
Player Complaints Policy

Gravity Unleashed BV

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2. Contents

1.	Version Control	2
2.	Contents	3
3.	Definitions and Interpretation	4
4.	What This Complaints Handling Procedure Covers	4
5.	Receipt and Recording of Complaints	5
6.	Time limits and escalation of complaints overview	6
7.	Complaint Information	6
8.	Complaints Handling	7
9.	External Resolution	8
10.	Confidentiality and Data Protection	8
11.	Record Keeping	9
12.	Overall Process and Escalation	10

3. Definitions and Interpretation

In this Complaints Handling Procedure, the following expressions have the following meanings:

"ADR"	Alternative Dispute Resolution;
"Business Day"	means, any day (other than Saturday or Sunday) on which ordinary banks are open for their full range of normal business
"Complaint"	means a complaint about the Company's services, customer service and employees;
"Complaints Policy"	means the Company's settlement of complaints policy, available within the company's Terms and Conditions;
"Complaint Reference"	means a unique number assigned to a Complaint that will be used to track that Complaint;
"Customer"	means a player of the Company's and includes potential players who are yet to deposit on the site;
"Disputes"	those complaints that are about the customer's gambling transaction (including management of the transaction) and have not been resolved at the first stage of the operator's complaints procedure. For example, disputes may include those linked to the application of bonus offers or to other terms and conditions, account management, or the ability to access funds and winnings.
"External Resolution"	means the referral of a Complaint to the ADR for resolution by a Customer if that Customer is not satisfied with the outcome of this Complaints Handling Procedure;
"Recommendation"	Means the recommended resolution to a Complaint made by the staff member handling a Complaint.

4. What This Player Complaints Policy Covers

This Policy has been prepared in accordance with Article 5.3 of the LOK, further rules, policies and guidelines regarding complaints and ADR processes and applies to complaints pertaining to the provision of services by Gravity Unleashed BV (the **"Company"**) or to the Company's customer service and employees;

For the purposes of this Policy, any reference to the Company also includes Gravity Unleashed BV's employees.

Complaints may relate to any of the Company's activities and or services and may include (but not be limited to):

1. The quality of customer service.
2. The behaviour and/or professional competence of the employees;
3. Delays, defects, system errors or any other problems associated with the provision of services;

The following do not constitute a complaint:

1. Customers raising such questions or matters should be raised through a ticket;
2. General questions about services;
3. General questions relating to offers and promotions;
4. Formal requests for the disclosure of information including, but not limited to, those made under the Data Protection Act 2018.

The company's players may raise complaints for at least six months from the date of the incident; however, it is encouraged that complaints be made as soon as possible to maintain effective resolutions in a timely, fair, open, and transparent manner.

5. Receipt and Recording of Complaints

Customers may make Complaints using any of the following methods:

1. By email, addressed to the Compliance team of the Company at complaints@thrill.com
2. By live chat, located on the company's website within the customer support page; and
3. By contacting customer support email at support@thrill.com

Complaints made through any social media channel (e.g., Facebook, Twitter, LinkedIn, and Instagram) are not regarded as formal complaints. For example, a Facebook comment on a promotional offer post or a direct message via Twitter. The company's social media platforms are not regularly monitored for complaints; however, when a complaint is identified, it will be responded to promptly, and the player will be advised of the correct process to submit a formal complaint.

Upon receipt of a complaint, the following steps shall be taken as soon as reasonably practicable.

1. If a written complaint is received by the customer support email, the CS managers will forward it to complaints@thrill.com, so the relevant department can take action.
2. If a complaint is received via live chat, all staff are adequately trained to recognise where complaints raised in this manner should be directed to the formal process, which involves a member of the Customer Support team gathering the information and passing it on to Support Managers.

6. Time limits and escalation of complaints overview

The Company allows customers to raise complaints for at least six months from the date of the incident. The Company encourages customers to make complaints as soon as possible, but this is not included in the terms to avoid preventing consumers from raising complaints at any point during that six-month period.

The Company's complaints register is monitored by the Compliance Department on a monthly basis. All Complaints shall be given a Complaint identification number, and the investigation thereof shall begin within five (5) Business days.

Responsible Gaming complaints are acknowledged in writing within 48 hours of receipt, and the overall resolution will take no longer than two weeks, extendable by an additional two weeks only if the player's delay occurs.

Other complaints are acknowledged in writing within one week of receipt, and the overall resolution of the complaint will take no longer than four weeks, extendable to eight weeks in total.

Once a final decision has been made, a notification will be sent to the Complainant's registered e-mail address. Only once the Company's full complaints handling procedure has been followed and completed can the Complainant seek external resolution from an ADR.

The Company will notify to the customer with a final letter to explain:

- the final decision
- that this is the end of the operator's complaints process
- how to escalate their complaint to an independent Alternative Dispute Resolution (ADR) entity if they wish to do so.

