

GEM Solutions B.V.

Complaints Policy

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Approval:

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1. Policy Overview

Zoecasino, operated by GEM Solutions B.V., a Curacao Gaming Authority (CGA) licensed entity under license number OGL/2024/1232/0584, is committed to delivering a fair, transparent, and timely complaints resolution process. This policy outlines how players can raise concerns and how those concerns will be managed, in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK).

This policy applies to all registered players of www.zoecasino.com and includes access to free Alternative Dispute Resolution (ADR) services.

2. Definitions

- **Player Interaction:** Any written communication between the player and Zoecasino.
- **Complaint:** A written expression of dissatisfaction related to our services or decisions, requiring a response. A complaint is considered when a Complaint Submission Form has been submitted by the player to the operator and/or a complaint has been escalated to Alternative Dispute Resolution.
- **Dispute:** A complaint that has not been resolved to the player's satisfaction and has been escalated to an independent Alternative Dispute Resolution provider or a court of law.

3. How to Submit a Complaint

3.1 Who can Submit a Complaint

- Only the registered player may submit or pursue a complaint. Claims cannot be assigned to third parties.

3.2 Complaint Submission Window

- Any claim regarding a transaction in conjunction with a Player's Account shall be made to Us within six months after the transaction, payment and/or settlement took place, or should have taken place; otherwise Zoecasino reserves the right, at its own discretion, not to consider the claim.
- For P2P/ante-post, the six-month period starts from settlement/conclusion. For in-running complaints, prompt action may be necessary as certain data may not be retained beyond a short period.

3.3 Submission Process

1. If an Account Holder wishes to lodge a complaint, the Account Holder must complete the Zoecasino Complaint Submission Form, available as a downloadable PDF via the website or upon request from Support. This form is the official method for submitting a complaint and allows us to record, review and respond properly. The form is provided in English and in the language of the website used by the player.

2. A complaint is treated as formally submitted once the completed Complaint Submission Form has been received by Zoecasino.
3. To help us assess the matter quickly and accurately, the Complaint Submission Form requests the following minimum information:
 - Full name
 - Residential address and country
 - Zoecasino account username or ID
 - Date the complaint is submitted
 - Date of the event being disputed
 - Complaint category (selected from a list of predefined options)
 - Description of the issue (free-text)
 - Any supporting documents or screenshots
 - Confirmation from the Account Holder that the information provided is true and complete
4. Zoecasino may request further details where this is reasonably needed to investigate the matter
5. A completed Complaint Submission Form can be submitted via:
 - Live Chat
 - Email: support@zoecasino.com
6. If a dispute should occur between Zoecasino and the Account Holder, Zoecasino will make accessible to the Account Holder a detailed transaction record. Such information will also be made available to a legitimate third party (e.g. a judge or court) if Zoecasino deems it necessary or if it is required by a legitimate authority.

4. Complaint Resolution Process

4.1 Responsible Gaming Complaints

- Prioritized due to potential player harm.
- Acknowledgment of receipt sent within **2 days**, including processing details and resolution timeline.
- Resolved within **5 business days**.
- If more time is needed to reach a reasonable decision, we will inform the player; any operator-driven delay will not exceed **2 weeks**. If delay is due to the player, the period may be extended by no more than a further **2 weeks**.

4.2 All Other Complaints

- Acknowledgment of receipt sent within **7 day**, stating process and average timeline.
- Aimed to be resolved within **4 weeks**; extendable by another **4 weeks** with notice if necessary.

4.3 Final Response Content

- Players receive a final written determination:
 - a reasoned outcome with supporting rationale; or
 - reasons for not handling (where necessary info was requested within the initial 4 weeks); or
 - if unsatisfied, information on escalating to ADR.

4.4 Use of Artificial Intelligence

- AI may assist in non-complex complaint handling. Any AI assistance is monitored to ensure outputs are reasonable and consistent across similar cases.
- Responsible Gaming and complex cases will be handled by human agents.

5. Alternative Dispute Resolution (ADR)

Zoecasino maintains an agreement with at least one CGA-certified ADR provider. ADR is free to players.

Once ADR is completed, the matter cannot be recommenced with another ADR. If the player drops out after ADR begins, the dispute cannot be resurfaced.

Zoecasino does not currently impose minimum claim values or sequencing constraints for ADR. Any future parameters will be transparent, proportionate, legally vetted, and will not limit RG-related disputes by monetary value.

6. Record-Keeping and Reporting

Zoecasino maintains full records of all complaints and records are kept for up to 5 years or as required by law. Records are maintained in a secure register; the CGA may request access at any time.

Zoecasino submits bi-annual reports to the CGA, covering: totals, settled (upheld/rejected), pending, by category, ADR referrals, and legal actions.

7. Player Rights & Information

- Players have the right to complain about any aspect of their interaction with Zoecasino, including (but not limited to):
 - Deposits, withdrawals, bonus terms, account restrictions, game fairness, responsible gaming, KYC/AML, data privacy, technical issues.

- Players may contact the CGA regarding regulatory breaches, but not individual dispute mediation.
- All record requests review will be subject to applicable data protection laws and legitimate requests.

8. ContactCustomer Support:

Email: support@zoecasino.com

9. Policy Publication and Acceptance

- This policy is linked in our website footer and player registration flow.
- Acceptance of the policy is confirmed during account creation.
- Full Complaints Policy and procedures are integrated into our Terms and Conditions.