

Player Complaints Handling Procedure

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Document Control

Version	Date	Description of Changes	Author
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1. Purpose

This Complaints Policy ensures that all player complaints and disputes are handled fairly, transparently, and in full compliance with Article 5.3 of the National Ordinance on Games of Chance (LOK).

2. Objectives

This policy, forming part of our Terms & Conditions, sets out the procedures for submitting, handling, and resolving complaints, ensuring all players have access to a free and fair process, including Alternative Dispute Resolution (ADR) services where applicable.

3. Responsibilities

The operator is responsible for promptly acknowledging, investigating, and resolving player complaints fairly and transparently, keeping the player informed throughout the process and providing timely updates on expected resolution timelines.

4. Procedure

4.1. Submitting a Complaint

4.1.1. A complaint is defined as a written expression of dissatisfaction related to our services, terms, or decisions, submitted by a registered player expecting a resolution.

4.1.2 Players may submit a complaint up to 6 months from the date of the incident or bet settlement.

4.1.3 How to submit:

- Live Chat: Available 24/7

4.1.4 Details to be included in:

- Full name, address and the place of residence
- Account Number
- Date of Complaint and incident
- Description of the issue
- Supporting document, if applicable

4.2 Complaint Handling Process

4.2.1 Responsible Gaming Complaints, prioritized based on potential harm, must be acknowledged within 2 business days with an explanation of the process and expected resolution timeline, resolved within 5 business days when possible, and may be delayed up to a maximum of 2 additional weeks with justification.

4.2.2 Other Complaints must be acknowledged within one week with an explanation of the process and the expected resolution timeline, resolved within four weeks when possible, and, if complex, may be extended once by up to an additional four weeks with prior written notice to the player.

4.2.3 The operator must provide a reasoned final assessment of the complaint, including supporting evidence if applicable, explain any decision not to handle it—requesting additional information within the initial four-week period and potentially rejecting the complaint if not provided—and inform the player that unresolved disputes may be escalated to the Curaçao Alternative Dispute Resolution Entity.

5 Alternative Dispute Resolution

5.1 Availability of Curaçao Alternative Dispute Resolution Entity

The Customer Support team must inform all customers of their right to escalate unresolved complaints to the Curaçao ADR Entity, with procedures accessible via the website and customer service channels.

5.2 Curaçao Alternative Dispute Resolution Entity Engagement

The Company engages the independent Curaçao ADR Entity, which provides binding adjudication for gaming-related complaints free of charge. All licensed operators under the National Ordinance on Games of Chance (LOK) are required to offer ADR in line with Curaçao Gaming Authority (CGA) guidelines.

5.3 Escalating to ADR

5.3.1 Players may use ADR if they have submitted a valid complaint through the operator's complaints form, received a final response, or the complaint was not resolved within the stated timelines (Sections 4.1 & 4.2), and remain dissatisfied with the outcome.

5.3.2 To initiate ADR, players must contact the operator's designated ADR entity, provide relevant evidence or communication history, and complete the ADR provider's application or complaint form.

5.4 The Company must have a formal agreement with at least one CGA-certified ADR provider (uploaded to the CGA portal), bear all ADR costs, ensure that once a case begins it is not filed with another ADR entity, consider cases abandoned by players as closed, and comply with ADR decisions while maintaining transparent records of all referred cases.

5.5 Possible ADR Outcomes

- Complaint upheld: Player receives compensation or corrective action (e.g., restored account, refunded bet).
- Complaint rejected: ADR finds no breach or wrongdoing by the operator.
- Partial resolution: The ADR proposes a compromise of settlement.

6 Record Keeping

6.1 The Company must keep a dated record of all complaints and interactions, including the reasons for resolutions or rejected complaints, for a minimum of five years from the date of the last customer interaction.

6.2 The Company reports complaints data to the Curaçao Gaming Authority twice yearly (by January 15 and June 15), summarizing: total complaints received; settled complaints (upheld and rejected); pending complaints; complaints by category; cases referred to ADR; and any complaints where legal action has been taken by a player.

7. Contact Information

- Customer Support: live chat