

Player Complaints Policy

1. Policy Overview

This Complaints Policy outlines the framework for handling player complaints and disputes in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK). It ensures that players have access to a fair, transparent, and efficient complaint resolution process, including access to free and independent Alternative Dispute Resolution (ADR) services.

Key Commitments by Winna B.V.:

- Compliance with this policy is mandatory under the LOK and subject to supervision by the Curaçao Gaming Authority (CGA).
- The full complaints procedure is included or clearly referenced in the Terms and Conditions, outlining each stage of the resolution process.
- The Complaints Policy is also published as a standalone document, accessible via the homepage or registration page.
- Players may be required to confirm acceptance of the Complaints Policy during registration or through other mechanisms such as checkboxes, pop-ups, or email confirmations.
- This policy is regulatory in nature and does not override private or civil law, including Book 6 of the Curaçao Civil Code. Winna B.V. remains fully responsible for ensuring all terms, procedures, and practices also comply with relevant civil law. Independent legal advice is strongly recommended where necessary.

This policy provides the required structure for Winna B.V. to remain fully compliant with current CGA regulations while upholding high standards of fairness, transparency, and player protection in the handling of complaints.

2. Definitions

Player interaction is any written communication initiated by a player and directed to the operator's customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

Complaint is a written expression of dissatisfaction by a player relating to the operator's services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution. For the purpose of reporting requirements, a complaint is when a Complaint Submission Form has been submitted by the player to the operator/and or a complaint has been escalated to ADR

Dispute a complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated, either within the organization or to an independent third party (e.g. an ADR provider or court of law).

3. Compliant submission process

Complaint window

As part of our compliance with the LOK and NOOGH regulatory frameworks, we at Winna B.V. ensure players have a clear and accessible process for lodging complaints.

Key elements of our complaint submission process:

- This Complaints Policy applies from the date our licence is issued under the LOK, or from the issuance of a green or orange dynamic seal under the NOOGH regime.
- Players may submit complaints free of charge within six (6) months from the date of:
 - Bet settlement, or
 - The specific incident giving rise to the complaint.
- For peer-to-peer games (e.g., poker) and ante-post fixed odds bets, the six-month period begins after the conclusion or settlement of the event—not at the time the wager was placed.
- For in-running (live) sports betting, players are also entitled to submit complaints within six months. However, we inform players that due to the dynamic nature of in-running data, timely complaint submission is advised, as certain data may no longer be available after a short period. We are not expected to preserve such data indefinitely.

This approach reflects our commitment to transparency, player protection, and full compliance with CGA requirements.

Stages/Escalation of Complaint Resolution

At Winna B.V., we follow a structured, fair, and transparent process for resolving player complaints, in compliance with the requirements of Article 1.3 and Article 5.3 of the LOK.

Key aspects of our complaint escalation process include:

1. **Who Can Submit a Complaint**
Only the registered player may lodge a complaint. In line with Article 1.3(c) of the LOK, players are prohibited from transferring, selling, or assigning their claims against a licensed operator to third parties.
2. **Initial Support Channels**
We provide direct customer support via email and/or live chat as the first point of contact for any player concerns or complaints.
3. **Official Complaint Submission Form**
An official Complaint Submission Form is available to players in at least two formats:
 - A downloadable form that can be completed and submitted via email or upload; and/or
 - An online form that can be completed and submitted directly through our platform.

The form includes (at a minimum):

- Player's name, address, and place of residence
- Player's account number (if applicable)
- Date of complaint and date of the incident in question
- Description of the issue, with optional pre-defined categories for clarity

The form is made available in English and the language of the website/domain used by the player.

We may also request supporting documentation as needed, but only when it is reasonable and relevant to resolving the complaint.

4. **Alternative Dispute Resolution (ADR)**
We offer players access to ADR services, ensuring an independent and impartial review process when necessary.
5. **Right to Legal Action**

Except where mutually agreed under ADR terms, we do not restrict a player's right to pursue legal action through the appropriate legal channels.

This structured escalation process reflects our commitment to regulatory compliance and high standards of player protection and dispute handling.

Role of the CGA

At Winna B.V., we ensure that all players are clearly informed about the role of the Curaçao Gaming Authority (CGA) in relation to complaints and dispute resolution, as part of our Terms and Conditions.

Key points regarding the CGA's involvement:

1. **Transparency in Terms**
We make it explicitly clear in our Terms and Conditions that the CGA does not act as a dispute resolution body for player complaints relating to gambling transactions on our platform.
2. **No Involvement in Decision-Making**
The CGA does not review, intervene in, or overturn complaint decisions made by either Winna B.V. or an appointed Alternative Dispute Resolution (ADR) provider, unless the handling of the complaint is deemed inadequate by regulatory standards.
3. **Player's Right to Contact CGA**
While the CGA does not resolve individual disputes, we do not restrict any player from contacting the CGA directly regarding:
 - Suspected malpractice
 - Breaches of license conditions
 - Whistleblowing or regulatory concerns
4. **Regulatory Oversight**
The CGA uses information provided in player complaints to inform its supervisory and enforcement responsibilities, even though it does not mediate between the parties directly.

