



## ***Player Complaints Policy***

**NEXUS INTERNATIONAL ENTERTAINMENT  
N.V.**

**Approved by the Board of Directors**

**July 2025**

**Confidential**

**Signature**

07/23/2025





Morganite Corporate Services B.V.  
Managing Director

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## 1. PURPOSE AND BUSINESS DESCRIPTION

Nexus International Entertainment N.V. is a Curacao-based legal entity which currently runs the following websites: [www.luckypari.com](http://www.luckypari.com)

Nexus International Entertainment N.V registered No. 162180 at Abraham de Veerstraat 1, Willemstad, Curaçao under an application, OGL/2024/1324/0750, for a license under the Curaçao Gaming Control Board. Certificate of Operation is subject to the National Ordinance on Offshore Games of Hazard (Landsverordening buitengaats hazardspelen, P.B. 1993, no. 63) (NOOGH).

The primary purpose of this complaints policy is to ensure that all players have access to a transparent, impartial, and efficient process for resolving complaints. Nexus International Entertainment N.V is committed to addressing player concerns promptly and fairly. Furthermore, the policy ensures players have the right to escalate any unresolved disputes to independent and cost-free alternative dispute resolution (ADR) providers, fully aligned with the regulatory standards established by the jurisdiction of Curaçao.

This policy is binding on all players from the moment they register an account and begin utilizing the gaming services provided by Nexus International Entertainment N.V. By explicitly accepting the policy during registration (whether via checkbox, pop-up confirmation, or other acceptance mechanisms) or by continuing to use the services offered under Nexus International Entertainment N.V.'s license, players are considered to have agreed to its terms.

The provisions contained within this policy are designed to operate alongside, and not to replace or diminish, any applicable obligations arising from private law, including, but not limited to, the provisions set forth in Book 6 of the Civil Code of Curaçao relating to general terms and conditions. Nothing in this policy shall limit or affect any rights players hold under applicable civil law.

## 2.COMPLAINTS SUBMISSION GUIDELINES

### 2.1 COMPLAINT TIMEFRAME

Players may submit a Complaint within six (6) calendar months of the settlement of a bet, the occurrence of the relevant incident, or the conclusion of the gaming event to which the Complaint relates. This six-month period applies uniformly across all gaming activities offered by the company, including but not limited to peer-to-peer games such as poker, ante-post fixed odds betting, and in-running sports betting.

For in-running betting markets, where outcomes depend on rapidly changing data, Players are encouraged to submit Complaints promptly. This guidance reflects the reality that certain data points are temporary in nature and may not be retained indefinitely. The company cannot reasonably be expected to preserve such transient data beyond its standard data retention policies.

### 2.3 SUBMITTING AN OFFICIAL COMPLAINT

To ensure fairness and consistency, all Complaints must be submitted personally by the registered Player using the official Complaint Submission Form provided by Nexus International Entertainment N.V. This form is available through the following channels:

As a downloadable PDF or Word document on the company's website, which can be completed and sent via email.

As an interactive online form accessible and submittable directly through the Player's account dashboard.

The Complaint Submission Form requires, at a minimum, the following details:

Full name, residential address, and Player account ID (if applicable).

The date of the Complaint and the date of the event or decision that led to the Complaint.

A detailed description of the issue, with supporting documentation or evidence where possible.

Selection of the relevant Complaint category from a predefined list (e.g., deposit issues, withdrawal issues, technical failures, Responsible Gaming concerns).

Players may be requested to provide additional information or documentation reasonably necessary to allow Nexus International Entertainment N.V. to conduct a thorough and impartial investigation. Any such requests will be reasonable and proportionate to the nature and complexity of the Complaint.

## **2.4 OVERSIGHT ROLE OF THE CURAÇAO GAMING CONTROL BOARD (GCB)**

Players should be aware that the Curaçao Gaming Control Board (GCB) does not intervene in individual disputes between Players and licensed operators. The GSB's role is supervisory, utilizing aggregated Complaint data to monitor compliance and support its regulatory oversight functions.

However, Players retain the right to report concerns directly to the CGA in instances where they believe Nexus International Entertainment N.V. has engaged in regulatory breaches, malpractice, or violations of licensing conditions. The company must not impose any restrictions on a Player's ability to contact the CGA for these purposes.

# **3.COMPLAINT HANDLING PROCEDURE**

## **3.1 HOW NEXUS PRIORITIZES YOUR COMPLAINT**

Nexus International Entertainment N.V. treats every complaint with the utmost seriousness. Once your complaint is received, it is carefully logged and reviewed to determine the appropriate priority level.

Complaints related to Responsible Gaming—such as issues involving self-exclusion or the safeguarding of vulnerable players—are given the highest priority as your well-being is paramount to us. Our target is to resolve such matters within five (5) business days. In exceptional circumstances, where the issue proves particularly complex, we may require up to an additional two (2) weeks to provide a thorough and well-considered response.

