



Dear Business Partner,

This is with reference to the latest RBI circular DPSS.POLC.No.S-516/02-14-003/2021-22 on “Tokenisation – Card Transactions: Permitting Card-on-File Tokenisation (CoFT) Services”, extending the device-based tokenisation framework referred in RBI’s circulars DPSS.CO.PD.No.1463/02.14.003/2018-19 dated January 8, 2019 on “Tokenization – Card transactions” and CO.DPSS.POLC.No.S-469/02-14-003/2021-22 dated August 25, 2021 on “Tokenization – Card Transactions : Extending the Scope of Permitted Devices” to CoF Tokenisation (CoFT) as well.

Additionally, reference is invited to the RBI circulars DPSS.CO.PD.No.1810/02.14.008/2019-20 dated March 17, 2020 (as updated from time to time) and CO.DPSS.POLC.No.S33/02-14-008/2020-2021 dated March 31, 2021 on “Guidelines on Regulation of Payment Aggregators and Payment Gateways”, advising that neither the authorized Payment Aggregators (PAs) nor the merchants on-boarded by them shall store customer card credentials [also known as Card-on-File (CoF)].

Since the networks are required to ensure compliance with RBI’s circular mentioned in para 2 under which no entity in the card transaction / payment chain, other than the card issuers and / or card networks, shall store the actual card data for transaction and any such data stored previously shall be purged as per the RBI directive.

Further RBI vide its circular dated June 24, 2022 has extended the timeline for storing of CoF data by three months, i.e., till September 30, 2022, after which such data shall be purged. We therefore request you to kindly note the extended timelines and confirm the readiness of compliance as per RBI mandates by return email.

At American Express, regulatory compliance is of the utmost importance and we would seek your support to ensure that you take steps to ensure compliance with the regulatory guidelines.

Authorised Signatory
For American Express Banking Corp.