This approach supports regulatory transparency while ensuring players understand the proper channels and limitations of complaint escalation under the LOK framework.

4. Complaint Resolution Process

Timeline: Responsible Gaming Complaints

At Winna B.V., we recognize the importance of promptly addressing complaints related to responsible gaming, especially where player well-being may be affected.

Priority Handling

Responsible gaming complaints are prioritized and include issues such as:

- Alleged targeting of vulnerable players
- Delays or failures in self-exclusion or cooling-off measures
- Any breach of mandated consequences outlined in our Responsible Gaming Policy

Our Process and Timelines

- We aim to resolve responsible gaming complaints within five (5) business days wherever possible.
- Within two (2) days of receiving a complaint, we will:
 - Acknowledge receipt of the complaint in writing

- Explain how the complaint will be handled
- Inform the player of the typical resolution timeline

Extensions and Communication

- If additional time is required to reach a fair and informed outcome, the player will be notified of the delay, which must not exceed two weeks.
- If delays are caused by player non-response or incomplete information, the resolution period may be extended by no more than an additional two weeks.

This timeline demonstrates our ongoing commitment to player protection, regulatory compliance, and responsible gambling standards.

Timeline: All Other Complaints Type

At Winna B.V., we are committed to providing timely and transparent responses to all player complaints, in accordance with regulatory expectations.

Standard Resolution Timeframe

- We will assess and respond to all general complaints within four (4) weeks of receipt.
- In cases where the complaint is particularly complex or where additional information is required, we may extend this period once by up to four (4) additional weeks.
 - Any such extension will be communicated in advance and in writing to the player, with reasons for the delay.

Initial Response (Within One Week)

Within one (1) week of receiving a complaint, we will:

- Acknowledge receipt of the complaint in writing
- Explain the complaint process and what the player can expect
- Provide an estimated timeline for resolution, based on the type of complaint

This structured approach helps ensure that all complaints are addressed fairly, efficiently, and in line with regulatory requirements, while keeping players fully informed throughout the process.

Response and Resolution

At Winna B.V., we ensure that every player receives a final written response to their complaint, in full compliance with regulatory requirements.

Our final response will take one of the following forms:

1. Reasoned Resolution
A clearly reasoned final decision, including supporting evidence if necessary or applicable, explaining the outcome of the complaint.
2. Rejection with Justification
If the complaint cannot be handled:
 - We will provide detailed reasons for not processing the complaint.
 - If further information is reasonably needed to resolve the complaint, we will request it within the initial four-week period.
 - If the player fails to provide the requested information within this timeframe, we may formally reject the complaint.
3. Right to Escalate

If the player is not satisfied with our final decision and submits a further complaint on the matter, we will inform them of their right to escalate the case to an independent ADR (Alternative Dispute Resolution) entity.

This process ensures that all complaints are closed transparently, with clear communication and respect for the player's right to further action.

Artificial Intelligence (AI)

The use of AI is permissible under this Complaints Policy Guideline subject to the following terms:

1. Once a player complaint has been identified as pertaining to Responsible Gaming, communications with the player should be conducted by a human, not AI.
2. Complaints that can be reasonably considered as complex should be dealt with by a human, not AI.
3. The AI records must be monitored to ensure that they are reasonable in their solutions/recommendations and consistent across players with like-for-like complaints.

5. Alternative Dispute Resolution

To remain fully compliant with our licensing obligations under the National Ordinance on Games of Chance (LOK), we at Winna B.V. are committed to offering players access to independent, certified ADR (Alternative Dispute Resolution) services, in accordance with the CGA's ADR Policy.

Our Commitments to ADR:

1. **Transparency in Terms & Conditions**
Full details of our ADR process are clearly stated in our Terms and Conditions, ensuring all players are informed of their right to escalate unresolved complaints.
2. **Certified ADR Provider Agreement**
Within one month of the CGA publishing the official list of certified ADR providers, we upload an executed agreement with at least one CGA-certified ADR entity to the CGA Portal.
3. **Free Access for Players**
If a complaint cannot be resolved internally, the player is entitled to escalate the matter to an independent ADR provider at no cost to them.
 - Winna B.V. bears all costs associated with the ADR process.
4. **Finality of ADR**
Once an ADR process has been completed:
 - Neither the player nor the operator may initiate the same dispute with another ADR provider.
 - If a player abandons the ADR process after it has started, the dispute may not be re-opened in the future.
5. **Reasonable ADR Parameters**
We may define ADR parameters to prevent misuse of the system (e.g., minimum claim value, requirement to complete ADR before legal action, or whether the ADR decision is binding).
 - However, we carefully assess any such conditions and seek independent legal advice to ensure compliance with civil law.
 - The CGA will evaluate the reasonableness of these measures on a case-by-case basis. For example:
 - Low-value claims may justifiably be filtered for potential abuse.