7. Complaint Information

The Company expects the following information to be provided in as much detail as is reasonably possible when making a complaint:

1. The Customer's name, address, telephone number and email address
2. Further details of the Complaint, including, as appropriate, all times, dates, events, and people involved;
3. Details of any documents or other evidence on which the Customer wishes to rely in support of the Complaint;
4. Details of how the Customer would like the Company to resolve the Complaint. Whilst the Company will make all reasonable efforts to accommodate such requests, the Company are not bound to take any action beyond that which the Company may be contractually or otherwise legally obliged to take.

Covered Complaint Categories under this Policy are:

- Deposit/Withdrawal Issues
- Bonuses
- Account restrictions
- Game fairness
- Responsible Gaming
- Balances
- KYC/AML
- Data Protection
- Fraud, Software Issues
- Licensing & regulation violations
- Treatment of minors
- Unfair T&Cs

8. Complaints Handling

Upon receipt of a Complaint, the Complaint shall be considered, and a decision made within fourteen (14) Business Days, whether to:

1. Investigate the Complaint fully if it is considered to be valid, in which case the procedure should resume; or
2. Dismiss the Complaint if it is considered to be invalid, in which case the Customer shall be informed of the decision in writing within fourteen (14) Business Days.
3. Subject to delays arising from circumstances beyond the Company's reasonable control or beyond the reasonable control of the staff member handling the Complaint (including, but not limited to, delays in other persons responding to communications), Complaints shall be fully investigated, decided upon and a Recommendation made within fourteen (14) Business Days.

If the Complaint concerns (a) specific employee(s), (a "Complaine" or "Complainees"), the Complaine(s) in question must be informed of the Complaint, and a meeting should be scheduled as necessary to discuss it. In such instances, the Complaine(s) must not, under any circumstances, contact the Customer directly about the Complaint. If the Customer contacts the Complaine(s) directly regarding the Complaint (which they are asked not to do in our Complaints Policy), the Complaine(s) should politely refuse to discuss the issue. Any such contact must be reported to the Company.

If additional information or evidence is needed to support the Complaint, the Customer will be contacted via their registered email address, clearly stating what is required. Customers should be

kindly reminded that any delay in responding to such requests may slow down the resolution of their Complaint.

If a Customer is unable or unwilling to provide information or evidence requested under Section 5.5, reasonable endeavours shall still be made to resolve the Complaint. However, if it is not possible to uphold the Complaint without the requested information or evidence, the Complaint may be closed, and the Customer will be informed of the outcome.

The Complaint shall be examined and assessed, considering all relevant statements, information, evidence, and circumstances. Full objectivity and fairness must be maintained at all times.

Subject to exceptions such as the presence of suspicious activity, during the investigation of the Complaint, all necessary records, information, and employees shall be made available to ensure an impartial and comprehensive investigation.

Access to the following records and/or information is restricted and shall require the authorisation of the Compliance Officer ("CO"), Paloma González Mascaraque (paloma.g.mascaraque@paradym.io).

9. External Resolution

All Customers have the right to seek External Resolution of Disputes through an external ADR. XXXX will act as the ADR for the Company concerning all players, not in its capacity as a regulator. To contact the ADR, customers can register an account with XXX, and doing so is free of charge.

The nominated ADR will serve as an ADR for operators holding a licence with the CGA regarding a gambling transaction governed by the laws of Curacao. XXX may also, at its absolute discretion, handle Disputes arising in or subject to the laws of other jurisdictions. Players will need to contact the Company and may need access to documents and information related to a Complaint if a Customer refers their Complaint for External Resolution. All interactions between the ADR and the Company will be managed through Regulatory Compliance, which will oversee the process. Any requests made by the ADR for evidence or information, whether written or oral, will be treated as a priority and answered within ten (10) business days, subject to approval and authorisation by Regulatory Compliance to ensure the request is reasonable and relevant to the Complaint.

10. Confidentiality and Data Protection

All Complaints, Appeals, evidence, and other information collected, held, and processed under this Complaints Handling Procedure shall be treated with the highest confidentiality at all times. Such information may only be shared with Company employees to the extent necessary to resolve the Complaint in accordance with this Procedure.

In cases where Complaint details are used for training or quality improvement, they may be shared with other Company employees beyond this Procedure's scope only after obtaining the Customer's clear permission through their preferred contact method. Personal details (i.e., any information that could identify the Customer) shall be removed from all information used for this purpose.

11. Record Keeping

All complaints will be retained on record for at least five years, after which general information about the complaint can be found on the Complaints Register.

The following items are recorded within the complaints register: -

- Date of receipt of the complaint
- Player ID
- Player full name
- Player e-mail address
- Logged by
- Subject and content of the complaint
- Amount in dispute - Complaint Reference
- The complaint is valid (Yes/No)
- Resolution
- The outcome of the Complaint handling

12. Overall Process and Escalation

There are no exceptions to this Policy. Any exceptions must be assessed on a case-by-case basis and can only be approved by the Compliance Officer.

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