



Qyrus Incorporation
1 South Wacker Dr. Suite 3150, Chicago,
IL, 60606.
Document Name: DISPUTE RESOLUTION POLICY



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DISPUTE RESOLUTION POLICY

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1. Purpose

The purpose of this policy is to establish a structured, transparent, and timely process for receiving, investigating, resolving, documenting, and monitoring disputes raised by customers, employees, vendors, business partners, regulators, or other stakeholders relating to Qyrus products, services, information security, privacy, contractual obligations, or regulatory compliance.

This policy ensures disputes are managed fairly, consistently, confidentially, and in accordance with applicable legal, contractual, and regulatory requirements.

2. Scope

This policy applies to:

- All Qyrus employees
- Contractors
- Consultants
- Temporary staff
- Third-party service providers
- Customers
- Vendors
- Business partners
- Personal data processing activities
- All products and services provided by Qyrus

3. Objectives

The objectives of this policy are to:

- Provide a consistent dispute management process.
- Resolve disputes promptly and fairly.
- Protect customer trust.
- Minimize business disruption.
- Maintain regulatory compliance.
- Improve products and internal processes.
- Ensure disputes are documented and auditable.



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4. Types of Disputes

This policy covers disputes including, but not limited to:

Customer Disputes

- Service quality
- Billing issues
- SLA violations
- Feature disagreements
- Access issues

Privacy Disputes

- Consent withdrawal
- Data deletion requests
- Data correction requests
- Unauthorized processing
- Privacy complaints

Information Security Disputes

- Security incidents
- Access control
- Account ownership
- Authentication issues

Vendor Disputes

- Contract disagreements
- Delivery failures
- Security obligations
- Confidentiality issues

Internal Disputes

- Policy interpretation
- Security responsibilities
- Access requests
- Compliance concerns



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5. Policy Statements

Qyrus shall:

- Record every dispute in the Dispute Register.
- Acknowledge disputes within one business day.
- Assign an owner for every dispute.
- Investigate disputes objectively.
- Maintain confidentiality throughout the process.
- Resolve disputes within defined SLAs where reasonably practicable.
- Escalate unresolved disputes appropriately.
- Preserve all evidence.
- Maintain complete audit trails.
- Identify opportunities for continual improvement.

6. Roles and Responsibilities

Role	Responsibilities
Head of Information Security	Overall governance and oversight
Privacy Officer	Privacy-related disputes
Legal Team	Legal interpretation and contractual disputes
Customer Success	Customer communication
IT Team	Technical investigations
HR	Employee disputes
Management	Escalation and final approval
Internal Audit	Periodic review of dispute handling effectiveness



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7. Dispute Resolution Procedure

Step 1 – Dispute Submission

Disputes may be received through:

- Email
- Support Portal
- Customer Success
- Phone
- Vendor Portal
- Compliance mailbox
- Privacy mailbox
- Internal reporting channels

Required information:

- Name
- Contact details
- Description
- Supporting evidence
- Date
- Desired outcome

Step 2 – Registration

The dispute shall be recorded in the Dispute Register, including:

- Unique ID
- Date received
- Category
- Severity
- Assigned owner
- Current status

Step 3 – Acknowledgement

Acknowledgement shall normally be sent within **one business day**, including:



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- Dispute reference number
- Assigned contact
- Expected response timelines
- Next steps

Step 4 – Investigation

The assigned owner shall:

- Review evidence.
- Interview relevant personnel where necessary.
- Examine system logs.
- Review contracts or policies.
- Assess legal and regulatory obligations.
- Identify the root cause.

All findings shall be documented.

Step 5 – Risk Assessment

Each dispute shall be evaluated based on:

- Business impact
- Security impact
- Privacy impact
- Regulatory implications
- Customer impact
- Financial exposure
- Reputational risk

Severity levels:

- Critical
- High
- Medium
- Low

Step 6 – Resolution

Possible resolutions include:



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- Technical remediation
- Service restoration
- Data correction
- Data deletion
- Refunds or credits (where contractually applicable)
- Contract clarification
- Process improvement
- Employee retraining
- Policy updates

Step 7 – Escalation

Disputes shall be escalated if:

- SLA is likely to be exceeded.
- Regulatory reporting is required.
- Executive approval is needed.
- Litigation is threatened or initiated.
- A major security incident is involved.

Escalation path:

1. Team Lead
2. Department Head
3. Head – Information Security
4. Legal Counsel
5. Executive Management
6. Chief Executive Officer

Step 8 – Closure

Before closure:

- Resolution implemented.
- Customer notified.
- Evidence retained.
- Corrective actions completed.



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- Preventive actions documented.
- Management approval obtained where required.

The dispute status shall be updated to **Closed**.

8. Service Level Targets

Activity	Target
Acknowledgement	Within 1 business day
Initial Assessment	Within 2 business days
Investigation	Within 5 business days
Resolution (Standard)	Within 10 business days
Critical Disputes	As soon as practicable, with continuous management oversight

Complex disputes may require additional time depending on technical, legal, or third-party dependencies. Stakeholders should be kept informed of material delays.

9. Documentation Requirements

The following records shall be retained:

- Dispute Register
- Complaint records
- Investigation notes
- Email correspondence
- Meeting minutes
- Root Cause Analysis
- Corrective Action Plans
- Preventive Action Plans
- Supporting evidence
- Closure approvals

10. Confidentiality

All dispute information shall be:

- Treated as confidential.



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- Shared only with authorized personnel.
- Stored securely.
- Protected from unauthorized disclosure.
- Retained according to the organization's records retention requirements.

11. Metrics

The organization shall monitor:

- Number of disputes
- Resolution time
- SLA compliance
- Repeat disputes
- Customer satisfaction
- Privacy disputes
- Security disputes
- Escalation rate
- Open vs. closed disputes
- Root cause trends

Management shall review these metrics periodically.

12. Exceptions

Any exception to this policy shall:

- Be documented.
- Include justification.
- Be approved by the Head – Information Security or delegated authority.
- Be reviewed periodically until resolved.

13. Compliance

Failure to comply with this policy may result in disciplinary action, contractual remedies, or other actions consistent with applicable laws, contracts, and organizational policies.

14. Related Documents

- Information Security Policy



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- Privacy Policy
- Incident Response Policy
- Risk Management Policy
- Vendor Management Policy

15. Control Mapping

Framework	Control Reference
SOC 2	CC2.2, CC2.3, CC3.2, CC4.1, CC5.2, CC7.2, CC7.3, CC9.2, P7.1, P8.1
ISO/IEC 27001:2022	Clauses 5, 6, 7, 9, 10; Annex A controls for incident management, supplier relationships, and continual improvement
GDPR	Articles 5, 12, 15–22, 24, 32, 33, 77–79
DPDP Act (India)	Provisions relating to grievance redressal, data principal rights, and accountability

16. Review & Maintenance

This document shall be reviewed annually or reviewed after major organizational or technological changes or updated for new regulatory or AI governance obligations.