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Player Complaints Policy

Policy Overview
This Black Ocean B.V. (the Operator – hereof) Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).
Adherence to this Complaints Policy is considered a requirement under the LOK, and failure to comply will be addressed by the Curacao Gaming Authority (C enforcement procedures.
The Complaints Policy guarantees players access to a straightforward and effective dispute resolution process, including free alternative dispute resolution independence.
In accordance with Article 5.3 of the LOK, further rules, policies and guidelines regarding complaints and ADR processes may be established.
Execution of this Complaints policy is the responsibility of the operator Compliance Role representative.

Procedure for Complaints

Submitting a Complaint
1. Players may lodge a complaint free of charge within six months of the incident related to their participation in a game of chance or in the case of P2P (such a six month clock begins after the resolution of the specific event rather than the placement of the wager.
2. Complaints must be submitted using a clearly outlined methodology (online form or complaints template in a downloadable Word or PDF that can be ema accessible on the operator’s website and also referenced in the Terms and Conditions. The complaint form complies with the guidelines provided by the CGA.
3. The form must include:
a. Complainant's name, address, and place of residence.
b. Complainant's account number (if applicable)4
c. Date of the complaint.
d. Description of the conduct being disputed (using pre-determined category topics if applicable).
e. Language options: English, Dutch, or Papiamentu, as required by the LOK. The Company may, at its sole discretion, accept complaints in other languages o will only take place in the specified official languages.
f. Any supporting documentation the player requires to include as part of the complaint.

Complaint Resolution – Responsible Gaming
Complaints related to responsible gaming will be prioritized due to potential impacts on player well-being. Operator will adhere to the Responsible Gaming policy within the scope of that policy are considered subject to this clause.
Operators will use best in efforts resolve these cases within five business days. If more time is needed, players will be informed of the delay, which cannot exceed

Complaint Resolution – General

Acknowledgement
Within one week of receiving a complaint, the operator will:
1. Confirm receipt of the complaint in writing via email or preferred communication method.
2. Provide an explanation of how the complaint will be processed.
3. Expected timeline for resolution.

Response and Resolution
The operator will assess and respond to complaints within four weeks. If necessary due to complexity or lack of information, this period may be extended once by notice to the complainant.
A player will always receive a final determination of their complaint in writing.
The response will be either:
1. A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
2. Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the operator will requeste this period. Should the complainant not provide the necessary information within that time period, the operator may reject the complaint.
Where for any reason the operator does nor or is unable to resolve an issue to the player’s satisfaction, the player is informed that the matter may be escalated by

Alternative Dispute Resolution (ADR)

Access to ADR
1. In order to be compliant with their license conditions as mandated by the LOK, operator offers independent ADR services to their players.
2. Operators will uploaded to the CGA Portal an agreement with at least one CGA Certified ADR entity, within one month of the publication of the Certified ADRs o
3. If a complaint cannot be resolved internally, players are entitled to escalate the matter to an independent ADR provider, free of charge. For avoidance of doubt process.
4. The contact information for the ADR provider will be included in all complaint communications and in the Terms and Conditions of the operator’s website.
5. The CGA does not make ADR mandatory for the player as part of the escalation process, but it is at the discretion of the operator as to whether or not they do their own Terms and Conditions.

Legal proceedings

Any complaints escalated to legal proceedings will be subject to Curaçao law, and disputes will be resolved by the courts of Curaçao, as stipulated in the gaming a

Authority Escalation

The CGA will not resolve or make decisions on complaints regarding gambling-related transactions. The operator makes this clear to the player in its Complain however of a player believes the operator is in breach of regulations, they may contact the Curacao Gaming Authority via an Online Form available on the CGA w

While the CGA not mediate in individual disputes but may use the information to support its supervisory activities.

Player Support and Reporting

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Contact Points
Players may submit complaints via one or more of the following:
1. Email;
2. Online form.

Record-Keeping
1. Operator keeps a log of all complaints, including those;
a. Resolved internally (whether upheld or rejected);
b. Unresolved;
c. Escalated to ADR;
d. Escalated to legal proceedings;
2. All complaint records will be securely maintained for at least five years under the National Ordinance on Games of Chance and applicable Curaçao data prot and complaints that have been escalated to ADR or legal proceedings.

Regulatory Reporting
The operator will:
1. Submit reports to the CGA on January 15th and June 15th and every year, summarizing the following:
a. Total number of complaints made;
b. Total number of complaints closed (settled and rejected);
c. Number of pending or unresolved complaints;
d. Number of complaints by category;
e. Number referred to ADR and the subsequent outcomes of each;
f. Number and detail of complaints for which a player has taken legal action;
2. Ensure transparency and compliance with ADR decisions and regulatory updates.
3. The CGA reserves the right to request, at any time, access to records of any and all complaints received as well as any disputes that are pending resolution.

Reasons for Complaint
The player has the right to make a complaint regarding any part of their relationship with the operator or any incident related to their participation in a game of cha
1. Deposit issues;
2. Withdrawal issues;
3. Bonus terms and conditions;
4. Account closures or restrictions;
5. Alleged errors or unfairness in game outcomes;
6. Responsible gaming issues;
7. Treatment of player balances;
8. KYC and Verification;
9. Data Protection;
10. Technical or Software issues;
11. AML concerns;
12. Issues with minors;
13. Fraudulent games;
14. Fraudulent practices;
15. License or regulation.

SignedThis10 dayof April 2025

Director: Xecutive Corporate Management B.V.

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