

Player Complaints Policy

elitbahis.com is operated by **Venus International B.V.**, a company incorporated under the laws of Curaçao with Company Number 164106 and licensed by the Curaçao Gaming Authority ("CGA") to offer games of chance under license number **OGI/2024/1127/0766** in accordance with the National Ordinance on Games of Chance (Landsverordening op de kansspelen, P.B. 2024, no. 157).

This Player Complaints Policy explains how you can submit a complaint, how we handle and resolve complaints, and how you may escalate a dispute to an independent Alternative Dispute Resolution ("ADR") provider, in line with the requirements of the National Ordinance on Games of Chance and the CGA's complaints guidance.

This policy is part of, and should be read together with, our **Terms and Conditions**. It is available in English and in the other language(s) offered on our website. In case of any discrepancy between language versions, the English version will prevail.

1. Purpose and Scope

- This policy applies to all registered players of elitbahis.com.
 - It covers all complaints and disputes that arise from your use of our services, including (but not limited to) deposits, withdrawals, bonuses, account status, game fairness, responsible gaming, KYC/verification, and technical issues.
 - Our aim is to provide a **transparent, fair, and efficient** process that is free of charge for players and includes access to independent ADR.
-

2. Definitions

Player Interaction

Any written contact initiated by you (for example via live chat or email) to our customer support team, including general questions, feedback, or requests for assistance.

Complaint

A written expression of dissatisfaction relating to our services, decisions, terms, or conduct, where you clearly indicate that you are unhappy and expect a response or resolution.

For reporting purposes, a complaint is considered formally submitted when you have completed and sent us the **Complaint Submission Form** (see Section 3.2), and/or when the case has been escalated to ADR.

Dispute

A complaint that has not been resolved to your satisfaction through our internal complaints process and is then escalated either within our organisation or to an independent ADR provider (or to a court).

3. How to Submit a Complaint

3.1 Complaint Time Limits

- You may submit a complaint **free of charge** within **six (6) months** of:
 - the settlement of the bet; or
 - the incident or event you wish to complain about.
- For peer-to-peer games (such as poker) or ante-post fixed-odds bets, the six-month period starts from the settlement of the bet or the conclusion of the specific event.
- For in-play (live) betting complaints, you may still submit a complaint within six months, but earlier submission is strongly recommended because some data may no longer be reasonably available after a short period.

If a complaint is submitted outside the applicable time limits, we may decline to handle it, but we will always inform you of the reason.

3.2 Who Can Complain?

- Only the **registered account holder** may submit a complaint.
- Under Article 1.3(c) of the National Ordinance on Games of Chance, you are **not allowed to sell, donate, rent out, lease, pledge or otherwise transfer** any of your claims against the license holder (Venus International B.V.) to another person.
- We will therefore only discuss the complaint with you as the registered player.

3.3 Stages of the Internal Complaints Process

Our complaints process has the following stages:

1. Customer Support (First Line)

- In the first instance, please contact our customer support via:
 - **Live Chat:** [link / button]
 - **Email:** [support@elitbahis.com]
- Many issues can be resolved quickly at this stage.

2. Formal Complaint Submission Form

- If you are not satisfied with the initial response, or if you wish to make a formal complaint immediately, you should complete our **Complaint Submission Form**, available:
 - As an online web form: [link]

- And/or as a downloadable form (PDF/Word) that you can complete and send to us by email: [link].
- The form will request at least:
 - Your full name, address and country of residence
 - Your elitbahis.com account number/username
 - The date of the complaint and date of the disputed event
 - A clear description of the issue (you may be asked to select a category, e.g. deposit, withdrawal, bonus, game fairness, responsible gaming, etc.)
- You may be asked to provide reasonable supporting documents (screenshots, transaction records, correspondence, etc.) if necessary to investigate your complaint.

3. Internal Review and Final Decision

- Once we receive the completed Complaint Submission Form and any requested supporting information, we will carry out a full review and issue a **final written response** (see Section 4).

4. Escalation to ADR

- If you are not satisfied with our final response, you may escalate the dispute to an independent **CGA-certified ADR provider** (see Section 5).

4. Complaint Handling and Timelines

We distinguish between **Responsible Gaming complaints** and **all other complaint types**.

4.1 Responsible Gaming Complaints

Complaints related to responsible gaming (for example, issues concerning self-exclusion, cooling-off, handling of vulnerable players or the implementation of responsible gaming tools) are treated as a priority due to their potential impact on player well-being.

- We will use our best efforts to resolve such complaints **within five (5) business days**.
- Within **two (2) days** of receiving your responsible gaming complaint, we will:
 - Confirm **receipt in writing**;
 - Explain **how your complaint will be processed**; and
 - Indicate the **expected timeline for resolution**.
- If more time is reasonably needed (for example due to complexity), we may extend the resolution period by up to **two (2) additional weeks** and will inform you of the reasons.
- If a delay is caused by late or missing information from you, the resolution period may be extended by up to **another two (2) weeks**.

