

23 Finverse Tele-calling & Customer Communication Policy

Effective Date: [Insert Date]

Last Updated: [Insert Date]

1. Purpose

This Tele-calling & Customer Communication Policy ("Policy") establishes the standards governing all customer communications conducted by **23 Finverse** ("Company", "we", "our", or "us"), including telephonic conversations, WhatsApp messages, SMS, emails, and other electronic communications.

The objective of this Policy is to ensure that all customer interactions are lawful, ethical, transparent, respectful, and compliant with applicable laws and regulations.

This Policy applies to all employees, consultants, customer support representatives, sales personnel, Channel Partners (CPs), Distributor Partners (DPs), Referral Partners, contractors, and any other individuals authorized to communicate with customers on behalf of 23 Finverse ("Representatives").

2. Compliance with TRAI Regulations

All customer communications shall comply with the applicable regulations, directions, and guidelines issued by the **Telecom Regulatory Authority of India (TRAI)** and other competent authorities.

Representatives shall:

- Use only authorized communication channels.
- Follow applicable telemarketing and commercial communication regulations.
- Respect customer communication preferences.
- Cooperate with regulatory audits or investigations where required.
- Immediately discontinue communications that violate applicable regulations.

Any violation of regulatory requirements may result in disciplinary action and may expose the individual to legal consequences.

3. Do Not Disturb (DND) Compliance

23 Finverse respects the communication preferences of customers registered under the National Customer Preference Register (NCPR) or any applicable Do Not Disturb (DND) framework.

Representatives shall:

- Verify communication eligibility before initiating promotional calls or messages.
- Honor customer requests to stop promotional communications.
- Promptly update customer preferences in the Company's systems.
- Avoid repeated contact after an opt-out request has been received.

Transactional or service-related communications may continue where permitted under applicable law.

4. Customer Consent

Marketing or promotional communications shall be sent only where valid consent or another lawful basis exists under applicable law.

Consent should be:

- Freely given.
- Specific.
- Informed.
- Unambiguous.
- Capable of being withdrawn at any time.

Representatives shall not assume consent where it has not been obtained or documented.

5. Calling Hours

Customer calls should be placed only during reasonable business hours and in accordance with applicable regulatory requirements.

Unless otherwise permitted by law or expressly requested by the customer:

- Calls should generally be made between **9:00 AM and 8:00 PM** (local time).
- Repeated calls intended to pressure or harass customers are prohibited.

- Representatives shall discontinue a call immediately if the customer requests not to continue the conversation.

Emergency or service-related communications may be made outside these hours only where legally permissible and operationally necessary.

6. WhatsApp Communication

WhatsApp may be used only through Company-approved accounts and in accordance with applicable laws and platform policies.

Representatives shall:

- Obtain appropriate customer consent before sending promotional messages.
- Use professional language.
- Avoid excessive messaging.
- Respect customer opt-out requests.
- Share only verified and approved Company content.
- Protect customer confidentiality.

Representatives shall not use personal WhatsApp accounts for official customer communication unless expressly authorized by the Company.

7. SMS Communication

SMS communications shall be:

- Sent through authorized messaging platforms.
- Accurate and not misleading.
- Clearly identifiable as originating from 23 Finverse where applicable.
- Compliant with applicable telecom regulations.

Customers shall be provided with a reasonable mechanism to opt out of promotional SMS communications where required by law.

8. Email Marketing

Marketing emails shall:

- Be sent only to recipients with appropriate consent or another lawful basis.
- Clearly identify 23 Finverse as the sender.
- Include accurate subject lines.
- Contain truthful and non-misleading content.
- Provide an accessible unsubscribe mechanism where required.

Transactional emails relating to account activity, security, billing, or customer support may continue irrespective of marketing preferences where legally permitted.

9. Call Recording

To improve service quality, ensure regulatory compliance, resolve disputes, and provide training, customer calls may be recorded.

Where required by law:

- Customers shall be informed that calls may be recorded or monitored.
- Recordings shall be stored securely.
- Access shall be restricted to authorized personnel.
- Recordings shall be retained only for the period necessary to fulfil business, legal, or regulatory requirements.

Unauthorized recording or disclosure of customer conversations is strictly prohibited.

10. Customer Consent Management

23 Finverse shall maintain appropriate records of customer communication preferences where applicable.

Customers may:

- Grant consent.
- Withdraw consent.
- Update communication preferences.
- Request correction of contact information.
- Opt out of promotional communications.

Withdrawal of consent shall not affect communications that are necessary for contractual performance, legal compliance, security, or other lawful purposes.

11. Customer Escalations

Representatives shall handle customer concerns professionally and respectfully.

Where an issue cannot be resolved during the initial interaction, it shall be escalated through the Company's designated escalation process.

Escalations may include:

- Customer complaints.
- Billing disputes.
- Technical issues.
- Service dissatisfaction.
- Data privacy concerns.
- Fraud reports.
- Regulatory complaints.

Representatives shall:

- Document the issue accurately.
 - Escalate without unnecessary delay.
 - Avoid making commitments beyond their authority.
 - Keep customers informed regarding the status of their complaint where appropriate.
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12. Prohibited Scripts and Practices

The following practices are strictly prohibited:

- Making false or misleading statements.
- Promising guaranteed returns, profits, approvals, or benefits that have not been officially authorized.
- Misrepresenting products, services, pricing, or regulatory approvals.
- Concealing important terms, conditions, risks, or fees.
- Using abusive, threatening, intimidating, or coercive language.
- Harassing customers through repeated calls or messages.
- Creating unnecessary urgency or pressure to influence customer decisions.
- Impersonating regulators, financial institutions, or government authorities.

- Collecting sensitive personal information unless required and authorized.
- Sharing confidential customer information with unauthorized persons.
- Using unofficial scripts or marketing materials that have not been approved by the Company.

Only Company-approved communication scripts, marketing materials, and disclosures may be used.

13. Training and Monitoring

23 Finverse may periodically:

- Train Representatives on customer communication standards.
- Monitor calls and communications for quality assurance.
- Conduct compliance reviews and audits.
- Update approved scripts and communication guidelines.
- Take corrective action where non-compliance is identified.

Representatives are expected to participate in mandatory training programs and comply with updated communication standards.

14. Violations

Failure to comply with this Policy may result in disciplinary action, including:

- Coaching or retraining.
 - Written warnings.
 - Suspension of communication privileges.
 - Suspension or termination of employment, engagement, or partnership.
 - Recovery of losses where applicable.
 - Reporting to regulatory or law enforcement authorities where required.
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15. Changes to this Policy

23 Finverse reserves the right to modify or update this Policy to reflect changes in applicable laws, regulatory requirements, operational practices, or business needs.

Revised versions shall become effective upon publication on the Platform or through internal communication.

16. Contact Information

For questions regarding this Policy or to report concerns relating to customer communications, please contact:

23 Finverse

Compliance Team: compliance@23finverse.com

Customer Support: support@23finverse.com

Email: legal@23finverse.com

Registered Office: 5th Floor Esplanade One Mall Rasulgarh Bhubaneswar Odisha 751010