

Player Complaints Policy

1. Introduction

1.1 Purpose

This Player Complaints Policy (the "Policy") outlines the framework for managing and resolving player complaints at Elfy Interactive B.V. (the "Company"). The Policy ensures complaints are handled fairly, transparently, and efficiently, promoting player trust and compliance with LOK requirements. It provides clear procedures for submission, resolution, and escalation to free, independent Alternative Dispute Resolution (ADR), while clarifying that the CGA does not resolve individual complaints but oversees compliance.

1.2 Scope

This Policy applies to all complaints from registered players regarding the Company's services, decisions, terms, or conduct. It encompasses:

- Complaints related to deposits, withdrawals, bonuses, account actions, game fairness, responsible gaming, balances, KYC verification, data protection, technical issues, AML processes, fraud, access by minors, license or regulatory matters, and unfair terms.
- All employees, contractors, and third parties involved in complaint handling.
- Complaints submitted within six months of bet settlement or the incident (for peer-to-peer or ante-post betting, the clock starts after settlement or event conclusion; prompt action is advised for in-running betting due to potential data unavailability).

The Policy covers all aspects of the Company's B2C gaming activities, including online platforms and associated services. It does not restrict players' rights to legal action unless mutually agreed under ADR terms.

1.3 Objectives

- **Fairness:** Ensure complaints are investigated impartially using available evidence.
- **Transparency:** Provide clear communication on processes, timelines, and outcomes.
- **Timeliness:** Resolve complaints within specified periods, prioritizing responsible gaming issues.

- **Compliance:** Adhere to LOK, CGA guidelines, and applicable private law.
- **Player Protection:** Integrate with responsible gaming practices and offer free ADR escalation.

Non-compliance with this Policy may result in internal disciplinary actions or CGA enforcement measures.

2. Definitions

For clarity, the following terms are defined:

- **Player Interaction:** Any written communication from a player to customer service, including enquiries, feedback, or requests for assistance.
- **Complaint:** A written expression of dissatisfaction with the Company's services, decisions, or conduct, expecting a response or resolution. For reporting, this includes submissions via the Complaint Submission Form or escalations to ADR.
- **Dispute:** An unresolved complaint escalated internally or to ADR or a court.
- **Responsible Gaming Complaint:** Complaints involving vulnerable players, self-exclusion, addiction prevention, or similar issues.
- **ADR:** Alternative Dispute Resolution, an independent process for resolving disputes, provided free to players.

3. Governance and Responsibilities

3.1 Complaints Governance

Executive Management shall oversee the implementation, review, and continuous improvement of this Policy, with support from designated personnel as needed.

3.2 Roles and Responsibilities

- **Executive Management:** Provide leadership and resources for complaint handling; approve the Policy and ensure alignment with LOK requirements.
- **Designated Responsible:** Develop, implement, and monitor complaint processes; conduct investigations; integrate with AML/KYC, responsible gaming, and player protection measures; report to CGA.
- **All Employees and Contractors:** Adhere to procedures, report complaints promptly, maintain confidentiality, and participate in training. Customer support handles initial interactions via email and/or live chat.

Third-party vendors involved in services must align with this Policy via contracts.

4. Complaint Submission Process

The Company shall:

- Include or reference this Policy in the Terms and Conditions, with details on resolution stages, customer service contacts, complaint form links, timelines, ADR rights, and CGA's oversight role (noting CGA does not mediate individual disputes).
- Make the Policy visible on the website as a standalone document, linked from the homepage and/or registration page.
- Offer initial support via email and/or live chat.
- Provide an official Complaint Submission Form (downloadable or online) in English and the website's primary language, including fields for: player's name, address, residence, account number (if applicable), complaint date, incident date, description (with optional categories), and supporting documents.
- Accept complaints only from the registered player; claims cannot be transferred, sold, donated, etc., per LOK Article 1.3 section c.
- Allow free submission; request reasonable supporting documents if needed.
- Inform players of ADR options and that they do not restrict legal rights (unless agreed in ADR terms).
- Clarify in Terms and Conditions that CGA handles license breaches or malpractice, not individual resolutions.

5. Complaint Resolution Process

The Company shall implement a resolution process:

- **Acknowledgment:** For responsible gaming complaints, confirm receipt in writing within 2 business days, explaining the process and average timeline. For other complaints, within 1 week.
- **Investigation:** Assess fairly using evidence; AI may assist for non-complex cases, but human oversight is required for responsible gaming or intricate issues.
- **Timelines:**

- **Responsible Gaming Complaints:** Resolve within 5 business days using best efforts; extendable up to 2 weeks with notice, and a further 2 weeks if due to player delay.
- **Other Complaints:** Resolve within 4 weeks; extendable once by 4 weeks with prior written notice if complex or information is lacking.
- **Final Response:** Always in writing, including reasoned outcome, evidence (if applicable), reasons for rejection (e.g., if information not provided within initial period), and ADR escalation details if unsatisfied.
- **Escalation:** If unresolved, the complaint becomes a dispute and can be escalated to ADR.

6. Alternative Dispute Resolution (ADR)

The Company shall:

- Offer free, independent ADR services.
- Contract with at least one CGA-certified ADR provider; upload agreement to CGA Portal within 1 month of certified providers' publication.
- Bear all ADR costs; players escalate at no charge.
- Include full ADR details in Terms and Conditions: contacts, process, binding nature (if applicable), and impact on legal rights.
- Prevent ADR recommencement with another provider once completed; disputes cannot resurface if player drops out.
- Set reasonable parameters to prevent abuse (e.g., minimum claim value for low-stakes issues, but not for serious matters like self-exclusion), seeking legal advice for compliance.

7. Record-Keeping and Reporting

- **Record-Keeping:** Retain records of complaints, resolutions, ADR escalations, and legal proceedings for at least 5 years or as required by data protection laws. CGA may access records anytime.
- **Reporting:** Submit biannual reports to CGA, summarizing total complaints, by category, settled (upheld/rejected), pending, ADR referrals, and legal actions.

8. Policy Review and Enforcement

- This Policy shall be reviewed annually or following material changes in operations, technology, or regulations.
- Enforcement mechanisms include monitoring, investigations, and sanctions for violations.
- The Policy is effective as of 10/11/2025 and applies to all relevant parties.

Approval

Approved by:

Date: