



Players Complaints Policy

Version Control

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1. Introduction

Moonrail Limited B.V. ('the Company'), which currently manages the brand CSGOEmpire, is committed to providing an enjoyable gambling experience for all players on our platform. In addition to the Company's legal obligations as a licensed online gambling operator under the laws of Curaçao, and in accordance with the provision 5.3 of the National Ordinance on Games of Chance (LOK), the Company recognizes that issues may occasionally arise. As such, the Company takes all player complaints seriously and is dedicated to addressing them promptly and fairly.

2. Purpose and Scope

This policy outlines the process for submitting player complaints, the methods through which they can be submitted, and the procedures for handling and resolving such complaints and disputes. In doing so, the Company aims to ensure a transparent, fair, and straightforward complaints process for every player.

3. Complaint Categorization

Players have the right to file a complaint concerning any aspect of their business relationship with us, especially in cases involving incidents related to their participation on the Company's platform. To manage complaints effectively, the Company commits to categorizing complaints and promptly identifying those that require immediate attention such as matters regarding Responsible Gambling.

Complaints may be classified under, but are not restricted to, the following categories:

- **Deposit Issues:** Problems encountered while making deposits.
- **Withdrawal Issues:** Problems encountered while attempting to withdraw funds.
- **Bonus:** Disputes related to the application or interpretation of bonus rules.
- **Account Closures or Restrictions:** Concerns regarding the suspension, closure, or limitations placed on a player's account.
- **Alleged Errors or Unfairness in Game Outcomes:** Claims of inaccuracies or bias in game results.
- **Responsible Gaming Issues:** Concerns related to our responsible gaming tools or their application.
- **Treatment of Player Balances:** Issues concerning the handling or management of player funds.
- **Know Your Customer (KYC) and Verification:** Complaints regarding the account verification process.
- **Data Protection:** Concerns about the handling and security of personal data.
- **Technical or Software Issues:** Problems arising from platform malfunctions or software errors.
- **Anti-Money Laundering (AML) Concerns:** Reports or issues related to our AML procedures.
- **Issues with Minors:** Concerns regarding underage access to our platform.
- **Fraudulent Games:** Allegations of manipulation or unfairness in the games offered.

- **Fraudulent Practices:** Concerns about suspected dishonest or misleading activities by the Company or other players.
- **License or Regulation:** Complaints related to the Company's compliance with licensing requirements and regulations.

The list of complaint categories provided above serves as a general guide and is not exhaustive. Players are encouraged to submit complaints regarding any matter of concern, regardless of whether it aligns with a listed category. All complaints will be reviewed and appropriately categorized during the complaint handling process to ensure effective and timely resolution.

4. Complaint Submission

Players can submit their complaints to the Company through the following method:

Email: Players may submit their complaints via email to: support@csgoempire.com

Complaints may be submitted in English or any additional languages where the Company actively markets its services

4.1. Required Information

To ensure proper and efficient handling of the Complaint, the following information should be provided via email to the Company:

- Name, residential address and country of residence of Complainant;
- Player's username or Player ID of the Complainant (if applicable);
- Date of the Complaint;
- Email address of the Complainant;
- Detailed description of the issue being disputed;
- Information on if the Complainant has previously contacted the Company regarding the issue;
- Supporting documents of the Complaint to be provided at the discretion of the player, such as screenshots, videos or transaction IDs.

4.2. Complaint Handling Procedure

Timeframe Complaint submission: A player may submit a Complaint to the Company at any time, provided it is within six (6) months of the incident related to their participation on the platform.

Acknowledgement: Once the Complaint is received by the Company, the Company will promptly confirm the receipt of the complaint via email, however within seven (7) days and inform the player by return of the Complaint handling process. The acknowledgment will include a complaint reference number for tracking purposes and an expected timeline for resolution.

Investigation: The Company's Complaints team will review, assess and investigate the submitted Complaint. During this process, the Company reserves the right to request further information and/or documentation from the Complainant in order to properly address the Complaint fully.

Resolution timeline: Within an initial period of four (4) weeks, the Company's Complaints team will conduct its investigation and provide a response to the Complainant of his/her Complaint. This period can be extended for an additional four (4) weeks after notifying the Complainant through email of the extension.

Resolution: Once the investigation has been concluded, a final determination based on the Company's findings, will be provided to the Complainant in writing through e-mail.

The final determination shall be one of the following:

- A clear and substantiated final decision on the Complaint supported by evidence where applicable.
- A clear and substantiated explanation for declining to handle the Complaint.

