



Complaints Policy

For the offering of Online Gambling Under Licence From CGA

POL-CU-CP-01

Current Version

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1. Policy Overview

1.1 Introduction

This Complaints Policy outlines our framework for managing player complaints and disputes in a transparent, fair, and efficient manner. Our policy ensures compliance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the requirements set forth by the Curaçao Gaming Authority (CGA).

We are committed to providing our players with straightforward access to an effective complaint and dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

Key Principles:

- All complaints will be handled fairly and transparently
- Players have the right to escalate unresolved complaints to independent ADR
- We maintain detailed records of all complaints and their resolutions
- Responsible gaming complaints receive priority handling.

1.2 Legal Scope

The primary legislation regulating the online gambling industry in Curacao is the National Ordinance on Offshore Games of Hazard (Landsverordening buitengaats hazardspelen).

Additional laws and regulations on which this Complaints Policy is based consist of:

Laws and regulations	Abbreviation
the National Ordinance Identification for Services (Landsverordening identificatie bij dienstverlening, PB 2017, no. 92, GT);	NOIS
the National Ordinance Reporting Unusual Transactions (Landsverordening melding ongebruikelijke transacties, PB 2017, no. 99, GT);	NORUT
the Sanctions National Ordinance (Sanctielandsverordening, PB 2014, no. 55, GT);	SNO

Unless specified, this RG Policy refers to the above legislation as "applicable laws and regulations".

2. Definitions

2.1 Player Interaction

Any written communication initiated by a player and directed to our customer service team, including general enquiries, feedback, or requests for information, assistance, or clarification.

2.2 Complaint

A written expression of dissatisfaction by a player relating to our services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution. For reporting purposes, a complaint is when a Complaint Submission Form has been submitted by the player and/or a complaint has been escalated to ADR.

2.3 Dispute

A complaint that has not been resolved to the player's satisfaction through our internal complaints process and has been escalated to an independent third party (e.g., an ADR provider or court of law).

3. How to Submit a Complaint

3.1 Complaint Window

Players may lodge a complaint free of charge at any time up to six months from the settlement of the bet or incident they are complaining about

For P2P games (such as poker) or ante post fixed odds betting, the six-month period begins after bet settlement or conclusion of the specific event

For in-running sports betting complaints, prompt action may be necessary as investigation data may only be available for a short period

3.2 Contact Methods

Step 1: Initial Contact

Live Chat: Available 24/7 on our website

Email: support@rollbit.com

Step 2: Formal Complaint Submission

If your issue cannot be resolved through initial contact, you may submit a formal complaint by contacting our complaints and compliance team

Email: complaints@rollbit.com

Required Information:

Your full name, address, and place of residence

Your account number (if applicable)

Date of the complaint and date of the disputed event

Detailed description of the issue (select from predetermined categories where applicable)

Any supporting documentation (as reasonably required)

Confirmation that all information provided is complete and truthful

For account-related matters: Complete declaration of any associated accounts or relationships

Languages: Support is available in English only however automatic translation services (such as google translate) may be used if the user is unable to understand English responses.

4. Complaint Resolution Process

4.1 Responsible Gaming Complaints (Priority Handling)

Complaints related to responsible gaming receive priority treatment due to potential impacts on player well-being. These include complaints regarding:

- Targeting of vulnerable players
- Self-exclusion and cooling-off implementation
- Responsible gaming policy violations

Timeline:

Best efforts resolution: Within 5 business days

Acknowledgment: Within 2 business days, including:

- Email confirmation of receipt
- Explanation of how the complaint will be processed
- Average timeline for resolution

Extensions: Maximum 2 weeks if more time is needed, with player notification

Player delays: Additional 2 weeks if delays are due to slow player response

4.2 All Other Complaint Types

Timeline:

Standard resolution: Within 4 weeks

Acknowledgment: Within 1 week, including:

- Written confirmation of receipt
- Explanation of how the complaint will be processed
- Average timeline for resolution

Extensions: One additional 4-week period if necessary due to complexity, with prior written notice

4.3 Final Response

All players will receive a written final determination that includes either:

