Debit Card Issuance Policy

Board Approved Policy for International Private Bank (IPB) India.

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0. Key Data

Summary

As per Reserve Bank of India (RBI), the RBI circular number- RBI/2022-23/92 DoR.AUT.REC.No.27/24.01.041/2022-23 dated April 21,2022, RBI has instructed all banks to prepare and roll out a Board approved policy for Debit card issuance. This policy is in accordance with RBIs instruction and covers the key operating process (KOP) for Debit card issuance for International Private Banking clients in India.

Document category

Group Policy $extsf{D}$ Non-Group Policy $extsf{D}$

Group Procedure \Box Non-Group Procedure \Box

Applicability

DB Group 🛛 Restricted to: International Private Bank in India.

Issuing unit: International Private Bank APAC

Risk type: Regulatory

Risk type authorisation

- (i) Risk type control function, as per DB Group's risk type taxonomy; and/or ⊠
- (ii) Approval by the relevant risk type controller/RTC contact/issuing unit \Box
- (iii) Management Board resolution ⊠
- (iv) Business allocation plan of DB AG \square

Addressees

All staff of IPB India

Management Board approval Date of approval: 30/06/2022

Implementation date: 01/07/2022

 Purpose – The purpose of this document is to seek approval from BMB on the Debit card issuance policy. The debit cards are offered by Deutsche Bank India-("hereafter, 'the Bank') through its business unit, namely – International Private Banking (IPB).

It is also a regulatory requirement as per RBI circular RBI/2022-23/92 DoR.AUT.REC.No.27/24.01.041/2022-23

Board Approved Policy Proposed -

 As per directions from Reserve Bank of India vide circular - RBI/2022-23/92 DoR.AUT.REC.No.27/24.01.041/2022-23 – "Banks shall formulate a comprehensive debit cards issuance policy with the approval of their Boards and issue debit cards to their customers in accordance with this policy. Prior approval of the Reserve Bank is not necessary for banks desirous of issuing debit cards to their customers". To meet the above directions, we are proposing the board approved policy.

2. Scope –

This Board approved policy is applicable to: International Private Banking customers in India.

RBI Guidelines:

3. Issue of Debit card to customers:

- Debit cards will only be issued to customers having Savings Bank/Current Accounts.
- Bank will not issue debit cards to cash credit/loan account holders. However, it will
 not preclude from linking the overdraft facility provided along with Pradhan Mantri
 Jan Dhan Yojana accounts with a debit card
- Bank will not force a customer to avail debit card facility and shall not link issuance of debit card to availment of any other facility from the bank.

4. Other Form Factors -

Bank (International Private Bank, India) is not issuing debit cards under the Other form factors. We only issue Debit card in the physical plastic format (ie EMV Chip cards).

5. Issue of Co-branded Cards -

Bank (International Private Bank) is not issuing Co-branded debit cards to our clients in India.

GENERAL GUIDELINES FOR DEBIT CARDS

6. General Conditions for Issuance of Debit card by RBI

- (a) Bank will keep internal records to enable operations to be traced and errors to be rectified (taking into account the law of limitation for the time barred cases) as prescribed under '<u>Master Direction on Know Your Customer</u>', as amended from time to time.
- (b) The cardholder shall be provided with a record of the transactions after he/she has completed it, immediately in the form of receipt from the ATM and SMS alert will be sent for each transaction. Additionally, bank statements will be sent.
- (c) With a view to reducing the instances of misuse of lost/stolen cards, bank has implemented chip and pin.
- (d) Bank will block a lost card immediately on being informed by the cardholder through any channel will be done immediately on best effort basis.
- (e) Bank has provided multiple channels such as a dedicated helpline, dedicated number for SMS, dedicated e-mail-id, Interactive Voice Response, clearly visible link on the website, internet banking, mobile-app and branch banking for reporting an unauthorized transaction on 24 x 7 basis. It allows the customer to initiate the blocking of the card. The process for blocking the card, dedicated helpline as well as the SMS numbers, will be adequately publicized and included in the bank statements.

- (f) Bank sends a confirmation SMS to the cardholder subsequent to the blocking of a card.
- (g) Bank will not dispatch a card to a customer unsolicited. In case a card is blocked at the request of the customer, replacement card in lieu of the blocked card will be issued with the explicit consent of the customer. Further, bank will send renewed cards only to those customers who have not opted out for receiving cards automatically on renewal date.
- (h) Any discounts, cashbacks, reward points, loyalty points or any other benefits offered by the bank is provided in a transparent manner including source of such benefits. The accounting process for the same shall be verifiable in the books of the banks. Detailed information regarding these benefits shall be displayed on the website of the bank and a copy of the same shall also be provided to the cardholder.
- (i) The same nominee given in the account for which the debit card is issued, any insurance cover provided with a card, Bank will share the that the relevant nomination details with the Insurance Company. The availability of insurance is included, along with other information, in every statement. The information will also include the details regarding the insurance cover, name/address and telephone number of the Insurance Company which will handle the claims relating to the insurance cover.

