

# **CUSTOMER SERVICE POLICY**

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## **1. INTRODUCTION**

Infomedia is committed to ensuring the provision of high quality customer service and wherever possible provides insights and guidance to all its Merchants and Partners. Infomedia recognises there are opportunities to continuously improve the way customers are engaged and the way compliments, comments and complaints are received, recorded and managed.

## **2. PURPOSE OF THE POLICY**

The purpose of this document is to:

1. set out the operational framework within which we expect our Merchants to provide support to customers; and
2. set the standard which we require our Merchants to meet, in accordance with regulatory and mobile network operator ('MNO') rules and policy
3. explain how we will monitor and manage risk related to customer dissatisfaction

The framework is aimed at putting the customer at the heart of everything that we do, understanding customers and raising the levels of customer satisfaction across all service delivery areas and channels.

## **3. IMPLEMENTATION OF THE POLICY**

This Policy compliments, and must be read alongside, the per-territory and per-MNO details set out in the Infomedia Charge To Mobile Framework (<https://infomedia.co.uk/compliance-legal/frameworks/>) and any contractual terms agreed with Infomedia.

The Framework contains our Customer Promise which will act as a minimum standard upon which individual services should base their own specific standards. The Complaints Procedure together with the methodology of handling these complaints should be consistent across all services delivered through Infomedia.

This Framework will be agreed by the Leadership Team of Infomedia. New Merchants to Infomedia will be made aware of this Policy via the onboarding process and commit to meeting the standards set out in it via their contracts.

A customer service continuous improvement programme may be determined each year by the Infomedia Account Management team and Customer Service representatives of the Merchant based on an analysis of the Customer Service reporting and a review of complaints.

The Customer Services Policy will be reviewed by the Leadership Team on an annual basis to ensure that it is still fit for purpose.

## 4. THE CUSTOMER SUPPORT VALUE AND PROMISE

Infomedia will promote with all Merchants and Partners one simple 'Value' Statement for customer care as follows:

**“Focus on the Customer, listen and treat them with respect, ensuring they understand what is happening. Treat your customers consistently, courteously leaving them with a good impression of their experience”**

To support the Value, we would like all Merchants to agree and make available a promise to all customers:

### Our Promise

We want you to have the best possible experience so we have adopted the following three corporate standards:

- When dealing with our Customers we aim to get it right first time
- When a Customer contacts us, we aim as best we can to deliver on our Promises and Service Specific Standards
- We are here to help. If you (the Customer) do not feel we have helped you, please let us know and we will respond to your comments, compliments and complaints.

**Hello, how can I help you? When you call us, there's the service a customer can expect:**

- You will speak to the right person immediately or after no more than a single transfer
- You will be offered the option of being either transferred or called back if the correct person isn't available
- Your call will be usually be answered within 30 seconds during business hours
- In the event that your call cannot be answered within 30 seconds we will apologise and let you know that we know you are waiting.
- Calls more than 1 minute, or outside of business hours will have a capability for voicemail and call-back options.

**Dear Customer...** When you write to us, email, fax or use a web form we will:

- We will automatically acknowledge any emails so that you know it has been received by us
- We will aim to reply in full to all electronic correspondence such as email or web forms within 2 working days

- We will aim to reply in full to all written correspondence within five working days and if we cannot do that we will give you a time scale for our response or service delivery
- We will tell you the details of who is dealing with your enquiry
- If you have requested an action/service form that may take time to deliver we will keep you informed of progress
- We will not baffle you with jargon when we reply, we will tell you the facts in plain language

**Promises, promises...** If you think we've broken our promises, or you feel we've made a mistake, we take that very seriously

- We will make sure you know how to make your voice heard through our complaints procedure
- We will ensure staff know how to deal with your complaint
- We will acknowledge your complaint within five working days
- We will let you know the progress of your complaint
- We will apologise when we've made a mistake, and quickly take steps to solve the problem
- We will learn lessons from where we've gone wrong to make sure we don't make the same mistakes in the future
- If possible, we will try and resolve your complaint when you first get in touch with us
- If you are not satisfied with our response the appropriate Customer Service escalation point will investigate and respond to you within fourteen days.
- If you remain dissatisfied with our response your complaint can be considered by the Chief Executive within fourteen days.