- Resolution: A reasoned final assessment with supporting evidence if deemed not business security sensitive
- Rejection: Detailed reasons for not handling the complaint, including any missing information that was requested within the initial timeframe
- Escalation Notice: If unsatisfied with our resolution, information about escalating to independent ADR (subject to eligibility requirements outlined in our ADR Guidelines)

4.4 Use of Artificial Intelligence (AI)

Responsible Gaming Complaints: Will be handled by human staff, not AI

Complex Complaints: Will be handled by human staff, not AI

AI Monitoring: All AI records are monitored for reasonableness and consistency

5. Alternative Dispute Resolution (ADR)

If you are not satisfied with our internal resolution, you have the right to escalate your complaint to an independent ADR provider free of charge.

5.1 ADR Process

Cost: We bear all costs of the ADR process

Independence: ADR providers are independent third parties certified by the CGA

Finality: Once ADR is completed, it cannot be recommenced with another ADR entity

Player Withdrawal: If you withdraw from ADR after it has begun, you cannot resurface the dispute in the future

5.2 ADR Eligibility Requirements

To access ADR services, you must:

- Have completed our full internal complaints process
- Demonstrate good faith engagement throughout the process
- Provide specific grounds for why our internal resolution was inadequate
- Meet any applicable minimum claim thresholds (details in our ADR Guidelines)

Enhanced Requirements for Certain Complaint Types:

- Account compliance matters may require additional documentation
- Repeat complaints require demonstration of new circumstances or procedural errors
- All ADR requests must include confirmation that information provided is complete and truthful

5.3 Our ADR Provider(s)

Primary ADR Provider: [To be updated once Official Approved ADR partners have been released]

Contact Information: [To be updated once contact details are known]

Website: [To be updated once contact details are known]

Process Details: [To be updated once contact details are known]

5.4 Legal Rights

ADR does not prevent you from taking legal action (except where mutually agreed under specific ADR terms)

Important: The ADR decision may affect your right to further legal and judicial recourse - please review the specific terms with the ADR provider

ADR proceedings are subject to eligibility criteria designed to ensure fair use and prevent abuse

6. Types of Complaints We Handle

You have the right to make a complaint regarding any aspect of your relationship with us, including but not limited to:

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues
- Treatment of player balances
- KYC and verification
- Data protection
- Technical or software issues
- AML concerns
- Issues involving minors
- Fraudulent games or practices
- License or regulation matters
- Unfair terms and conditions

7. Record Keeping and Reporting

We maintain comprehensive records of all complaints and provide regular reports to the CGA, including:

- Total number of complaints received and resolved
- Complaints by category
- Number of complaints referred to ADR
- Complaints resulting in legal action
- Pending or unresolved complaints

Record Retention: Records of unresolved complaints and those escalated to ADR or legal proceedings are kept for five years or as required by applicable laws.

8. Role of the Curaçao Gaming Authority (CGA)

Important Information:

- The CGA does not resolve individual player complaints regarding gambling transactions
- The CGA does not review or overturn decisions made by operators or ADR providers (unless inadequately handled)
- You may contact the CGA directly regarding malpractice, breach of license conditions, or whistleblowing
- The CGA uses complaint information for supervisory and enforcement purposes

CGA Contact Information:

Website: [Insert CGA website]

Email: [Insert CGA contact email if available]

9. Policy Updates

This policy may be updated from time to time in accordance with regulatory requirements. Any updates will be published on our website and communicated to players as required.

Last Updated: 24 Jul 2025

Next Review Date: December 25

This policy is based on the requirements of the National Ordinance on Games of Chance (LOK) and guidelines issued by the Curaçao Gaming Authority (CGA). It does not override applicable civil law obligations. Additional terms regarding account integrity and ADR eligibility are detailed in our supplementary policy guidelines. The Company will maintain comprehensive records related to customer due diligence, transactional activities, and any other relevant documentation in accordance with the applicable laws and regulations.

Records will be retained for a minimum period of 5 years.

The records will be easily accessible to authorised personnel, including the Compliance officer and relevant regulatory authorities for inspection or audit purposes.