

Complaint Handling Policy

1. Purpose

This Complaint Handling Policy outlines the procedures for the fair, transparent, and timely handling of player complaints. The Company is committed to maintaining high standards of customer service and regulatory compliance in accordance with the requirements applicable to operators licensed under the Curaçao Gaming Authority (CGA) framework.

The purpose of this policy is to ensure that all customer complaints are handled consistently, professionally, and within reasonable timeframes.

2. Scope

This policy applies to all complaints relating to the Company's products, services, operations, employees, or third-party providers acting on behalf of the Company, including but not limited to:

- Account registration and verification
- Deposits and withdrawals
- Payment processing
- Game functionality and outcomes
- Bonuses and promotional campaigns
- Responsible gambling concerns
- Customer support interactions
- Data protection and privacy matters

3. Definition of a Complaint

A complaint is defined as any expression of dissatisfaction made by a customer regarding the Company's services or operations where a response or resolution is expected.

4. Submission of Complaints

Customers may submit complaints to the Company through the following channels:

- Email communication
- Website contact forms

- Live chat support, where available

Complaints, escalation requests, and concerns relating to the handling of personal data may be submitted directly to the Company at compliance@hnagaming.com

To enable efficient investigation and resolution, customers should provide:

- Username or account identification number
- Description of the issue
- Date and time of the incident
- Supporting documentation or screenshots, where applicable

5. Acknowledgement of Complaints

The Company will acknowledge receipt of a complaint within twenty-four (24) hours of receipt where reasonably practicable.

Where immediate resolution is not possible, the customer will be informed that the matter is under review.

6. Investigation Procedure

All complaints will be reviewed by the relevant department or designated compliance representative.

Investigations may include:

- Review of account activity and transaction history
- Examination of game logs and technical records
- Assessment of internal communications and procedures
- Consultation with payment service providers or third-party suppliers where necessary

The Company aims to resolve complaints within ten (10) business days. Where additional time is required due to the complexity of the matter, the customer will be informed accordingly.

7. Resolution and Outcome

Following completion of the investigation, the customer will receive a written response outlining:

- The findings of the investigation
- The Company's final decision
- Any corrective or remedial action taken where applicable
- Available escalation options if the customer remains dissatisfied

8. Escalation Procedure

If a customer is dissatisfied with the outcome of a complaint, the matter may be escalated for secondary review by a senior manager or compliance representative not involved in the initial assessment.

Where required under applicable regulations or licensing obligations, unresolved disputes may be referred to an authorised Alternative Dispute Resolution (ADR) entity or relevant supervisory authority.

9. Record Keeping

The Company shall maintain records of all complaints, investigations, communications, and resolutions in accordance with applicable legal and regulatory requirements.

Complaint records will be retained securely and treated as confidential.

10. Fair Treatment of Customers

The Company is committed to handling all complaints fairly, transparently, and without discrimination.

Customers will not be disadvantaged or penalised for submitting a complaint.

Particular care will be taken when handling matters involving:

- Vulnerable persons
 - Responsible gambling concerns
 - Financial disputes
 - Data protection matters
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11. Data Protection and Confidentiality

All personal data processed in connection with complaints will be handled in accordance with applicable data protection laws and the Company's Privacy Policy.

Information submitted as part of a complaint will only be accessed by authorised personnel for the purpose of investigating and resolving the matter. Complaints can be sent to dpo@hnagaming.com

12. Policy Review

This policy shall be reviewed periodically to ensure continued compliance with regulatory obligations, operational standards, and industry best practices.