

Administrative information

Company name: Esti Technologies N.V.
Registration number: 157981;
Address: Schottegatweg Oost 10 Unit 1-9,
Bon Bini Business Center;

This Complaints Policy shall apply to all branches and subsidiaries of Esti Technologies N.V. (hereinafter the Operator or the Company).

This Complaints Policy includes the following information for website players:

1. Links to customer service and information on how to contact the operator.
2. Detail of information required for a player to make a complaint.
the online form or the downloadable PDF/Word document.
3. Timelines for responses and resolution.
4. Player rights to complain including explicit rights to ADR services and regulatory escalation.
5. An explanation of the potential consequences of the relevant ADR entity's decision, and the manner in which this will affect the player's right to further legal and judicial recourse.
6. Details of the ADR process and player rights.
7. Contact information for the ADR provider(s)
8. Clear information that the CGA does not mediate in individual disputes, but if the player feels the operator is in breach of regulations that the player may contact the CGA.

This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with 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 (CGA) in accordance with its monitoring and enforcement procedures.

The Complaints Policy guarantees players access to a straightforward and effective dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and 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 Risk department of the Company.

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 as poker) or ante post fixed odds betting the 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 in free-form that can be emailed to the operator), which is prominently accessible on the operator's website and also referenced in the Terms and Conditions.

3. The complaint must include:

- a. Complainant's name, address, and place of residence.
- b. Complainant's account number (if applicable)
- c. Date of the complaint.
- d. Description of the conduct being disputed (using pre-determined category topics if applicable).
- e. Language options: English or language of the target market.
- f. Any supporting documentation the player requires to include as part of the complaint.

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 chance. This includes (but is not limited to):

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

Complaint Resolution – Responsible Gaming

Complaints related to responsible gaming will be prioritized due to potential impacts on player well-being. Operator adheres to the Responsible Gaming policy issued by the CGA and complaints that fall within the scope of that policy are considered subject to this clause.

Operator must use best in efforts resolve these cases within five business days. If more time is needed, players must be informed of the delay, which cannot exceed two weeks.

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 an additional four weeks, with prior written 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 must have requested this information within the initial four week time 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 the player to an independent ADR entity.

Alternative Dispute Resolution (ADR)

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, the Operator will bear all costs of the ADR process.

The contact information for the ADR provider shall be included in all complaint communications and indicated in the operator's website.

If player believes the operator is in breach of regulations, they may contact the Curacao Gaming Authority via an Online Form available on the CGA website.

Please take into account, while the CGA not mediate in individual disputes but may use the information to support its supervisory activities.

Player Support and Reporting Contact Points

Players may submit complaints via one or more of the following:

1. Email
2. Online form

Record-Keeping

1. Operators must keep 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, including details of unresolved 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.