



## EXTERNAL COMMUNICATION AND GRIEVANCE PROCEDURES

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### Version Control

| Version | Date               | Author                            | Rationale                                                        |
|---------|--------------------|-----------------------------------|------------------------------------------------------------------|
| 1.0     | 24 June, 2025      | Roshni Venkatesh                  | Adoption of the policy and procedures                            |
| 1.1     | 21 September, 2026 | Roshni Venkatesh and Sonia Thomas | Amend the policy to add escalation matrix for dispute resolution |





## 1. Policy Statement

Nasadiya Technologies Private Limited (hereinafter the “**Company**”) is committed to providing a safe, respectful, and legally compliant digital environment across its Pratilipi platforms including Pratilipi Literature, Pratilipi Comics, or Pratilipi FM (“**Pratilipi Platforms**”). This External Communication and Grievance Procedure is prepared pursuant to Rule 3(2) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, and Rule 75 of the Copyright Rules, 2013 to ensure that grievances or complaints from users, vendors, copyright owners or any other aggrieved party (“**Complainant**”) are addressed promptly and fairly.

## 2. Policy Scope

This policy applies to all Complainants who wish to:

- (i) Report content in violation of our policies or applicable laws;
- (ii) Raise concerns regarding privacy, misuse of data, impersonation, or content that affects their rights;
- (iii) Submit grievances related to copyright infringement, takedown requests, or intermediary obligations or any other grievance;
- (iv) Contractual disputes, vendor service grievances, procurement issues, or operational non-compliance; and/or
- (v) Any other dispute, grievance, or harm arising from interaction with Pratilipi Platforms, or otherwise with the Company.

## 3. Process

### a. Types of Grievances Complainant Can Report

Complainants may raise grievances about, including but not limited to:

- (i) Prohibited and Harmful Content: Content that is unlawful and is harmful to children.
- (ii) Privacy and Personal Rights: Concerns regarding unauthorized disclosure of personal information or violations of personality rights.
- (iii) Intellectual Property and Takedowns: Copyright or trademark infringement complaints, takedown requests, and intermediary compliance obligations.
- (iv) Commercial and Vendor Operations: Disputes related to vendor agreements, service delivery, billing, or operational non-compliance.
- (v) User Conduct and Platform Safety: Reports of user harassment, abuse, threats, spam, or violations of the terms of use of the Pratilipi Platforms.
- (vi) General and Consumer Grievances: Any other consumer complaint arising from interactions with Pratilipi Platforms or the Company’s operations.

### b. Grievance Reporting

Complainant can submit a grievance or complaint through the following channels depending on the nature of the grievance. All grievances will be reviewed in accordance with the applicable process, and the Complainant will receive a response or resolution from the



designated Company representative.

(A) Platforms, Users and Content-Related Grievances

This Part applies to all user, platform and content-related grievances across the Pratilipi Platforms. For Pratilipi Literature platform, grievances shall be addressed in accordance with the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021.

Primary Reporting:

Grievances relating to the Pratilipi Platforms, its users and the content:

Grievances relating to the concerns arising from or in relation to the use of Pratilipi Platforms or the users of the Pratilipi Platforms or any content related grievance, can be raised by a Complainant through the in-application grievance redressal mechanism available on the respective platform. Such grievances will be directed to the authorized representative of the Company ("**Nodal Officer**").

Grievances relating to Copyright Infringement:

1. If Complainant (as a copyright owner or an exclusive licensee) believes that his/her work has been used on one of the platforms of Pratilipi in a manner that constitutes copyright infringement, a written grievance may be submitted to the Company through the [Form](#) under Section 52(1)(c) of the Copyright Act, 1957 and Rule 75 of the Copyright Rules, 2013.
2. The grievance should include:
  - a) Description of the copyrighted work,
  - b) Proof of ownership or exclusive license,
  - c) Evidence that the allegedly infringing content is not authorized by the Complainant or otherwise permitted under the Copyright Act, 1957,
  - d) The exact URL/location of the infringing content,
  - e) Identity of the uploader, if known, and
  - f) An undertaking to file an infringement suit and obtain a court order within 21 days.
3. If satisfied, the Company will disable access to the content within 36 hours and maintain the takedown for 21 days. If a court order is not received within the prescribed period, access of the disabled content may be restored. The Complainant must note that repeated complaints/notices in relation to the same work and location without a court order will not be entertained.

Escalation:

If the grievance is not resolved by the Nodal Officer within 60 (sixty) days or such other the resolution period as prescribed under applicable law, from the date on which the grievance was submitted or if the Complainant is not satisfied with the resolution provided, the Complainant may escalate/ appeal the grievance and submit the same in writing to the





Grievance Officer – Mr. Jitesh Donga at [contact@pratilipi.com](mailto:contact@pratilipi.com) by including the below details:

- (i) Complainant's full name and contact information (email and/or phone);
- (ii) Description of the content or issue you are reporting;
- (iii) Specific URL(s), screenshots, or other identifying information;
- (iv) Proof of identity (only if requesting removal of personal or sensitive content); and
- (v) Any additional documents or information to support your claim.