**Every good turn deserves another...** Now we need your help

Please let us know all the information about your enquiry so we can deal with it effectively and quickly

- We do not tolerate rude and aggressive behaviour. We are polite and respectful to you, and would like the same from our customers
- If you are unhappy with a service please tell us as soon as possible so that we can take steps to remedy the situation
- We demonstrate honesty and integrity in the way we deal with our customers, and we hope our customers will do the same when talking about our services

## 5. COMMENTS, COMPLIMENTS AND COMPLAINTS HANDLING

This section provides guidance on how Infomedia expects customer contacts to be handled. This includes customers...

- Making comments on a service
- Passing compliments on a service
- Making complaints about a service

Capturing feedback from customers is a positive way to establish how well we are doing and will help develop and improve services in the future.

### Comments

We will try to deal with comments at the first point of contact. Many comments will be statements or points of information and may not require a response. If they do require a response we will ensure it is dealt with quickly within the Customer Care Guidelines and normal service procedures. We will thank the customer for their comment. If, upon considering the comment, an action is agreed, we will ensure it is implemented and actioned quickly and, if possible, give appropriate credit.

## Compliments

Satisfied customers who take the trouble to compliment the Merchant on its service should receive an acknowledgement and an indication that thanks and appreciation has been passed on to the staff who provided the service concerned.

## Complaints

What do we mean by a complaint?

Infomedia's definition of a complaint is:

**"an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the service provider or its employees affecting an individual customer or group of customers"**

A complaint does not include:

- Requests for a service to be provided
- Requests to stop a service
- Requests for information or explanation of policy or practice

Some complaints cannot be dealt with under this procedure as they are covered by statutory or legal limitations such as:

1. EE 120 day customer inactivity rule (EE UK only). If a customer has not interacted with a service for at least the first 120 days since subscription that customer must automatically be given a refund if requested without any challenge or request for further information.
2. Supply of Digital Content Cancellation Period (EU only). If a customer requests a refund in the first 14 days of their subscription then they are automatically entitled to the refund regardless of product interaction or any other factors unless they have positively and formally waived their right to cancel in accordance with the legislation.

If there is doubt about whether a Customer's query is a complaint, it shall be processed as such. All Customer Support personnel should be aware of the procedure for internal escalation of complaints and how to seek advice from managers and other senior personnel.

## Unacceptable Actions by Complainants

A small minority of customers make complaints that are vexatious or unreasonably persistent or may act in a way which is inappropriate. Examples include;

- Being threatening or abusive to staff
- Refusing to accept the decision - repeatedly arguing the point and complaining about the decision.

In these instances, such customers will be dealt with by a suitably trained Senior Manager on a case by case basis.

## 6. Vulnerable Customers

### What is a vulnerable customer?

***A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care.<sup>1</sup>***

Vulnerability is not necessarily a permanent or long term state.

It could include illness, disability or mental health condition, learning difficulty, age, low levels of literacy, numeracy or understanding of technology.

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<sup>1</sup> UK Financial Conduct Authority: 'FG21/1 Guidance for firms on the fair treatment of vulnerable customers'

It could also include bereavement, domestic abuse, income shock or relationship breakdown.

Note that these are not exhaustive lists.

## Spotting the signs of vulnerability

Vulnerability comes in a range of guises. It can be temporary, sporadic or permanent. It is a fluid state needing a flexible, tailored response from firms.

Many people in vulnerable situations do not consider themselves 'vulnerable'. They want to retain their independence. They want help, not charity.

It does not just stem from the consumer's situation; it can also be caused or worsened by the actions or processes of firms.

### *Triggers of vulnerability*

Capability is the theme that carries through all of the different triggers. All of the other triggers impact on capability to create vulnerability.