7. Terms and conditions for issue of cards to customers

- (a) The relationship between the Bank and the cardholder is contractual. Bank will make available to the cardholders in writing, a set of contractual terms and conditions governing the issue and use of such cards. These terms are expressed clearly and also maintain a fair balance between the interests of the parties concerned.
- (b) The terms and conditions for the issue and usage of a card shall be mentioned in clear and simple language (preferably in English, Hindi and the local language) comprehensible to the cardholder.
- (c) Bank will not levy any charge that was not explicitly indicated to the cardholder at the time of issue of the card and without getting his/her explicit consent. However, this shall not be applicable to charges like service taxes which may subsequently be levied

by the Government or any other statutory authority. The details of all the charges associated with cards will be displayed on the Banks website.

- (d) The convenience fee which is currently not being charged however if any charged on specific transactions, will be indicated to the cardholder in a transparent manner, prior to the transaction.
- (e) The time-period for reversal of unsuccessful/failed transactions and the compensation payable for failure to meet the specified timeline will be as per the compensation policy of the Bank.
- (f) The terms may be altered by the Bank, but 30 days' notice of the change shall be given to the cardholder to enable him/her to withdraw if he/she so chooses. After the notice period of 30 days, the cardholder would be deemed to have accepted the terms if he/she had not withdrawn during the specified period. The change in terms shall be notified to the cardholder through all the communication channels available.
- (g) The terms shall put the cardholder under an obligation to take all appropriate steps to keep the card safe and not to record the PIN or code, in any form that would be intelligible or otherwise accessible to any third party if access is gained to such a record, either honestly or dishonestly.
- (h) The terms shall specify that the bank will exercise care when issuing PINs or codes and shall be under an obligation not to disclose the cardholder's PIN or code to anyone, except to the cardholder.

8. Compliance with Other instructions

The issue of cards as a payment mechanism shall also be subject to relevant instructions on cash withdrawal, issue of international card, security issues and risk mitigation measures, card-to-card fund transfers, merchant discount rates structure, failed ATM transactions, etc, issued by the Department of Payment and Settlement Systems, Reserve Bank of India under the Payment and Settlement Systems Act, 2007, and the Foreign Exchange Department, Reserve Bank of India under Foreign Exchange Management Act, 1999, as amended from time to time.

9. Redressal of grievances

- (a) Bank has put in a place a Grievance Redressal Mechanism within the card issuing entity and give wide publicity about it through electronic and print media. The name, direct contact number, email-id and postal address of the designated grievance redressal officer of the Bank shall be mentioned on the credit card bills and account statements. The designated officer shall ensure that grievances of cardholders are redressed promptly without any delay. Specific timelines may be stipulated in the Board approved policy for issuance of cards, redressal of grievances and compensation framework. The grievance redressal procedure and the Board approved policy shall be displayed on the website of the bank with a clearly visible link on the homepage. The same is guided by the grievance redressal policy of the bank
- (b) Bank will ensure that their call centre staff are trained adequately to competently handle and escalate, a complaint, if necessary. The Grievance Redressal process shall have a provision for automatic escalation of unresolved complaints from a call center/base level to higher authorities. There shall be a system of acknowledging customers' complaints for follow up, such as complaint number/docket number, even if the complaints are received over phone.
- (c) Bank will be liable to compensate the complainant for the loss of his/her time, expenses, financial loss as well as for the harassment and mental anguish suffered by him/her for the fault of the bank and where the grievance has not been redressed in time. If a complainant does not get satisfactory response from the card-issuer within a maximum period of one month from the date of lodging the complaint, he/she will have the option to approach the Office of the concerned RBI Ombudsman for redressal of his/her grievance/s. Bank will be guided by the compensation policy for any such compensation to be paid.

10. Confidentiality of customer information

(a) Bank will not reveal any information relating to customers obtained at the time of opening the account or issuing the card to any other person or organization without obtaining their explicit consent, with regard to the purpose/s for which the information will be used and the organizations with whom the information will be shared. Bank will ensure strict compliance to the extant legal framework on data protection. Further, in

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case where the customers give explicit consent for sharing the information with other agencies, bank will explicitly state and explain clearly to the customer the full meaning/implications of the disclosure clause. The information sought from customers shall not be of such nature which will violate the provisions of law relating to maintenance of secrecy in the transactions. The bank will be solely responsible for the correctness or otherwise of the data provided for the purpose.

11. Outsourcing of various services

Bank will ensure adherence to the guidelines on "Managing Risks and Code of Conduct in Outsourcing of Financial Services" as amended from time to time.

12. Compliance with Know Your Customer (KYC) Norms/Anti-Money Laundering (AML) Standards/Combating of Financing of Terrorism (CFT)/Obligation under the PMLA,

2002

The instructions/Directions on KYC/AML/CFT issued by RBI from time to time, shall be strictly adhered to in respect of all cards issued, including co-branded cards.

13. Review of operations

The bank shall undertake review of their operations/issue of debit cards on half-yearly basis. The review shall include, inter-alia,

- Card usage analysis including cards not used for long durations and the inherent risks therein.
- 14. Deutsche Bank Debit Card Issuance KOP -Attached.



Any change in the Debit card Key Operating process (KOP) need to be approved by the following:

- 1. Director and Head of Deposits & Wealth Management Products
- 2. Business Head Private, Personal and NRI Banking
- 3. Product Head Cards & ATMs.

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