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GRAINE TRUST CENTER · POLICY

Grievance Redressal Policy

GR-PUB-03 · Version 1.0

Approved — effective 3 November 2026

DOCUMENT ID	VERSION	CLASSIFICATION
GR-PUB-03	1.0	Public

GRAINE AI · MAVRIX AI PRIVATE LIMITED

Document control

DOCUMENT ID	GR-PUB-03
VERSION	1.0
STATUS	Approved
OWNER	Grievance Officer (Rishabh Bhanot)
APPROVED BY	Rishabh Bhanot, Founder (top management), 3 Nov 2026
EFFECTIVE DATE	3 Nov 2026
LAST UPDATED	3 Nov 2026
NEXT REVIEW	By 3 Nov 2027 (12 months after approval), or on a significant change
CLASSIFICATION	Public
APPLIES TO	Any complaint about how Graine handles personal data, or about Graine's compliance with the Digital Personal Data Protection Act, 2023

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1. Purpose

This policy sets up Graine's grievance redressal system. Section 8(10) of the Digital Personal Data Protection Act, 2023 (the "Act") requires a Data Fiduciary to have an effective mechanism to redress the grievances of Data Principals, and section 13 gives every person the right to readily available means of redress. Rule 14(3) of the Digital Personal Data Protection Rules, 2025 (the "Rules") requires the system to be published and to respond **within a reasonable period not exceeding ninety days**, with technical and organisational measures to make that real. Rule 9 requires a published contact. The Rules' duties start on **13 May 2027**; we run this process now.

2. In short

Who to write to	The Grievance Officer, Rishabh Bhanot, at **founders@graine.ai**
We acknowledge	Within **2 working days**
We resolve	Within **30 days** of receipt
The most we ever take	**90 days** from receipt (Rule 14(3)). We never ask you to wait longer
If you are not satisfied	The Data Protection Board of India (section 13), after our process
Cost	None

3. Scope

Who can raise a grievance: any person whose personal data Graine holds or processes, a person they have nominated (Act s.14; Rule 14(4)), or a person who has made a rights request and is unhappy with the answer.

What it covers: how Graine collects, uses, shares, keeps or protects personal data; a rights request not answered or answered wrongly; a consent that was not honoured; a personal data breach; any breach of the Act or Rules by Graine.

Where Graine is the Data Fiduciary: for workspace users, visitors, billing contacts and people who write to us. We decide the outcome.

Where Graine is a Data Processor: for people a customer called or chatted with using a Graine agent, the customer decides. We log your grievance, pass it to the customer within 3 working days, help it respond, and tell you we have done so. The customer's own grievance process also applies. You may still go to the Board against the customer.

4. Roles

ROLE	RESPONSIBILITY
Grievance Officer	Rishabh Bhanot (Founder), appointed on 3 Nov 2026 and resident in India, reached at founders@graine.ai. Receives every grievance; keeps the register; acknowledges, investigates, decides and replies on time; reviews the register monthly. No deputy is named yet; one is planned by 31 Mar 2027
Level 2 review	A grievance the person says was not settled is looked at again from the start. Graine has one founder today, who is also the Grievance Officer, so this review is not by someone uninvolved: he re-examines the grievance afresh and records the reasons for the outcome. An independent reviewer is planned by 31 Mar 2027
Engineering Lead	Gives the Grievance Officer the technical facts and carries out corrections and erasures
Customer	Answers grievances about its own use of personal data, for people it contacted using Graine

5. How to raise a grievance

- **Email:** founders@graine.ai, subject "Grievance".
- **Web form:** on our website at www.graine.ai/privacy-policy, and on the Grievance Officer page at www.graine.ai/grievance-officer. It gives a reference number at once.
- **Post:** The Grievance Officer, Mavrix AI Private Limited, Basement, Rajendra Complex, Naya Bans, Near Union Bank, Sector 15, Noida, Gautam Buddha Nagar, Uttar Pradesh – 201301, India.

Tell us what happened, what you want, and how to reach you, and give an identifier so we can find your data (the email of your account, or the phone number a business used and its name). If you need help to write it down, or need another language or an accessible format, say so and we will help.