Once a complaint is identified as a Responsible Gaming complaint, **all direct communication with you about that complaint will be handled by human staff, not by automated systems or AI.**

4.2 All Other Complaint Types

For all non-responsible gaming complaints (such as financial, technical or account-related complaints):

- We will aim to assess and respond to your complaint within **four (4) weeks** of receipt of the completed Complaint Submission Form.
- Within **one (1) week** of receiving your complaint, we will:
 - Confirm **receipt in writing**;
 - Explain **how your complaint will be processed**; and
 - Indicate the **average timeline for resolution**.
- In complex cases or where further information is required, we may extend the four-week period **once**, by up to **an additional four (4) weeks**, and will notify you in writing.
- If we require further information from you, we will ask for it within the initial four-week period. If the requested information is not provided within a reasonable time, we may reject or close the complaint and will inform you of this.

4.3 Final Response

You will always receive a **final written decision**. This will include:

1. Our final reasoned assessment of your complaint, including any relevant supporting information or references; or
2. A clear explanation of why we are unable to handle your complaint (for example, if it falls outside the time limits or outside the scope of our services); and
3. Information about your right to **escalate the matter to an ADR provider** if you remain dissatisfied with the outcome.

5. Use of Artificial Intelligence (AI)

We may use automated systems or AI tools to support internal processes related to complaint handling (for example, categorising incoming messages or retrieving relevant account data). However:

- Complaints classified as **Responsible Gaming** or that are reasonably complex will be handled by human staff;
- Any AI-supported processes are monitored to ensure fair, consistent and reasonable outcomes;
- Your rights under this Complaints Policy and applicable laws are not affected by any use of AI tools.

6. Alternative Dispute Resolution (ADR)

If your complaint cannot be resolved through our internal process, you have the right to escalate it to an **independent ADR provider** that is certified or accepted by the CGA.

- We will provide you with the details of the relevant ADR provider(s) in our final response and in our **Terms and Conditions**.
- ADR is **free of charge for you**. We bear the costs of the ADR procedure.
- Once an ADR procedure has been completed, it cannot be re-opened with a different ADR entity for the same dispute.
- If you withdraw from the ADR process after it has started, you may not be able to re-submit the same dispute later.
- The legal effect and binding nature of the ADR decision on you and on us will be explained by the ADR provider and/or in our Terms and Conditions.

Your statutory right to bring legal proceedings before a court is not restricted by this ADR process, except where you and the ADR provider have separately agreed specific terms under applicable law.

7. Role of the Curaçao Gaming Authority (CGA)

- The CGA **does not act as a mediator** and does not make decisions on individual player complaints or gambling transactions on elitbahis.com.
- The CGA may, however, use information about complaints and disputes to carry out its **supervisory and enforcement** duties.
- You always retain the right to contact the CGA directly in relation to suspected malpractice, breaches of license conditions or regulatory concerns (including whistle-blowing), even if your individual complaint is being or has been handled by us or by ADR.
- Contact details and further information about the CGA can be found on the official CGA website: [insert CGA official link].

8. Record-Keeping and Reporting

In accordance with CGA requirements:

- We keep internal records of complaints and disputes, including those referred to ADR or to legal proceedings, for the period required under applicable law (or a shorter period if mandated by data protection or limitation rules).
- We submit periodic reports on complaints to the CGA as required, including:
 - Total number of complaints;
 - Number of complaints upheld, rejected, settled or pending;

- Complaints by category;
 - Number referred to ADR; and
 - Cases where players have taken legal action.
 - We cooperate with the CGA and ADR providers in supplying information related to complaints and disputes, in accordance with legal and data protection requirements.
-

9. Reasons for Complaint – Examples

You may file a complaint about any aspect of your relationship with us or any incident related to your participation in games of chance on elitbahis.com. This includes, but is not limited to:

1. Deposits and payment processing
2. Withdrawals and payout delays
3. Bonus offers, promotions and their terms
4. Account closure, suspension or restrictions
5. Alleged errors or unfairness in game outcomes
6. Responsible gaming tools, self-exclusion or cooling-off
7. Treatment and protection of player balances
8. KYC and identity verification procedures
9. Protection and use of your personal data
10. Technical problems or software malfunctions
11. Anti-money laundering related issues
12. Access by minors
13. Suspected fraudulent games or practices
14. Concerns about compliance with license or regulatory requirements

If you are unsure whether your issue qualifies as a complaint, please contact our customer support team. We will guide you through the process and help you submit a formal complaint if necessary.

10. Contact Details for Complaints

- **Customer Support (First Level):**
 - Live Chat: [link/button]
 - Email: [support@elitbahis.com]
- **Formal Complaint Submission Form:**
 - Online Form: [link]
 - Downloadable Form (PDF/Word):

Details of our ADR provider(s) and the CGA's contact information are also available in our **Terms and Conditions** and on our **Responsible Gaming / Legal Information** pages.