- However, non-monetary complaints (e.g. self-exclusion breaches) must still be taken seriously, regardless of claim value.

This ADR framework ensures that player disputes are handled fairly, independently, and in a manner consistent with both regulatory expectations and consumer protection principles.

6. Record Keeping and Reporting

At Winna B.V., we maintain robust record-keeping and reporting procedures to ensure full compliance with the LOK and oversight by the Curaçao Gaming Authority (CGA).

1. Regular Reporting to the CGA

We are required to submit complaint reports to the CGA twice per year, on:

- January 15th
- June 15th

The first report is due January 2026, and must include complaints submitted by players via the official Complaints Submission Form during the relevant period.

Each report will include:

- Total number of complaints received
- Number of settled complaints (both upheld and rejected)
- Number of pending or unresolved complaints
- Complaints categorized by type
- Number of complaints referred to ADR
- Number and details of complaints where legal action was initiated by a player

2. Ongoing Compliance

- We ensure full transparency in handling complaints, adherence to ADR decisions, and responsiveness to regulatory changes.
- Certified ADR providers we work with will independently follow the ADR reporting obligations as outlined by the CGA.

3. Retention of Complaint Records

- Records of unresolved, ADR-processed, or legally escalated complaints are retained for up to five (5) years, or less if dictated by:
 - Data protection laws
 - Statute of limitations
 - Other relevant legal guidelines

4. CGA Audit Rights

- The CGA may request access to our complaint records and pending dispute files at any time, and we are prepared to fully cooperate with such reviews.

This framework ensures accountability, enables regulatory supervision, and demonstrates our ongoing commitment to protecting player rights and maintaining transparency.

7. Terms and Conditions

At Winna B.V., we ensure that our Complaints Procedure is fully transparent, easily accessible, and compliant with all regulatory requirements under the LOK.

Website & Terms and Conditions

- Our Complaints Procedure is published as a standalone link or document on our website.
- It is also clearly outlined within our Terms and Conditions to ensure all players are aware of their rights and the steps involved in raising a complaint.

Minimum Required Information Provided

We include the following key details to guide players through the complaints process:

1. Customer Support Access
 - Clear links and instructions on how players can contact our customer service team.
2. How to Submit a Complaint
 - A description of the required information needed to submit a complaint.
 - Direct access to the online submission form and/or a downloadable PDF/Word version of the Complaint Submission Form.
3. Timelines
 - Clear explanation of response and resolution timelines, including timeframes for general and responsible gaming-related complaints.
4. Player Rights to Escalate
 - Explicit mention of a player's right to:
 - Escalate a complaint to an independent ADR provider
 - Raise regulatory concerns directly with the Curaçao Gaming Authority (CGA)
5. Impact of ADR Decisions
 - Information about the potential consequences of ADR outcomes, including how they may affect a player's right to pursue further legal or judicial recourse.
6. ADR Process Overview
 - A summary of the ADR procedure, including the player's rights and what to expect during the process.
7. ADR Contact Details
 - Contact information for our designated ADR provider(s).
8. Role of the CGA
 - A clear statement that the CGA does not mediate individual disputes, but players may contact the CGA directly if they believe Winna B.V. is in breach of regulatory obligations.

This level of transparency ensures players understand their rights, know how to navigate the complaints process, and can trust that their concerns will be handled fairly and in compliance with all applicable regulations.

8. Reasons for Complaint

At Winna B.V., we respect every player's right to submit a complaint concerning any aspect of their experience with us or their participation in games of chance. Players may raise concerns about, but are not

limited to, the following areas:

1. Deposit processing issues
2. Withdrawal delays or rejections
3. Disputes over bonus terms and conditions
4. Account closures or imposed restrictions
5. Alleged errors or perceived unfairness in game outcomes
6. Responsible gaming concerns
7. Management and treatment of player balances
8. Know Your Customer (KYC) and identity verification processes
9. Data protection and privacy matters
10. Technical or software malfunctions
11. Anti-Money Laundering (AML) issues
12. Matters involving minors or underage players
13. Allegations of fraudulent games
14. Claims of fraudulent or deceptive practices
15. Questions regarding our license or regulatory compliance
16. Concerns about unfair terms and conditions

We encourage players to raise any issues promptly so we can address them efficiently, transparently, and in full compliance with regulatory standards.

9. Transition Deadline

We understand that this Complaints Policy must be uploaded to the CGA Portal no later than 31st July 2025.