- **Health** – Health conditions or illnesses can affect the ability to carry out day to day tasks. 5% of UK adults say their ability to carry out day to day tasks is reduced a lot by health conditions or illness.
- **Resilience** – This represents the ability to withstand financial or emotional shocks. 30% of UK adults identify as having low financial resilience.
- **Life Events** – Certain major life events may create vulnerability, including bereavement, divorce and redundancy. 19% of consumers say a major life event has happened to them or their partner in the last 12 months.
- **Capability** – Financial capability is the knowledge of financial matters and confidence in managing money. 17% of UK adults have a low financial capability.

Infomedia expects its Merchant and Partners to provide to their customers a level of care at all stages of a customer's service lifecycle that is appropriate to the characteristics and circumstances that is known, or is reasonably knowable, about those customers.

**Known** will be circumstances where a customer, or someone who knows the customer specifically, has communicated directly their vulnerable status

**Reasonably knowable** will be circumstances where a reasonable observer would expect a high probability of a customer to exhibit a certain vulnerability. Examples could be placing advertising on a website designed to be used by children, placing posters outside a hospital, targeting keywords associated with a vulnerability such as 'payday loan', or having a customer ask if relative or friend could speak on their behalf.

Merchants and Partners should understand and record the nature and scale of vulnerabilities that might exist in their target markets, and provide the appropriate training and support to frontline staff to handle these situations.

## Handling Vulnerability

Infomedia expects Merchant's and Partner's CS Agents to be appropriately trained to handle vulnerability. Infomedia uses a globally-renowned training partner Skillcast who offer courses on [Safeguarding the Vulnerable](#).

Once a vulnerability has been identified, it is important to understand how a customer wants to resolve the issues, if any, that they have raised.

In many cases a most generous approach could be taken, being aware that a vulnerable customer may not be capable of completing formal tasks that might otherwise be standard practice, such as completing online forms, responding to emails, providing copies of documents, or even completing PIN verification processes.

In such circumstances Infomedia will encourage merchants to adopt a strategy to minimise the need for such steps, consider fast-tracking the customer to the final step of call resolution, early referral to managerial decision-makers and underwriting to ensure first call resolution.

Merchants should consider the style and contents of their communications to vulnerable customers to ensure that they are as clear and accessible as possible.

*Evidence of Vulnerability:* requesting evidence of vulnerability must be demonstrably necessary and proportional to the issues raised, be as non-intrusive as reasonably possible and use the principle of data minimisation. For example, it would not be proportional to request a copy birth certificate in the event of an allegation of a child subscription. Data must be handled with sensitivity and with full regard to the data protection regulations, legislation and codes of practice of the Territory in which the end user resides.

## **Infomedia & Vulnerable Customers**

Whilst Infomedia is not customer-facing and rarely comes into direct contact with customers, it is recognised that it is important for us to understand how to handle vulnerable customers so that we can support our Merchants and Partners in dealing with vulnerability situations.

The Operations Manager has overall responsibility for ensuring the needs of vulnerable customers are taken into account.

Infomedia has instituted a Vulnerability flag feature pending in CS Lite to allow Infomedia to communicate a customer’s consensually declared vulnerability to Merchants and Partners who may be dealing with that customer in a CS capacity. Whilst all CS Lite Users will be able to raise the flag, only certain Infomedia Users will be able to remove this flag (if a flag has been raised by accident Merchants should contact their Account Manager with details).

Infomedia also has the ability to block a customer from future transactions via its platform. If a Merchant believes a customer is highly vulnerable they should request Infomedia blocks the customer from future transactions.

## **Monitoring Vulnerable Customers**

Infomedia may request copies of Merchants’ Vulnerable Customer Policies as part of its due diligence process (this will be mandatory if a Merchant wishes to offer services in the UK in accordance with the PSA [Vulnerable Customer Guidance](#)), including on due diligence renewal.

Infomedia expect Merchants to monitor their own customer base for vulnerabilities and regularly produce management information setting out in rate of instances of vulnerability, assessment of the handling of such cases and recommendations for improvement of services (including customer care) to ensure that vulnerable customers have a fair outcome with regard to their needs and circumstances.

Infomedia may, from time to time (including as part of a request for information by MNOs and/or regulators) request to see the outcome of vulnerability monitoring.