For all other types of complaints, we process them in the order they are received. Our goal is to resolve these within four (4) weeks, although especially complex cases may require up to eight (8) weeks for full resolution.

## **3.2 PROMPT CONFIRMATION OF YOUR COMPLAINT**

Upon receipt of your complaint, Nexus International Entertainment N.V. will acknowledge it within the following timeframes:

- Within **2 calendar days** for Responsible Gaming matters
- Within **7 calendar days** for all other categories of complaints

Our acknowledgment will include:

- Confirmation of receipt along with a unique case reference number
- An outline of the steps involved during the investigation
- An estimated timeline for resolution, with transparency on any potential extensions

### **3.3 OUR COMPLAINT INVESTIGATION AND RESOLUTION PROCESS**

We handle each complaint with care, diligence, and fairness. Our process typically includes:

- A comprehensive review of your account, transactional history, system activity, and all related communications
- Collaboration with relevant internal departments, including Customer Support, Compliance, and Technical Operations
- Direct communication with you if any additional information is required to ensure a complete and fair resolution

Our dedicated and trained complaint handlers ensure all investigations are conducted transparently and impartially. Once your case is resolved, you will receive:

- A clear and written explanation of our findings
- Any supporting evidence, where applicable
- Guidance on how to escalate the matter to an independent Alternative Dispute Resolution (ADR) service if you remain unsatisfied
- Contact details of the relevant ADR providers

### **3.4 OUR USE OF AI IN THE COMPLAINTS PROCESS — WITH HUMAN OVERSIGHT**

Nexus International Entertainment N.V. utilizes artificial intelligence (AI) tools to support certain elements of the complaints process, such as case sorting and pattern identification. However, all critical decisions are subject to human oversight. Human review is mandatory in the following instances:

- All Responsible Gaming-related complaints
- Any complex cases or those involving sensitive personal data

Any decisions assisted by AI undergo review to ensure fairness, accuracy, and compliance with applicable regulations, safeguarding your rights at all times.

## 4. ALTERNATIVE DISPUTE RESOLUTION (ADR) — YOUR RIGHT TO INDEPENDENT REVIEW WITH NEXUS

### 4.1 YOUR ACCESS TO INDEPENDENT HELP

At Nexus International Entertainment N.V., we are committed to resolving every complaint fairly, promptly, and in accordance with our regulatory obligations. However, if you remain dissatisfied after we have completed our internal complaints process, you have the right to escalate your case to an independent Alternative Dispute Resolution (ADR) provider.

ADR services are provided entirely free of charge to you. Nexus International Entertainment N.V. covers all related costs to ensure players have unhindered access to an impartial, fair, and independent resolution process.

### 4.2 WHEN ADR IS THE FINAL STEP

Once your complaint has been reviewed and a decision issued by an ADR provider, this marks the conclusion of the ADR process. Neither you nor Nexus International Entertainment N.V. may submit the same issue to a different ADR provider.

However, please note that if the ADR decision is not legally binding under private law, you retain the right to pursue legal action through the courts, should you wish to do so.

### 4.3 MAINTAINING FAIRNESS IN THE ADR PROCESS

To ensure that the ADR process remains fair and is not misused, Nexus International Entertainment N.V. may apply reasonable conditions before referring cases — such as requiring a minimum claim value. These safeguards are designed to protect the integrity of the process and are always applied in accordance with applicable laws and under the supervision of our regulator.

## 5.RECORD-KEEPING

Nexus International Entertainment N.V. takes its regulatory responsibilities seriously. In line with Curaçao's gaming regulations, we maintain comprehensive, accurate, and securely stored records of all player complaints. These records include, but are not limited to:

- Copies of all submitted Complaint Forms, whether submitted online or via other methods
- Correspondence exchanged between you and our team throughout the complaints process
- Internal investigation reports and supporting documents such as account histories, transaction logs, and technical reports
- Records of referrals to ADR providers or any legal proceedings initiated by either party

We retain these records for a minimum of five (5) years from the date the complaint is fully resolved, unless a shorter retention period is required by data protection or other applicable laws. Our data retention practices fully comply with Curaçao's regulations and internationally recognized privacy standards.

## 6.REGULATORY REPORTING OBLIGATIONS

In addition to internal record-keeping, Nexus International Entertainment N.V. submits detailed reports to the Curaçao Gaming Control Board (GCB) twice annually, on January 15th and June 15th. These reports include:

- The total number of complaints received
- A breakdown of resolved complaints, specifying how many were resolved in favor of the player and how many were not upheld
- The number of complaints pending or unresolved
- Complaint categories (e.g., technical issues, payment delays, Responsible Gaming matters)
- The number of complaints escalated to ADR and the respective outcomes

- The number and nature of cases where players have initiated legal proceedings

The Curaçao Gaming Control Board reserves the right to review our complaint records at any time as part of its supervisory functions. Nexus International Entertainment N.V. is fully committed to cooperating with the GCB and will provide any requested information promptly and in accordance with the prescribed format.

