

Player Complaints Policy

Hongda Information Technology B.V.
Version 1.0 – March 2026

1. Policy Overview

This Player Complaints Policy outlines the procedures and framework established by **Hongda Information Technology B.V.** (“Hongda” or “the Operator”) for managing and resolving player complaints and disputes. The policy ensures a transparent, fair, and efficient process in alignment with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen – “LOK”) and the regulatory requirements of the Curaçao Gaming Authority (CGA).

Hongda is committed to upholding player rights and maintaining the highest standards of fairness and integrity. This policy guarantees players access to a clear, free, and effective complaint and dispute resolution process, including independent Alternative Dispute Resolution (ADR) services that prioritize impartiality and quality.

Adherence to this Complaints Policy is mandatory under the LOK, and failure to comply may result in regulatory action by the CGA.

This policy forms part of Hongda's Terms and Conditions and is also made available as a standalone document through the company's official website.

2. Definitions

2.1 Player Interaction

Any written communication initiated by a player and directed to Hongda's customer service team, including enquiries, feedback, or requests for assistance.

2.2 Complaint

A written expression of dissatisfaction by a player regarding Hongda's services, decisions, or conduct. A complaint becomes official when the Complaint Submission Form has been completed and submitted by the player, or when the matter has been escalated to ADR.

2.3 Dispute

A complaint that remains unresolved to the player's satisfaction after Hongda's internal process has been completed and has been escalated to an independent third party, such as an ADR provider or court of law.

3. Complaint Submission Process

3.1 Complaint Window

1. This policy applies to all players of Hongda Information Technology B.V. licensed under the LOK.
2. Players may file a complaint free of charge within six months of the event or bet settlement giving rise to the complaint.
3. For peer-to-peer (P2P) games or ante post fixed odds betting, the six-month period begins after settlement or conclusion of the event.
4. For in-running betting, players should act promptly, as certain data may not be retained beyond a short period.

3.2 Stages of Complaint Resolution

1. Only the registered player may submit a complaint. Claims or disputes cannot be transferred, assigned, or pledged.
2. Players should first contact Hongda's Customer Support via live chat or email.
3. If the issue is not resolved, the player must complete the Complaint Submission Form, available online or for download.
 - The form includes:
 - Player's full name, address, and residence.
 - Account number (if applicable).
 - Date of complaint and disputed event.
 - Description of the issue (selected category).
 - The form is available in English and in the language of the player's website interface.

4. Hongda may request supporting documents where reasonably necessary to resolve the issue.
5. Hongda provides access to independent ADR services (see Clause 5).
6. Hongda does not restrict a player's right to pursue legal action.

3.3 Role of the CGA

1. Hongda clearly communicates the role of the CGA within its Terms and Conditions.
2. The CGA does not intervene in individual player disputes.
3. Decisions made by Hongda and/or an ADR provider are not subject to review by the CGA unless found to be mishandled.
4. Players may contact the CGA regarding regulatory breaches or malpractice, but not for dispute mediation.
5. The CGA uses complaint data for oversight and enforcement purposes.

4. Complaint Resolution Process

4.1 Responsible Gaming Complaints

Complaints concerning Responsible Gaming are prioritized due to potential impacts on player welfare. Such cases include issues involving Vulnerable Players, self-exclusion, or cooling-off periods.

Hongda aims to resolve Responsible Gaming complaints within five business days.

Within two business days of receiving such a complaint, Hongda will:

- Confirm receipt in writing.
- Explain how the complaint will be handled.
- Provide an estimated resolution timeframe.

If additional time is needed, the player will be informed of the delay, which cannot exceed two weeks, unless caused by the player's own delayed response.

4.2 Other Complaint Types

Hongda will address and respond to other complaints within four weeks. If additional time is necessary, this may be extended once by a further four weeks with prior notice.

Within one week of receiving a complaint, Hongda will:

- Confirm receipt in writing.
- Explain the process and provide an estimated resolution timeline.

4.3 Response and Resolution

Every complaint receives a written final determination:

1. A reasoned final decision with supporting evidence, or
2. An explanation for non-acceptance of the complaint, or
3. An invitation to escalate to ADR if the player remains dissatisfied.

4.4 Artificial Intelligence (AI)

Hongda may use AI tools to assist in handling complaints, provided:

1. Responsible Gaming cases are handled by human staff.
2. Complex complaints are handled by humans, not AI.
3. AI-assisted records are regularly reviewed for consistency and fairness.

5. Alternative Dispute Resolution (ADR)

1. Hongda maintains an active agreement with at least one CGA-certified ADR provider.
2. If a complaint cannot be resolved internally, the player may escalate it to an independent ADR provider, free of charge.
3. Hongda bears all costs related to ADR procedures.
4. Once ADR is concluded, it cannot be reopened or referred to another provider.
5. If a player abandons the ADR process, the dispute cannot be refiled.
6. Hongda ensures ADR procedures comply with the CGA's official ADR Policy.

6. Record-Keeping and Reporting

Hongda will:

1. Submit complaint reports to the CGA twice yearly — by January 15th and June 15th, starting January 2026.
2. Reports will include:
 - Total number of complaints received.
 - Number resolved (upheld/rejected).
 - Pending or unresolved complaints.
 - Complaints by category.
 - Cases referred to ADR.
 - Cases pursued through legal action.
3. Maintain transparency in complaint handling and compliance with ADR outcomes.
4. Retain complaint records for five years or as required by data protection or statutory laws.
5. Provide complaint records to the CGA upon request.

7. Terms and Conditions

Hongda's Complaints Procedure is:

- Clearly outlined in the Terms and Conditions, and
- Published on the official website as a standalone document.

It includes:

1. Contact methods for customer service.
2. Complaint submission steps and links to the Complaint Form.
3. Resolution timelines.
4. Player rights regarding ADR and legal escalation.
5. Information on ADR effects and consequences.
6. Details of ADR provider(s).

7. Clarification that the CGA does not mediate in individual disputes but may be contacted in case of regulatory violations.

8. Reasons for Complaint

Players may file complaints about any aspect of their interaction with Hongda, including but not limited to:

1. Deposits or withdrawals
2. Bonus terms or offers
3. Account restrictions or closures
4. Game fairness or outcomes
5. Responsible gaming measures
6. Balance treatment
7. KYC or verification processes
8. Data protection
9. Technical or software issues
10. AML-related concerns
11. Fraudulent activity or games
12. Regulatory compliance
13. Unfair contractual terms

9. Transition Deadline

Hongda Information Technology B.V. will upload this Complaints Policy to the CGA Portal, in accordance with Article 5.3 of the LOK.

Approved by:

Board of Directors – Hongda Information Technology B.V.

Date: March 2026