

Player Complaints and Dispute Resolution Policy

1. Policy Overview, Scope, and Definitions

1.1. Purpose and Scope

This policy outlines the clear, fair, and transparent process for the submission and resolution of player complaints and disputes, in full compliance with the mandates of the Curaçao Gaming Authority (CGA), particularly the requirements under the National Ordinance on Games of Chance (LOK) for dispute resolution.

This procedure applies to all registered players of Superstars Entertainment B.V. and covers grievances related to gaming outcomes, financial transactions (deposits/withdrawals), service quality, or responsible gambling measures.

1.2. Key Definitions

- Complaint: A written expression of dissatisfaction by a player related to the operator's services, decisions, or conduct, indicating the player is unhappy and expects a response or resolution.
- Dispute: A Complaint that has not been resolved to the player's satisfaction through the operator's internal complaints process.
- Alternative Dispute Resolution (ADR) Provider: An independent, CGA-certified third-party entity authorized to resolve Disputes between the player and the operator.

2. Complaint Submission Procedure (Internal Stage)

2.1. Method of Submission

Players wishing to lodge a Complaint must do so in writing via the official channel designated for this purpose:

- Official Form: Use the dedicated Complaint Submission Form available on the website in English and the local language.
- Email: Send a detailed email to: legal@superstars-entertainment.com

2.2. Required Information

A valid Complaint must contain the following minimum information:

- Player's full name, registered address, and account number.
- Contact details (phone and email).
- A clear, detailed description of the event or issue causing the Complaint.
- The date and time of the incident (if applicable).
- The desired resolution sought by the player.

2.3. Time Limit for Submission

Complaints must be submitted to the operator within a maximum period of six (6) months from the date the disputed bet or incident occurred. Complaints received after this period may be rejected.

2.4. Acknowledgment

The operator will acknowledge receipt of the Complaint in writing (via email) within three (3) business days of submission.

3. Internal Review and Resolution

3.1. Internal Investigation

The Compliance and/or Customer Support Team will conduct a thorough and impartial investigation, reviewing all relevant data, game logs, and system records.

- AI may be used to assist with the categorization and initial triage of straightforward complaints.
- Any Complaint related to Responsible Gambling (e.g., self-exclusion breaches, vulnerability protection) or classified as complex must be reviewed and handled by human staff.

3.2. Response Timeframes

The operator is committed to resolving Complaints within the mandatory timeframes set by the CGA:

- Responsible Gambling Complaints: The final resolution or decision must be provided to the player within five (5) business days of receiving the Complaint.
- All Other Complaints/Disputes: The final resolution or decision must be provided to the player within four (4) weeks (28 days) of receiving the Complaint.

3.3. Extension of Time

In complex cases, the operator may extend the resolution period once by an additional four (4) weeks. If an extension is required, the player must be notified in writing before the expiry of the initial four-week period, explaining the reasons for the delay and providing the new expected resolution date.

4. Alternative Dispute Resolution (ADR) Escalation

4.1. Escalation Triggers

If a player is dissatisfied with the final resolution provided by Superstars Entertainment B.V. after the internal process is complete (or if the resolution deadlines are not met), the player may escalate the matter to an independent ADR Provider. The complaint is formally recognized as a Dispute upon referral to the ADR Provider.

4.3. CGA Oversight

While the CGA does not typically intervene in individual transactional disputes, it maintains oversight of the process. Players may contact the CGA directly if they believe the operator is violating license conditions, engaging in fraud, or failing to comply with this Complaints Policy.

5. Record Keeping and Reporting

5.1. Record Retention

The operator must maintain comprehensive and accurate records of all Complaints, Disputes, and the outcomes of their resolution for a minimum period of five (5) years.

5.2. Regulatory Reporting

The CISO or designated Compliance Officer shall submit bi-annual reports to the CGA detailing the following:

- The total volume of Complaints received.
- Categorization of Complaints (e.g., withdrawal, game fairness, responsible gaming).
- The outcomes of all resolved Complaints.
- The number of Complaints escalated to the certified ADR Provider.