6. Policy statements

1. Every grievance receives a reference number and a written acknowledgement within 2 working days.
2. The Grievance Officer decides within 30 days of receipt and never later than 90 days.
3. If more than 30 days will be needed, the Grievance Officer tells the person why, and the date by which they will have an answer, before day 30. That date is never later than day 90.
4. The reply is in writing and plain language. It says what we found, what we did or will do, the reasons if we decline, and how to take the matter further.
5. No one is penalised for raising a grievance, and the grievance is kept confidential to those who need to handle it.
6. There is no charge.
7. A grievance about a personal data breach is also an incident: it is passed to the incident process at once (see the Incident and Breach Notification Commitments).
8. A grievance that shows a wider fault leads to a fix and a change to our controls, recorded in our corrective-action log.

7. Process and time limits

STEP	WHAT HAPPENS	TIME FROM RECEIPT
1. Receive	Reference number issued; entered in the grievance register	At once
2. Acknowledge	Written acknowledgement with the reference number and the date by which we will answer	Within 2 working days
3. Verify	We confirm who is complaining and what the complaint is, asking only what we need	Within 7 days
4. Investigate	The Grievance Officer collects the facts from the systems and people concerned	Within 20 days
5. Decide and reply	Written reply with the outcome, the reasons, and the next step	Within 30 days
6. Extended cases	Written notice of the delay, the reason and a firm date	Before day 30; answer by day 90 at the latest
7. Close	Register updated; correction or erasure carried out; person told	With the reply

8. Escalation

LEVEL	WHO	WHEN
1	Grievance Officer	Every grievance
2	The Grievance Officer, re-examining it from the start (an independent reviewer is planned by 31 Mar 2027)	If you tell us within 30 days of the reply that it did not settle the grievance; we reply within 15 days of your request
3	**Data Protection Board of India**	If our process has not settled it. Section 13 of the Act asks you to use our process before you go to the Board. The Board works as a digital office (Rule 20)

Complaint to the Board (Rule 3(c)(iii)). Once our process has run, you may complain to the Data Protection Board of India, which works as a digital office (Rule 20). The address of the Board's complaint channel is not set out in the Rules. We will add the link here once we have confirmed it from the Board's own official sources; until then, write to us and we will point you to the route the Board has published. If you are in the European Union or the United Kingdom, you may also complain to your local data protection supervisory authority.

9. Records and reporting

The Grievance Officer keeps a register: reference, date received, who, what, which data, the date acknowledged, the date answered, the outcome, and any escalation. The Grievance Officer reviews it monthly: how many are open, closed, older than 30 days and older than 90 days (the target for the last is none), and the common causes. A grievance record is kept as proof that we answered; the retention period is in the Data Retention and Deletion summary. The register holds identifiers and a summary, not more personal data than needed.

10. How this is implemented at Graine (as of 3 Nov 2026)

	STATUS
An email contact for grievances and rights requests, answered by hand by the Grievance Officer	**In place**
This policy, approved on 3 Nov 2026 and published on the Trust Center	**In place**
A web form (www.graine.ai/privacy-policy and www.graine.ai/grievance-officer) that gives a reference number at once, records the 2-day, 30-day and 90-day dates with the grievance and emails it to the Grievance Officer	**In place**
The same register entry, made by hand, for a grievance that arrives by email or post	**Planned** (it starts with this approval; the first monthly review checks it, by 3 Dec 2026)
The monthly review of open grievances by the founders	**Planned** (the first by 3 Dec 2026)
A named Grievance Officer: Rishabh Bhanot (Founder), appointed on 3 Nov 2026	**In place**
A deputy for the Grievance Officer	**Planned** (by 31 Mar 2027)

11. Exceptions and enforcement

No exception to the 90-day limit is allowed. Failure by staff to pass on or answer a grievance on time is handled under Graine's disciplinary process.

12. Review

The owner approves this policy and reviews it at least every 12 months, and after any grievance that reaches the Board.

13. Framework mapping

FRAMEWORK	REFERENCE
DPDP Act 2023 and Rules 2025	Act s.8(10), s.13, s.14; Rule 3(c)(iii), Rule 9, Rule 14(3), Rule 14(4), Rule 20
GDPR	Arts. 12(3), 77
SOC 2 (privacy criteria, if added)	P8.1
ISO 27001	A.5.34; cl. 10.2

Contact

founders@graine.ai, for the attention of the Grievance Officer. Mavrix AI Private Limited, trading as Graine AI (CIN U62099KA2025PTC210316).

Revision history

VERSION	DATE	CHANGE	APPROVED BY
1.0	2026-11-03	First issue, approved	Rishabh Bhanot, Founder