4.2.1. Complaint procedure regarding Responsible Gaming

The Company acknowledges its responsibility in ensuring a safe and enjoyable gambling experience for players on its platform and protecting them from gambling harm and addiction due to lack of self-control. That is why Complaints regarding responsible gaming will be prioritized above all other Complaints.

Acknowledgement: Once the Complaint is received by the Company, the Company will confirm the receipt of the complaint via email within five (5) days and inform the player by return of the Complaint handling process. The acknowledgment will include a complaint reference number for tracking purposes and an expected resolution timeline of maximum (2) weeks for resolution.

Investigation: The Company's Complaints team will review, assess and investigate the submitted Complaint. During this process, the Company reserves the right to request further information and/or documentation from the Complainant in order to properly address the Complaint fully.

Resolution timeline: Within a period of maximum (2) weeks, the Company's Complaints team will conduct its investigation and provide a response to the Complainant of his/her Complaint. This period will not be extended considering the severity of the Complaint.

Resolution: Upon conclusion of the investigation, the Company will issue a final determination based on its findings and with due consideration of the Complainant's requested resolution (e.g., self-exclusion, time limits, or temporary account suspension). This outcome will be communicated to the Complainant in writing via email.

5. Escalation Options

If a player is dissatisfied with the final outcome of the Company's determination, they are entitled to escalate the matter through one or more of the following channels:

1. Alternative Dispute Resolution
2. Legal recourse

5.1. Alternative Dispute Resolution

As a licensed operator, the Company acknowledges its legal responsibility to offer alternative dispute resolution to players as an option to find resolution to their complaints. On a short-term basis, the Company intends to fully comply in offering the option of ADR-option by a independent third party.

5.2. Legal Recourse

While the Company is committed to resolving all player complaints internally in a fair and satisfactory manner, it fully recognizes and respects each player's legal rights. If a player remains dissatisfied with the outcome of the complaint process, they retain the right to pursue legal action through the appropriate court system. Should this occur, the Company will fully cooperate with the legal proceedings and provide any necessary documentation or information to support the process.

5.3. Escalation to Curaçao Gaming Authority

The Company, as a licensed gaming operator, is subject to the supervision of the Curaçao Gaming Authority (CGA). CGA does not mediate or resolve individual disputes or gambling-related transactions between players and operators. However, players may report any suspected breaches of regulatory obligations or violations of license conditions of the Company, directly to the CGA. This will be communicated in the Terms & Conditions of the Company.

6. Monitoring and Record Keeping

The Company ensures to record all complaints regardless of the submission method for efficient management, monitoring, trend analysis and regulatory compliance. Complaints will be logged and managed within a centralized complaint management system.

The following key data will be recorded for each Complaint:

- **Complaint Reference Number:** Issued upon acknowledgment of complaint
- **Date of Complaint:** Date of submission of Complaint

- **Player Information:**
 - Full name
 - Username or Player ID
 - Residential address including country of residence
 - Email address
 - Phone number, if provided
- **Complaint Categorization:** assignment of relevant categories to the complaint, see paragraph 2).
- **Complaint Details:**
 - Date of Complaint; Date of submission of Complaint
 - Detailed Description of the issue
 - Supporting Evidence (record of videos, screenshots, transaction logs in the form of attachments of links provided).
- **Resolution Details:**
 - Specific actions taken to resolve the complaint (e.g., account adjustments, bug fixes, policy clarifications);
 - Date of Resolution and communication to player.

The recorded data will be securely stored for at least five (5) years.

7. Regulatory Reporting

In accordance with the regulatory requirement, the Company will submit a Complaints report yearly on the 15th of January and the 15th of June, to CGA. The Complaints Report shall include the following information:

1. Total number of Complaints received
2. Total number of complaints closed (settled and rejected)
3. Number of pending or unresolved complaints
4. Number of complaints by category
5. Number referred to ADR and the subsequent outcome of each
6. Number and detail of Complaints for which the player has taken legal action

8. Monitoring and Review

This policy and procedure document will be reviewed every (6) months or in response to regulatory and operational changes, or feedback from players and stakeholders. The review will be performed by the Compliance Officer in conjunction with the Compliance Consultant of the Company.

The scope of the review shall consider the following:

- The effectiveness of the Company's Complaint submission process
- The effectiveness of the Company's Complaint handling process
- The efficiency and fairness of the resolution process
- Changes in relevant legislation, regulations, guidelines or best practices with the online gambling industry.