

130Group N.V.

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Player Complaints Policy

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1. Objective

To establish a structured, transparent, and fair framework for managing player complaints.

To ensure the timely resolution of complaints related to gameplay, transactions, account security, or customer support.

To uphold regulatory obligations under the CGA framework and promote ethical practice standards in the online gambling industry.

Other important objectives:

- **Fairness:**
Ensure all player complaints are treated **impartially**.
- **Transparency:**
Ensure players understand **how to file a complaint**, what to expect during the process, and how decisions are made.
- **Efficiency:**
Resolve complaints **promptly** and **effectively**, minimizing inconvenience for players.
- **Accountability:**
Hold the operator responsible for addressing and rectifying issues raised by players.
- **Compliance:**
Meet the **regulatory and licensing requirements** applicable to dispute resolution .
- **Player Protection :**
Safeguard players' rights and ensure they are treated with **respect and integrity**.
- **Continuous Improvement:**
Use complaint feedback to **improve services, internal policies, and the overall player experience**.

This policy applies to all registered players submitting complaints related to:

- Game fairness, odds, or RTP (Return to Player) issues
- Payment process
- Account verification, KYC (Know Your Customer), or AML (Anti-Money Laundering) concerns
- Customer service interactions
- Bonus, promotion, or loyalty program matters

This policy excludes matters beyond the company's reasonable control, such as third-party payment processors or network outages, unless they directly affect the player's experience.

2. Introduction

130GROUP N.V. is committed to providing a fair, transparent, and responsible gaming environment for all players. The company recognizes that, on occasion, a player may feel dissatisfied with certain aspects of the services provided.

This Player Complaints Policy outlines the procedures through which players may submit complaints, how such complaints are investigated, and the steps taken to ensure that all matters are resolved fairly, consistently, and within reasonable timeframes.

The company's objective is to maintain player confidence by ensuring that every concern is treated seriously, handled professionally, and resolved in accordance with applicable regulatory requirements and industry best practices.

Through this policy, **130GROUP N.V.** aims to:

- Provide a clear and accessible procedure for submitting complaints.
- Ensure impartial review and fair resolution of all issues.
- Protect player rights and promote trust in our operations.
- Use feedback derived from complaints to continuously improve services.

3. Complaint and Dispute Resolution

Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint, via the customer support service.

The dispute management team reviews complaints within a specified timeframe, and resolutions are communicated within **ten (10) days** of receipt. Where necessary, due to complexity or incomplete information, this period may be extended once by up to an additional **four (4) weeks**, by providing a written notice to the player.

All disputes involving financial transactions are documented.

Unresolved disputes may be escalated to the Compliance Officer or, where applicable, referred to the Curaçao Gaming Authority (CGA).

Players may submit complaints through the following channels:

- Support email (support@[casino].com), including a detailed description and relevant documentation
- Live chat support (available during operational hours) for initial assistance

Each complaint must include clear and unequivocal information identifying the player and detailing the issue, including:

- Account username and/or account details
- Full name as registered on the account
- Submission from the registered email address
- Email subject line clearly stating the complaint reason
- A detailed description of the complaint or disputed conduct
- Relevant dates and times
- Transaction details (deposits, winnings, withdrawals)
- Account opening or closure dates (if applicable)

Information must be available in English and in the language of the website or domain used by the player.

The Casino may request reasonable supporting documentation as part of the complaint investigation process.

The validity of a complaint is assessed based on the following criteria:

- **Terms and Conditions:**
Whether the player complied with applicable Terms and Conditions.
- **Regulatory & Licensing Compliance:**
Whether responsible gambling obligations, including self-exclusion measures, were properly applied.
- **Evidence, Transparency & System Errors:**
Whether the issue resulted from a technical or system-related error.
- **KYC & Payments:**
Whether accurate and truthful information was provided during registration and verification.
- **Bonuses:**
Whether funds were voided due to a breach of bonus Terms and Conditions by the player.
- **Gameplay Disputes:**
Whether the complaint relates solely to game outcomes or misunderstandings of gameplay mechanics.

Supporting documentation may include, but is not limited to:

- Deposit and withdrawal records, betting history, and correspondence;
- Communications;
- Player account details, balance history, and transaction logs;
- Identification documents and KYC verification reports (where applicable);
- Any additional documentation relevant to the case.

4. Acknowledgment & Record Keeping

Complaints are acknowledged within **two (2) days** of receipt, or within a specific timeframe communicated to the player where delays occur.

All complaints, correspondence, and investigation records are securely stored within internal systems.

Records are retained for an appropriate period, assessed on a case-by-case basis, in compliance with AML, KYC, and data protection regulations.

5. Investigation, Escalation & Resolution Timeline

Initial investigations are generally completed within **ten (10) days** of receipt.

More complex matters, including payout disputes or account suspensions, may require extended investigation periods.

Players may receive interim updates during the investigation process.

Where additional time is required, the player will be informed in writing, together with a revised estimated resolution timeframe and the reasons for the delay.

Resolutions include clear explanations and, where applicable, corrective actions.

6. Dispute Escalation & Final Determination

Complaints may be escalated to the Complaints Department by dedicated email address.

The final decision, based on internal investigation and compliance review, is communicated in writing and includes a reasoned assessment of the outcome, supported by evidence where applicable.

7. External Dispute Resolution & Regulatory Compliance

If a player remains dissatisfied following the internal complaints process, the dispute may be escalated to an independent third party, such as an Alternative Dispute Resolution (ADR) provider, subject to applicable requirements.

The company aims to fully cooperate with regulatory authorities and provides necessary documentation whenever required, in accordance with applicable regulations.

In line with Article 5.3 of the LOK, the Player Complaints Policy is made publicly available.

Players may be required to explicitly confirm acceptance of this policy via email correspondence or as part of the registration and Terms & Conditions acceptance process.

For compliance purposes, details of the ADR process may be included in the Casino's Terms and Conditions. ADR services are provided free of charge to the player.

8. Confidentiality & Data Protection

All complaint-related data is securely stored using appropriate encryption and security measures.

Access is restricted to authorized personnel involved in complaint handling, compliance, and auditing functions.

Employees are bound by confidentiality obligations to protect player data and uphold applicable privacy standards.

9. Fair Treatment & Non-Retaliation

Players are encouraged to submit complaints without fear of retaliation or penalty.

The company commits to a neutral, unbiased investigation process.

Staff receive training on the ethical handling of sensitive issues, including fair treatment and non-retaliation principles.

10. Communication & Transparency

Final resolutions are communicated clearly through the appropriate contact channel, including detailed explanations of findings and any remedial actions taken.

Proactive communication is maintained throughout the complaint lifecycle to ensure players remain informed and respected.

All communications are professional, courteous, and consistent with gambling industry standards.

11. Policy Review & Stakeholder Engagement

This policy is reviewed annually or whenever deemed necessary to reflect regulatory updates, industry best practices, and stakeholder feedback, ensuring continued player protection.

Any revisions are communicated internally through training updates and made publicly available on the website.

This policy aligns with the Player Complaints Policy Guideline issued by the CGA and applicable data protection regulations.