

Monitoring and Compliance of PSP's Merchants' Content

1. Purpose

The purpose of this policy is to establish guidelines and procedures for monitoring and ensuring compliance with content standards set by the Payment Service Provider (PSP) for its merchants. This policy aims to maintain the integrity, legality, and appropriateness of content displayed by merchants using the PSP's services.

2. Scope

This policy applies to all merchants and their associated content utilizing the services of the PSP. It outlines the process of monitoring, assessing, and enforcing compliance with content guidelines.

3. Content Guidelines

The PSP's content guidelines encompass the following principles:

Legal Compliance: All content must adhere to relevant laws and regulations in the respective jurisdiction.

Prohibited Content: Content promoting illegal activities, hate speech, discrimination, violence, or explicit adult material is strictly prohibited.

Intellectual Property: Merchants must have the right to use and display any copyrighted or trademarked material.

Accuracy: All content must be accurate, truthful, and not misleading.

Privacy: Merchants must respect user privacy and data protection regulations.

Branding: Merchants' content should not misrepresent the PSP's brand or services.

**** Merchants are required to sign the above-mentioned policy as part of the onboarding agreement. ****

4. Monitoring Process

4.1 Automated Monitoring

The PSP shall deploy automated tools to scan merchant content for potential violations of the content guidelines. These tools will use algorithms to identify keywords, images, and patterns associated with prohibited content. Automated monitoring shall be conducted on a regular basis.

4.2 Manual Review

In addition to automated monitoring, the PSP will conduct manual reviews of randomly selected merchant accounts. Trained personnel will review content for compliance with the content guidelines. Manual reviews will provide a deeper assessment and ensure that automated tools are accurately identifying violations.

5. Compliance Procedures

5.1 Notification of Violations

When a violation is identified, the PSP will promptly notify the merchant regarding the nature of the violation and request corrective action. The notification will include a reasonable timeframe for the merchant to address the issue.

5.2 Corrective Action

Merchants are required to take immediate corrective action upon receiving a violation notice. This may involve removing or modifying content to align with the content guidelines. Merchants must acknowledge their commitment to compliance and the steps taken to rectify the violation.

5.3 Escalation

If a merchant fails to address a violation within the specified timeframe, the PSP will escalate the matter. Escalation may involve temporary suspension or termination of the merchant's account, depending on the severity and persistence of the violation.

5.4 Appeals Process

The PSP will provide a mechanism for merchants to appeal violation decisions. Appeals must be submitted within a reasonable timeframe after the violation notice. Appeals will be reviewed by a separate team within the PSP to ensure impartiality.

6. Reporting and Recordkeeping

The PSP will maintain records of all monitoring activities, violation notices, corrective actions, and appeals. These records will be kept for a defined period in compliance with data retention regulations.

7. Employee Training

Employees involved in the monitoring and compliance process will receive comprehensive training on content guidelines, the monitoring process, and handling merchant interactions.

8. Review and Update

This policy and its procedures will be reviewed periodically to ensure relevance and effectiveness. Updates will be made as necessary to accommodate changes in regulations, technologies, and industry standards.