(B) Other External Grievances

This Part applies to grievances raised by external stakeholders in relation to the Company's business relationships, commercial dealings, products, services, consumer related matters and other operational matters.

Primary Reporting:

The Complainant may submit their grievance by filling out the [Form](#) and providing all relevant details.

|                      |                                                                                                                                                                                                                                                                                      |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Personal Information | <ul style="list-style-type: none"><li>- Full Name</li><li>- Contact Information (Email or Mobile)</li><li>- Designation within the Company</li></ul>                                                                                                                                 |
| Details of Grievance | <ul style="list-style-type: none"><li>- Nature of grievance/ complaint</li><li>- Clear and concise description of the grievance or the issue at hand</li><li>- Specify details including dates, and times related to the grievance</li><li>- Names of individuals involved</li></ul> |
| Supporting Documents | <ul style="list-style-type: none"><li>- Any relevant documents that support their grievance</li><li>- Photos or videos, if applicable and relevant</li></ul>                                                                                                                         |
| Timeline of events   | <ul style="list-style-type: none"><li>- A chronological timeline of events leading up to and following the grievance</li></ul>                                                                                                                                                       |

Upon submission of the grievance through the said [Form](#), the same shall be reviewed by an authorized representative of the Company ("Nodal Officer"). The details of the grievance shall be then investigated by the Grievance Officer or by such person designated by the Grievance Officer.

Where a grievance submitted under this Section pertains to Platform, User or Content-Related Grievances (as detailed under Clause A above), the Company may, at its discretion, transfer the grievance to be reviewed as per the appropriate grievance redressal mechanism or request the Complainant to resubmit the grievance through the prescribed channel under Point 3 (b) (A).

Escalation:



If the grievance is not resolved within 60 (sixty) days or such other the resolution period as prescribed under applicable law, from the date on which the grievance was submitted or if the Complainant is not satisfied with the resolution provided, the Complainant may escalate/appeal the grievance and submit the same in writing to Mr. Sankaranarayanan D. (“**Grievance Officer**”) at [founders@pratilipi.com](mailto:founders@pratilipi.com) by including the below details:

- (i) Complainant’s full name and contact information (email and/or phone);
- (ii) Description of the content or issue you are reporting;
- (iii) Specific URL(s), screenshots, or other identifying information;
- (iv) Proof of identity (only if requesting removal of personal or sensitive content); and
- (v) Any additional documents or information to support your claim.

#### 4. Grievance Resolution Timelines

The Company shall process grievances in accordance with the timelines set out below. Where a timeline is prescribed under applicable law, such statutory timeline shall prevail.

| Type of Grievance                                                                                 | Acknowledgement Time    | Resolution / Action Time                                                            |
|---------------------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|
| Sensitive content (e.g., private parts, nudity, sexual acts, deepfakes, electronic impersonation) | Immediate               | Disable/remove content within 2 hours from receipt of grievance                     |
| Copyright infringement (as per Section 52(1)(c) and Rule 75)                                      | Within 24 hours         | Restrict access within 36 hours; maintain takedown for 21 days or until court order |
| Grievance under applicable laws                                                                   | Within 24 working hours | Respond within 15 days from the receipt of grievance                                |

#### 5. Confidentiality

The Company is committed to handling all grievances and grievances submitted under this policy with due care and discretion. Information received from a Complainant will be used solely for the purpose of addressing the grievance and will not be disclosed to any third party except to the extent necessary for the resolution of the grievance or as required by applicable law or by order of a competent court or government authority.

#### 6. Safeguards Against Misuse

To avoid misuse of this process:

- (i) The Company may require identity verification in sensitive or legal cases;
- (ii) Malicious or knowingly false grievances may lead to suspension of access or legal consequences; and
- (iii) Repeat grievances without legal backing may not be entertained.





## 7. Anti-retaliation (Protection and Support for Complainants)

The Company is committed to ensuring that no Complainant who has raised a grievance in good faith under this Policy is subjected to retaliation. If a Complainant believes they have been subjected to retaliation, they may bring this to the attention of the applicable Grievance Officer, who shall take appropriate steps.

However, where a grievance is found to be knowingly false, frivolous, vexatious, malicious, or submitted in bad faith, the Company reserves the right to take appropriate action in accordance with applicable law and its policies, including restricting or suspending access to the Pratilipi Platform/s, where applicable.

## 8. Amendments

This policy shall be reviewed annually and may be amended, by the Company, at any time, in its sole discretion and/or if required under applicable law.

