
Complaints Policy & Procedure

Owner	Author	Board Approval	Review Date	Next review date	Version	Comment
Compliance Officer	Daniel Tatar				V1.0	New Document
Compliance Officer	LNS	15/04/2026	10/04/2026	10/4/2027	V2.0	New template used Wording tidied up

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1. Introduction/background

1.1. This policy is designed to establish the procedure that Dynamic Marketing B.V follows to manage complaints and disputes to ensure they are handled fairly, transparently and efficiently under the legal requirements of Curacao.

1.2. As a licensed entity under the laws of Curacao, the Company is committed to maintaining high standards of player protection, responsible gaming and regulatory compliance and this policy outlines the framework for managing player complaints and disputes in accordance with Article 5.3 of the National Ordinance for Games of Chance (LOK) and relevant guidance issued by the Curacao Gaming Authority (CGA).

1.3. This policy ensures that:

- Players have access to a clear and accessible complaints procedure
- Complaints are investigated impartially
- Complaints are handled within defined regulatory timeframes
- A written response and reasoned decision are provided to the player
- Players have access to alternative dispute resolution mechanisms
- Proper records are maintained for regulatory compliance and oversight.

1.4. Compliance with this policy is mandatory for all employees.

2. Scope

2.1. This policy applies to all complaints submitted by players concerning services provided by the Company, including but not limited to:

- Account registration or verification
- Deposits or withdrawals
- Bonus terms or promotional offers
- Betting or game outcomes
- Technical malfunctions
- Customer service conduct
- Responsible gaming measures
- Suspension or restriction of player accounts

3. Definition of a complaint

3.1. For the purposes of this policy, a complaint is defined as:

Any expression of dissatisfaction submitted by a player relating to the services provided by the Company, where the player expects a response or resolution.

3.2. Routine support inquiries or requests for clarification are not considered complaints unless dissatisfaction is explicitly expressed.

4. Complaint submission and process to resolution

4.1. Submission of the complaint.

4.1.1. Players may submit a complain free of charge within (6) six months after the incident relating to their participation in a game of chance.

4.1.2. For fixed-odds betting, the six-month period begins from the end of the relevant event.

4.1.3. Complaints must be submitted using the complaints form, downloadable from the website online or via email. All required information must be included on the form such as:

- ✓ Complainant's name
- ✓ Address and place of residence
- ✓ Account username or account number
- ✓ Description of the conduct or incident the complaint is about
- ✓ Any supporting information or evidence related to the complaint.

4.1.4. Complaints must be submitted in English, Dutch or Papiamentu

4.2. **Acknowledgement of the complaint.** The Company will acknowledge receipt of the complaint within a week of receiving it by sending a written communication to the complainant.

4.2.1. The acknowledgement will include:

- ✓ Confirmation that the complaint has been received
- ✓ A complaint reference number
- ✓ Information regarding the complaint handling procedure
- ✓ The expected timeline for investigation and resolution.

4.3. **Complaint investigation process.** Upon receipt of a complaint, the Company will conduct an internal investigation to determine the facts and circumstances of the issue. The investigation may involve:

- Reviewing player account records
- Checking financial transactions
- Reviewing betting or game logs
- Consulting relevant game providers
- Revising applicable Terms and Conditions
- Evaluating internal procedures and staff conduct

4.4. Complaint resolution. Within four weeks of receiving the complaint, the Company will notify the complainant in writing of the outcome. The notification will include one of the following:

4.4.1. Decision not to process the complaint. If the Company determines that the complaint cannot be processed, the complainant will receive written notification explaining:

- The decision not to process the complaint
- The reasons for this decision

4.4.2. Final decision on the complaint. If the complaint is processed, the Company will issue a final written ruling, including:

- The outcome of the investigation
- The rationale supporting the decision
- Any corrective measures taken, if applicable

4.5. Extension of investigating period. Where necessary, due to the complexity of the complaint, the Company may extend the investigation period once for an additional 4 weeks. The complainant will be informed in writing of:

- The reason for the extension
- The revised expected resolution timeframe

5. Responsible Gaming Complaints

5.1. Complaints related to responsible gaming or player protection will be treated as high priority.

5.2. The Company will make every reasonable effort to review and respond to such complaints within 1 business day, where possible.

5.3. Where further investigation is required, the player will be informed of the expected timeline for resolution but always aligned to the regulatory requirements.

6. Internal Escalation Procedure

6.1. If the player is dissatisfied with the outcome of the complaint, they may request an internal escalation review within 14 days of receiving the final decision. The escalation review will be conducted by either:

- The Compliance Officer, or
- Senior Management

6.2. The review ensures that the complaint has been handled fairly and in accordance with the Company's policies and regulatory obligations.

7. Alternative Dispute Resolution (ADR)

7.1. Players will have access to Alternative Dispute Resolution (ADR) mechanisms at any time during or after the complaints process. This must be a CGA-certified provider.

7.2. ADR provides an independent review of disputes by a neutral third party.

7.3. In accordance with regulatory requirements:

- ADR services will be made available at the expense of the Company
- The Company will cooperate fully with ADR provider
- Players will receive clear instructions on how to access ADR services

8. Complaints Register and Record keeping

8.1. The Company will maintain complaints register containing detailed records of all complaints received. The register will include:

- Complaint reference number
- Player account details
- Date complaint was received
- Date of acknowledgement
- Nature of the complaint
- Actions taken during investigation
- Outcome and decision
- Date of resolution

8.2 Complaints records will be securely retained for the minimum period required by the Curacao Authorities.

8.3. Records may be provided to the Curacao Gaming Authority or other competent authorities upon request, as well as auditors (internal and external).

9. Responsibility and Oversight

9.1. Responsibility for implementing this policy rests with the Company's Board of Directors.

9.2. Oversight and monitoring of compliance with this policy are the responsibility of the Compliance Officer.

9.3. All relevant staff members must be trained in the proper handling of complaints and must follow the procedures outlined in this policy.

10. Review and Monitoring

10.1. This policy is a living document designed to evolve alongside the business operations, regulatory environment and risk profile. While the fundamental principles will remain constant, periodic reviews are required to ensure alignment with legislation, regulation, business processes and risk appetite. This policy will be formally reviewed at least annually, or earlier if material changes occur in applicable regulations, internal controls or identified risks.

10.2. Any updates or amendments will be documented, version controlled and communicated promptly to all relevant staff.

10.3. The latest approved version of this policy is available to all staff via the company's SharePoint site and it is the responsibility of each staff member to familiarise themselves with the most current version.

10.4. Evidence of review and Board approval (where required) will be retained to support ongoing oversight and demonstrate compliance with governance requirements.