Infomedia shall also conduct its own monitoring of vulnerable customers and reserves the right to raise incidents up to and including the suspension of service (in accordance with our contractual rights) if customers are suffering harm and detriment as a result of inadequate handling of vulnerabilities.

## **7. CUSTOMER ENGAGEMENT AND CONSULTATION**

Regular consultation and engagement with customers will capture their views on the services they receive and the way they are treated. Services should not be based on assumptions of what the customer wants.

Customer research can take on many forms. At its simplest level, it implies service deliverers “keeping an ear to the ground” and acting on suggestions and comments received. Customer feedback through

such mechanisms as Customers Satisfaction (CSAT) and Net Promoter Score (NPS) for example, are relatively inexpensive to implement. These would give insights to the Customer Experience (Typically CSAT is scored 1-9 and rates the experience of the Customer Call/Interaction) and the Quality of the Service (NPS rates 0-10 and is “how likely would you be to recommend the brand to a friend”).

Customer Service and Contact Centre scripts and processes should be reviewed regularly by the relevant leadership team in response to any feedback from Customers, Merchants or MNO Partners. A review of customer queries should be performed monthly by the relevant leadership and or quality assurance teams to identify opportunities for service improvement and risk mitigation.

## 8. CUSTOMER SUPPORT CHANNELS

Infomedia and Merchants will ensure that customer support services are generally accessible at times and places that are both convenient to customers and meet regulatory standards by offering a choice of channels to get in touch with Merchants, whether that is by telephone or email or through the internet.

The regulatory or MNO policy requirements in relation support channels do vary; Merchant should check the Infomedia Charge to Mobile Framework for full details.

Typical requirements for the different channels are as follows:

### Telephone

If a telephone-based channel is provided this should be manned during local business hours (at a minimum) and in the local language(s). It is strongly recommended that agents are also available for an hour or two before and after business hours on weekdays, and on at least one weekend day. Outside of business hours a voicemail facility should be available, with messages returned within 2 working days (with this SLA included in the messaging to the customer on the call).

The cost to a customer should be no more than a local rate call in their territory, and ideally a toll-free number should be provided.

Straightforward functions could be delivered via IVR, such as service unsubscription.

### Email

Email is the most common support route. All emails should be automatically acknowledged, and the acknowledgment should include the response SLA (2 working days).

Emails should be responded to in the same language that the customer wrote in.

### Customer Support Website

Using a web portal as a starting point for email queries is strongly recommended, accompanied by reasonable SEO to ensure the support site features prominently for typical searches a customer might do in relation to a service.

A support website also provides an opportunity to display service FAQs in a variety of languages, which should help to reduce the number of queries that require direct handling.

It is strongly recommended that a support website includes a straightforward automated form to allow a customer to cancel a service, making use of the Unsubscription API call options that Infomedia provides.

## 9. REFUND POLICY

Customers may have expectations as to the nature of redress they expect where they have not received the level of service that would reasonably be expected, and this will often include refunds of transactions they have made.



Our refund principle is that where it can be shown, on the balance of probability, that something has gone wrong leading to the Customer suffering financial detriment, the Customer should be put back in the position they were in had the problem had not occurred.

Gestures of goodwill are also recognised as a valid method of providing redress where, on a case by case basis, it is determined that direct financial redress is either not sought or not appropriate.

## Refund Situations

There are certain situations where a refund will always be due, either automatically or on request:

**Automatic refunds** – a Customer is not required to make a complaint and/or request a refund for a refund to be processed, or a Customer should be pro-actively offered a refund if they complain

- The end-user was over-charged, charged back-dated, or charged before the renewal date of their subscription;
- The service was not working or never provided;
- The end-user was charged for a subscription service after they initiated a stop request;
- The end-user was charged after complaining a service did not work;
- Any instance of illegal activity (other than illegal activity by the customer);
- An upheld regulator or MNO complaint.

