

Windward Circle B.V.

Player Complaints and Dispute Resolution Policy

Document Owner: Compliance Department

Version: 1.0

Effective Date: 01.01.2025

Review Date: Annually or upon regulatory change

Approved By: Management of Windward Circle B.V.



e-Management N.V.

1. Policy Overview

This Player Complaints and Dispute Resolution Policy ("Policy") sets out the framework used by Windward Circle B.V. ("Windward Circle", "the Company", "the Operator", "we", "our", or "us") to manage player complaints and disputes in a transparent, fair, efficient, and compliant manner.

This Policy is designed to align with the requirements of Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen – "LOK"), together with all applicable Curaçao Gaming Authority ("CGA") guidelines relating to player complaints and Alternative Dispute Resolution ("ADR").

Windward Circle B.V. is committed to ensuring that:

- Players have access to a straightforward and effective complaints procedure;
- Complaints are assessed fairly, consistently, and without unreasonable delay;
- Players are informed of their rights throughout the complaints process;
- Responsible gaming complaints receive priority handling;
- Players have access to independent ADR services free of charge where internal resolution is unsuccessful.

This Policy is available on the Operator's website and referenced within the applicable Terms and Conditions.

Nothing in this Policy limits any legal rights available to players under applicable law.

2. Definitions

2.1 Player Interaction

Any written communication initiated by a player and directed to the Operator's customer support team, including general enquiries, feedback, requests for information, assistance requests, or requests for clarification.

Players may submit a complaint by email or the available form on the website:
purecasino.co/info/complaints

2.2 Complaint

A written expression of dissatisfaction by a player relating to the Operator's services, decisions, terms, systems, conduct, or actions, where the player indicates dissatisfaction and expects a response or resolution.

For reporting purposes, a complaint is formally recognised once:

- A Complaint Submission Form has been submitted by the player; and/or
- A complaint has been received from a player's registered email address and/or
- A complaint has been escalated to ADR.

2.3 Dispute

A complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated internally or externally to an independent third party, including an ADR provider or court of law.

2.4 Responsible Gaming Complaint

A complaint relating to responsible gaming matters, including but not limited to:

- Self-exclusion;
 - Cooling-off periods;
 - Vulnerable player protections;
 - Responsible gaming intervention measures;
 - Access restrictions;
 - Gambling-related harm concerns.
-

3. Scope of the Policy

This Policy applies to all players using websites, platforms, and services operated by Windward Circle B.V. under applicable gaming licences.

Players may submit complaints free of charge within six (6) months from:

- The settlement of the relevant bet or wager; or
- The incident giving rise to the complaint.

For peer-to-peer (“P2P”) games and ante-post betting, the six-month period begins once the event or wager has concluded and settlement has occurred.

For in-running sports betting complaints, players are encouraged to submit complaints as soon as reasonably possible because certain technical or transactional data may only be retained for a limited period.

4. Complaints Submission Process

4.1 Initial Customer Support

In the first instance, players are encouraged to contact Customer Support through:

- Email support; and/or
- Complaint Submission form; and/or
- Live chat support.

Customer Support will attempt to resolve player concerns informally whenever possible.

4.2 Official Complaint Submission

If a player is dissatisfied with the outcome of initial support interactions, the player may submit a formal complaint using the official Complaint Submission Form available on the Operator’s website.

The Complaint Submission Form may be:

- Submitted online; and/or
- Downloaded, completed, and returned electronically.

The Complaint Submission Form includes:

1. Player full name;
2. Residential address and country of residence;
3. Player username;
4. Date of complaint;
5. Date of the disputed incident;

6. Description of the issue or conduct being disputed;
7. Relevant complaint category;
8. Supporting documentation or evidence where applicable.

The Complaint Submission Form is available in English and in the primary language used on the relevant website or domain.

The Operator may request additional supporting documentation where reasonably necessary for investigation and resolution purposes.

Detailed operational workflows, complaint handling instructions, investigation procedures, and system processing requirements are maintained within the Company's Complaint Handling Manual.

4.3 Restrictions on Complaints

Complaints may only be submitted by the registered account holder.

The Operator may refuse to process complaints submitted by third parties unless legally required to do so.

