheme.

Complaints may be lodged through the RBI Complaint Management System (CMS) portal.

RBI CMS: <https://cms.rbi.org.in>

Clickra, in its capacity as an LSP, may facilitate coordination and record-keeping where relevant; however, the partner NBFC, being the regulated entity, shall remain responsible for its representation and compliance under the RBI Ombudsman framework.

For the avoidance of doubt, the partner NBFC, as the Regulated Entity, is responsible for representation before the RBI Ombudsman and for compliance with directions issued under the Ombudsman Scheme. CLICKRA SOLUTIONS PRIVATE LIMITED, in its capacity as a Digital Lending Service Provider (LSP), shall facilitate coordination with the concerned NBFC where required and maintain appropriate grievance records in accordance with applicable regulatory requirements, including linkages to the Sachet Portal for cyber-related complaints if applicable and support for Authorised Representatives in Ombudsman proceedings as per the Scheme.

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