**On Request Refunds** – a Customer will be refunded without question if they or their representatives request a refund in circumstances where:

- The end-user was charged after the maximum time period for user inactivity in accordance with local rules and regulations, such as for payments via EE in the UK users with no activity for 120 days after service commencement (and not including automatic redirection to service after payment).
- The end-user did not receive operational messaging and did not use the service
- The end-user was advertised to and/or subscribed in a manner not permitted or contrary to agreed practice under any Merchant, Infomedia or MNO policy.
- Any other situation where the service was provided in a manner contrary to any Merchant, Infomedia or MNO policy (but short of illegality).
- An end user's vulnerability meant that they were not able to give proper informed consent to be charged, or were not able to end a service when they would otherwise have wished to.

## Administration of Refunds

All refunds should be made via Infomedia's Refund API where available to provide the best and most seamless customer experience unless the customer specifically requests that a refund is made by a different method.

Where refunds are made by another method it must be ensured that the customer agrees to that method, understands the method used and what to expect.

Customers must be refunded in the same currency in which they paid, and any conversion of currency on this basis must not be to the customer's detriment.

Other acceptable refund methods

- Bank Transfer
- Paypal (non-MENA territories only)
- Western Union
- Post Office Payout (UK only)
- Cheque/Postal Order (where available in-territory)

Other local money transfer services may be acceptable; approved on a case by case basis with Infomedia.



Customers must be sent written confirmation of the refund amount, method of refund, any instructions associated with that method, support details, details of the service and MSISDN to which the refund relates. This can be by SMS, email, instant message on a recognised international service to which the customer has access and has agreed to be contacted, or in writing. Copies of such message must be retained against the customer's account and made available to Infomedia upon request.

### Refunds requiring collection

For any refund method requiring the customer to take some positive action to collect the funds, such as refunds via Paypal requiring the accessing of a Paypal account or refunds via Western Union requiring attendance at a branch to collect funds in cash, records must be kept of funds being collected as part of the customer support case and uncollected refunds must be monitored.

Where the refund has not been claimed within 5 working days the customer should be contacted to ensure they are not having difficulties and if necessary offer help or an alternate method. Such contact attempts should be repeated every 3 working days thereafter until the matter is either resolved or, after 28 days of unsuccessful contact the matter should be escalated to a Senior Manager, who will engage with the Payment Method Supplier to attempt final resolution.

### Bulk Refund Process:

Circumstances may arise whereby it is necessary to conduct a bulk refund of customer transactions. This may be necessary as a result of, for example, a technical incident resulting in customer overcharging, a failure of service delivery that cannot be resolved by other methods (such as extending free usage to mitigate the outage) or a payment supplier or regulator instruction.

Bulk refunds must always be associated with an Incident of P2 or higher rating, and will be managed via Infomedia's Incident Management Policy.

## 10. CUSTOMER SUPPORT RISK CONTROL

Infomedia shall monitor customer support performance to the best of its abilities. In some territories, notably the UK, customer performance and risk control statistics and reporting form a part of our contractual obligations to partners and regulators.

### Customer Support Risk Indicators

We shall monitor the number of contacts made with customer support services and will flag up if we believe that the level of such contacts is at risk of exceeding the Customer Support Risk Indicators below.

Infomedia requires that customer support contacts do not exceed the following levels (the 'CS Rate'):

#### For Subscription-based services:

The number of customers contacting customer support does not exceed **2%** of the total number of customers subscribed to a service, per MNO and per Territory over a 30 day period.

#### For One Time Payment Services:

The number of customers contacting customer support does not exceed **2%** of the total number of customers transacting with a service within the preceding 60 days, per MNO and per Territory over a 30 day period.

### Additional Risk Indicators

Infomedia shall also monitor additional Risk Indicators as follows:

#### *Subscription Cancellation Rate*

The Subscription Cancellation Rate or Churn Rate (**C**) is calculated as follows:

$$C = X / (B+N)$$

Where:

**X** is the number of users unsubscribing during the reporting period

**B** is users in base at start of reporting period

**N** is the number of new users acquired during reporting period

The reporting periods Infomedia monitors are:

1. Overall churn rate for a service per week and per month
2. Within 24 hours of subscription
3. Between 24 hours of subscription and the next charge date (not applied to services charged daily)

A service is considered to be at risk if the Churn Rate exceeds 25%.