Players may not transfer or assign claims relating to gaming activities in violation of applicable legal or regulatory requirements.

5. Complaint Categories

Players may submit complaints regarding any aspect of their relationship with the Operator, including but not limited to:

1. Deposit issues;
2. Withdrawal issues;
3. Bonus terms and conditions;
4. Account closures or restrictions;
5. Alleged game errors or unfair outcomes;
6. Responsible gaming matters;
7. Player balance handling;
8. KYC and verification procedures;
9. Data protection or privacy concerns;
10. Technical or software issues;
11. AML-related concerns;

12. Underage gambling concerns;
 13. Fraudulent games or practices;
 14. Licensing or regulatory concerns;
 15. Unfair terms and conditions.
-

6. Complaint Handling and Resolution Timelines

6.1 Responsible Gaming Complaints

Responsible gaming complaints are prioritised due to the potential impact on player wellbeing. Windward Circle B.V. will use best efforts to resolve responsible gaming complaints within five (5) business days.

Within two (2) business days of receiving a responsible gaming complaint, the Operator will:

- Confirm receipt of the complaint in writing;
- Explain how the complaint will be processed;
- Provide an estimated resolution timeline.

If additional time is reasonably necessary, the player will be informed in writing. Any extension:

- Shall not exceed two (2) additional weeks; and
- May only be extended by a further two (2) weeks where delays are caused by the player's failure to provide requested information.

Complaints involving self-exclusion failures, vulnerable player concerns, or potential gambling-related harm shall be escalated to the Responsible Gaming Officer and reviewed as a priority matter.

6.2 All Other Complaint Types

All other complaints shall be assessed and responded to within four (4) weeks.

Within forty-eight (48) hours of receiving a complaint, the Operator will:

- Confirm receipt of the complaint in writing;
- Explain the complaint handling process;
- Provide an estimated timeline for resolution.

Where reasonably necessary due to complexity or missing information, the Operator may extend the resolution period once by up to four (4) additional weeks.

Players shall be notified in writing before any extension takes effect.

7. Complaint Resolution Outcomes

All final complaint determinations are provided to the player in writing.

The Operator's response may include:

1. A reasoned final assessment and outcome, including supporting evidence where applicable;
2. A request for additional information necessary to complete the investigation;
3. A rejection of the complaint where the player fails to provide reasonably requested information within the applicable timeframe;
4. Information regarding escalation rights to ADR.

Where a player remains dissatisfied with the outcome, the player may escalate the matter to an independent ADR provider.

During the investigation of a complaint, players shall not be subject to unreasonable restrictions or account measures solely because a complaint has been submitted, unless such measures are required by law, AML/CFT obligations, fraud prevention requirements, responsible gaming considerations, or platform security controls.

8. Artificial Intelligence (AI)

Windward Circle B.V. may utilise artificial intelligence tools to support complaint handling processes, provided that:

1. Responsible gaming complaints are handled by appropriately trained human personnel;
2. Complex complaints are reviewed and resolved by human personnel;
3. AI-generated outputs are monitored to ensure fairness, consistency, accuracy, and regulatory compliance.

The Operator remains fully responsible for all complaint handling decisions, regardless of whether AI tools are utilised.

9. Alternative Dispute Resolution (ADR)

Windward Circle B.V. provides access to independent ADR services in accordance with applicable regulatory requirements.

9.1 ADR Eligibility

If a complaint cannot be resolved internally, the player may escalate the matter to an approved independent ADR provider.

ADR services are available to players free of charge.

The Operator will bear the costs associated with the ADR process unless otherwise permitted by law.

9.2 ADR Process

The following principles apply to ADR:

- Full details of the ADR process are available within the Terms and Conditions;
- ADR may only commence after the internal complaints process has concluded or reasonable resolution attempts have failed;
- Once ADR proceedings have concluded, the same matter may not be re-opened with a different ADR entity;
- If a player voluntarily withdraws from an ADR process after commencement, the Operator may consider the matter closed;
- ADR outcomes may affect the player's right to pursue further legal remedies depending on applicable law and ADR terms.

