
Novi B.V. Player Complaints Policy

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1. Introduction

This Player Complaints Policy outlines the procedures for handling complaints in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority (CGA)'s Complaints Policy Guidelines. We are committed to providing a transparent, fair, and efficient process for resolving player complaints, including access to free Alternative Dispute Resolution (ADR) services.

This policy applies to all players engaging with our services under a CGA license.

2. Complaint Submission process

2.1 Who May Submit a Complaint

Complaints can only be submitted by registered account holders. Third-party complaints are not accepted.

2.2 Complaint Submission Window

Complaints must be submitted within six (6) months from the date of:

- Settlement of the bet or game result; or
- The incident giving rise to the complaint.

In cases involving live bets, players are advised to act promptly as related data may not be preserved for extended periods.

2.3 Submission Process

Players may initially contact our Customer Support team via email or live chat for various matters related to their accounts.

To file an official complaint, however, players must complete and submit the Complaint Submission Form.

The form is available in English and in the language of the domain used by the player.

2.4 Required Information

The Complaint Submission Form must include:

- Full name, residential address, and country of residence
- Username
- Date of complaint and date of the event in question
- Description of the issue (with a selection of pre-defined categories where applicable)

We may request additional documents reasonably required to process the complaint.

3. Complaint Resolution Stages

3.1 Internal Resolution

Upon receiving a formal complaint, we have to outline the process and expected resolution time while also acknowledging receipt within:

- 2 business days for responsible gaming-related complaints
- 7 days for all other complaints

We will provide a final response in writing that includes:

- A reasoned outcome supported by evidence, or
- An explanation of why the complaint was not handled, or
- Notice of escalation options to ADR (if the player is not satisfied)

3.2 Resolution Timelines

Responsible Gaming Complaints: Must be resolved within 5 business days, with a maximum delay of 2 weeks, extendable by another 2 weeks if awaiting player response.

All Other Complaints: Must be resolved within 4 weeks, extendable once by another 4 weeks if complexity requires.

4. Escalation to Alternative Dispute Resolution (ADR)

If a complaint is not resolved to the player's satisfaction, the player may escalate the matter to an independent CGA-Certified ADR provider. This service is provided free of charge, and all costs are covered by us.

The ADR decision is final for the ADR process. Once concluded:

- The dispute may not be reopened with another ADR provider
- If a player exits the ADR process mid-way, the complaint will be considered closed

We will not restrict the player's right to pursue legal action unless explicitly agreed as part of the ADR procedure.

5. Role of the Curacao Gaming Authority (CGA)

The CGA does not resolve individual complaints

Players may contact the CGA regarding license breaches, malpractice, or regulatory violations

The CGA may use complaint information in its supervisory role

We should not restrict any player from contacting the CGA.

6. Record-Keeping and Reporting

We are required to:

- Submit complaint reports to the CGA by January 15 and June 15 each year (starting January 2026), covering:
 - Total complaints
 - Outcomes (resolved/rejected)
 - Pending cases
 - Category breakdown
 - ADR referrals
 - Legal escalations
- Retain complaint records (including unresolved/ADR/legal) for up to five (5) years, subject to data protection laws

7. Complaints Policy for the Players

This Complaints Policy must be:

- Clearly displayed on our website
- Included in the Terms and Conditions, along with:
 - Contact details for support
 - Complaint process and form links
 - Timelines for responses
 - Player rights (including ADR and CGA contact)
 - Information on how ADR outcomes may affect further legal options

8. Grounds for Complaint

Players may submit a complaint about any aspect of their interaction with us, including but not limited to:

Deposits or withdrawals

Bonus terms

Account closures/restrictions

Game outcomes or fairness

Responsible gambling issues

Account verification (KYC)

Data privacy concerns

Technical malfunctions

AML or fraud issues

Regulatory or licensing matters

Terms and conditions