### *User Interaction*

Infomedia recognises that Merchant services that are in frequent use by customers are typically lower risk than services used less frequently. Merchants are encouraged to take advantage of the tools we offer to allow user service interaction monitoring, and in some Territories it is mandatory to do so (see Data Requirements below).

### **Remediation and Risk Mitigation Procedure**

We shall inform Merchants should we observe that the CS Rate or Churn Rate is within 20% of the Risk Indicator or has trended upwards for a month and expect to agree a remediation plan to ensure the CS Rate is reduced to within acceptable levels.

Should the CS Rate be exceeded we shall require the Merchant to bring the CS Rate down to below the risk indicator level within 1 month. Should this not be achieved Infomedia reserves the right to suspend the service and take any other action as may be appropriate to mitigate the risk of ongoing customer harm in accordance with our Terms and Conditions of service.

### **Risk Data Requirements**

To allow our Merchants to support the accuracy of the customer support data on which Infomedia operates its risk control process, Merchants may integrate with our Update Activity API to report Customer Support Contacts and User Interactions, and in some Territories this is a mandatory requirement. Our Account Managers will ensure that this is correctly implemented during onboarding and service set up.

In the event that it is not technically possible to enable automated reporting, Infomedia requires Merchants operating in territories where it is mandatory to do so to report Customer Support and User Interaction Data to the Infomedia Compliance Team on a weekly basis for ingestion into our reporting suite.

### **How We Report Risk Data**

We shall expose the risk indicator data to Merchants via our Reporting Platform which is updated at least daily and is the same data that we monitor internally. We expect Merchant to take advantage of this tool to identify and act on developing risks proactively without waiting for Infomedia to raise the matter. Please contact your Account Manager to learn more about the Reporting Platform or request additional credentials. Note that only Merchants' own data will be visible.

We are obliged in some territories to present our monitoring data to MNOs and regulators quarterly, annually and on request. Wherever possible we shall inform Merchants when this occurs.

## 11. MNO AND ESCALATED COMPLAINTS HANDLING

From time to time MNOs will contact Infomedia with complaints they have received directly. These typically fall into three categories: carrier first contact and escalated complaints and regulator complaints.

### Carrier First Contact

These are complaints where the customer has contacted the MNO rather the merchant in the first instance. In this scenarios Infomedia will forward the details of the complaint to the designated Customer Support Point of Contact at the Merchant.

### Escalated Complaints

Escalated complaints are typically where a customer has raised a complaint with an MNO after not being satisfied with their initial contact with the Merchant. Such complaints are taken seriously by MNOs. Merchants are expected to proactively contact the customer to resolve their complaint within 24 hours and report back to Infomedia on the outcome in order for us to confirm to the MNO that the complaint has been resolved and the outcome.

### Regulatory Complaints

Regulatory complaints are matters which have been raised by customer to the regulator of phone-paid services in the relevant Territory (details of the various regulatory bodies per territory can be found in the Infomedia Charge To Mobile Framework (<https://infomedia.co.uk/compliance-legal/frameworks/>)). In some Territories the regulator will raise such matters directly with the Merchant or via the MNO and Infomedia. Such complaints are accompanied by a request for information regarding the customer's service, typically including evidence of the customer's consent to be charged for the service, details of how the service was advertised to the customer and a representation of the online purchase flow, transaction and message logs. Where the Merchant has implemented Infomedia's Consent To Charge technology Infomedia can usually deal with such information requests. Otherwise we will request the information from the Merchant which must be provided within the same working day.

## 12. INFOMEDIA CRM: CSLITE

Infomedia makes available to all Merchants and Partners a customer relationship management tool call **CSLite**.

CSLite is a web-based tool enabling users to look up the details of a customer's services, transactions, messages and case history. It also enables users to cancel services, initiate refunds (where Refund API is available and subject to user rights agreed with Merchants) or escalate queries to a configured escalation email address.

CSLite details, instructions and credentials will be provided during Merchant onboarding. Additional credentials are easily available on request (within reasonable limits). Please contact your Account Manager if you wish to learn more about CSLite or obtain additional credentials.

Whilst use of CSLite is not mandatory we strongly recommend that all partners take advantage of the tool to ensure the best possible service is provided to customers.