9.3 ADR Provider Information

Details of the Operator's appointed ADR provider(s), including contact information and submission procedures, are available on the Operator's website and/or Terms and Conditions.

10. Role of the Curaçao Gaming Authority (CGA)

The Curaçao Gaming Authority does not mediate or determine individual player complaints relating to gambling transactions. Nothing in this Policy prevents a player from submitting information directly to the Curaçao Gaming Authority where the player believes a regulatory breach has occurred.

However:

- Players may contact the CGA regarding suspected regulatory breaches, malpractice, licence condition violations, or whistleblowing concerns;
- The CGA may use complaint-related information for supervisory, monitoring, and enforcement purposes;
- The CGA reserves the right to request complaint records and documentation from the Operator.

Unless complaint handling is deemed inadequate or non-compliant, decisions made by the Operator and/or ADR providers will generally not be reviewed or overturned by the CGA.

11. Record Keeping and Reporting

Windward Circle B.V. maintains accurate records relating to all formal complaints and disputes.

The Operator:

1. Submits complaint reports to the CGA in accordance with applicable regulatory reporting requirements;
2. Maintains records regarding:
 - Total complaints received;
 - Complaint categories;
 - Complaint outcomes;
 - Pending complaints;
 - Complaints escalated to ADR;
 - Complaints involving legal proceedings;
3. Complaint records, investigation files, communications, decisions, ADR records and supporting documentation shall be retained for a minimum period of five (5) years and longer where required by applicable law.

Complaint records are stored securely and processed in accordance with applicable data protection requirements.

12. Terms and Conditions Disclosure

The Operator's complaints procedure is clearly accessible on the website as a standalone policy within the Terms and Conditions

The following information is available to players:

1. Customer support contact methods;
 2. Complaint submission procedures;
 3. Complaint form access details;
 4. Resolution timelines;
 5. Player rights relating to complaints and ADR;
 6. ADR provider details and procedures;
 7. Explanation of the consequences of ADR outcomes;
 8. Information clarifying that the CGA does not mediate individual disputes.
-

13. Data Protection and Confidentiality

All complaint information and supporting documentation are processed confidentially and in accordance with applicable data protection laws.

Information is only disclosed:

- Where necessary for complaint investigation and resolution;
 - To ADR providers where applicable;
 - To regulators, law enforcement, or competent authorities where legally required.
-

14. Monitoring and Review

This Policy is reviewed periodically and updated whenever necessary to reflect:

- Regulatory changes;
- Operational developments;
- Best practices;
- Findings from internal audits, complaint trends, or compliance reviews.

The Compliance Department is responsible for monitoring implementation and ensuring ongoing adherence to this Policy. Complaint trend analysis, root-cause analysis, and recurring issue identification shall be reported to Senior Management periodically to support continuous improvement and regulatory compliance.

15. Contact Information

Players may submit complaints or contact Customer Support using the contact details published on the applicable Windward Circle B.V. website: support@purecasino.co

Formal complaints should be submitted through the official Complaint Submission Form available on the website.

ADR provider details are also published on the website and within the applicable Terms and Conditions.

16. Policy Approval

This Policy has been approved by the management of Windward Circle B.V. and is effective from the Effective Date stated above.

Player Complaint policy May 2026_v1.0

Final Audit Report

2026-06-25

Created:	2026-06-25
By:	Bryon Finies (bryon.finies@hbmgroup.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAlhmemHyrio2ZkAyT7J_C9IHcVo2fx

"Player Complaint policy May 2026_v1.0" History

-  Document created by Bryon Finies (bryon.finies@hbmgroup.com)
2026-06-25 - 1:12:29 AM GMT
-  Document emailed to Annesol Melaria (annesol.melaria@hbmgroup.com) for signature
2026-06-25 - 1:12:33 AM GMT
-  Email viewed by Annesol Melaria (annesol.melaria@hbmgroup.com)
2026-06-25 - 2:55:35 PM GMT
-  Document e-signed by Annesol Melaria (annesol.melaria@hbmgroup.com)
Signature Date: 2026-06-25 - 2:57:47 PM GMT - Time Source: server - Signature Appearance Selected: IMAGE
-  Agreement completed.
2026-06-25 - 2:57:47 PM GMT