



Control Lapses

- Decentralized operations for critical checks and balances;
- Pressure to activate mobile banking app;
- Opportunity to commit fraud with collusion;
- Customers KYC and information compromised with the third parties;
- Audit trail on the number of times mobile application installed;
- Access to customer information and misuse;
- Reasonableness checks on account of not having a mobile app and sudden request for mobile and internet banking;
- Target achieved of mobile bank application activation without actual basis;
- Segregation of critical functions at decentralized branch levels to be revisited;
- Access and activation of mobile app should be revisited to avoid account takeover and identity theft;
- Use of an alternate number of OTP should be revisited if the option is allowed.