## 7. TERMS AND CONDITIONS

This Complaints Policy forms an integral part of **Nexus International Entertainment N.V.'s** Terms and Conditions and is presented to players in a manner that is always clear, visible, and easy to access.

To ensure full transparency, Nexus International Entertainment N.V.:

- Publishes this policy as a standalone document with a clearly visible link on the homepage, registration page, and within the player account dashboard.
- Summarizes the complaints process within the Terms and Conditions, including direct links to the full policy for easy reference.
- Requires players to actively confirm that they have read and accepted this policy during registration, typically via a checkbox or pop-up, to ensure clear and informed consent.

The Terms and Conditions also clearly outline:

- How to submit a complaint and the expected timelines for resolution.
- Your right to escalate unresolved complaints to an independent ADR provider and, where applicable, to seek legal remedies.
- A clear statement that while the Curaçao Gaming Control Board (GCB) does not mediate individual disputes, it remains available for any concerns regarding potential regulatory non-compliance.

## 8. REASONS YOU MAY WISH TO SUBMIT A COMPLAINT

At Nexus International Entertainment N.V., we recognize there are various reasons you may wish to submit a formal complaint. Below are some common areas where issues may arise:

### 1. **Deposit Issues**

- Delays in processing deposits
- Deposits not appearing in your account
- Errors related to deposit transactions

### 2. **Withdrawal Issues**

- Unreasonable delays in processing withdrawals
- Rejected or blocked withdrawal requests
- Disputes over withdrawal eligibility

### 3. **Bonuses & Promotions**

- Disputes over bonus terms and conditions
- Concerns about the fairness of promotional offers
- Issues meeting wagering requirements

### 4. **Account Closures or Restrictions**

- Unexplained account suspensions or closures
- Unclear or unjustified account limitations

### 5. **Game Fairness**

- Suspected software malfunctions
- Disputes over game outcomes or results
- Concerns about fairness or transparency

### 6. **Responsible Gaming Protections**

- Failures to implement or respect self-exclusion requests
- Issues with cooling-off periods or player protection measures

### 7. **KYC & Verification**

- Concerns over identity checks or document requests
- Delays or disputes during the verification process

#### 8. **Data Privacy & Security**

- Handling of your personal data
- Concerns over data storage, processing, or misuse

#### 9. **Technical or Software Issues**

- Platform access problems
- Website or app malfunctions affecting your experience

#### 10. **Fraudulent Activities**

- Suspicion of fraudulent behavior by third parties
- Concerns about platform security or integrity

#### 11. **Underage Access**

- Reports of minors gaining unauthorized access to the platform

#### 12. **Licensing or Regulatory Concerns**

- Suspected breaches of licensing requirements
- Alleged violations of applicable regulations

## 9. GOVERNING LAW AND JURISDICTION

This policy is governed by and interpreted in accordance with the laws of **Curaçao**.

If any legal dispute arises from or relates to this policy and cannot be resolved through our internal complaints process or via Alternative Dispute Resolution (ADR), such matters will fall under the exclusive jurisdiction of the courts of **Curaçao**.

However, this does not affect any rights you may have under applicable laws to bring legal action in your country of residence where such rights are provided by law.

## 10. DEFINITIONS

- **Player:** Any individual who has successfully registered an account with **Nexus International Entertainment N.V.**, completed all required identity verification and due diligence procedures, and has participated in one or more gaming activities via the company's licensed platform.
- **Complaint:** Any written expression of dissatisfaction submitted by a player concerning the services, decisions, conduct, or terms of Nexus International Entertainment N.V., where the player seeks a response or corrective action.
- **Dispute:** A complaint that remains unresolved to the player's satisfaction after exhausting the internal complaint handling process and has subsequently been escalated either to an independent ADR provider or to a competent court of law.
- **Alternative Dispute Resolution (ADR):** A process carried out by an independent entity certified by the Curaçao Gaming Control Board, aimed at providing impartial review and resolution of unresolved complaints between players and Nexus International Entertainment N.V. ADR services are provided free of charge to the player, with all related costs covered by the operator.
- **Responsible Gaming Complaint:** Any issue raised by a player concerning the enforcement or effectiveness of responsible gambling measures, such as the availability and timely implementation of self-exclusion or cooling-off periods, or any alleged failure to protect vulnerable individuals as outlined in the company's Responsible Gaming Policy.
- **Technical Issue:** Any malfunction, outage, or defect within the software, hardware, or systems operated by Nexus International Entertainment N.V. that affects a player's ability to participate in gaming activities via the website, mobile application, or other supported platforms.
- **Fraudulent Activity:** Any act or omission carried out with the intent to deceive, defraud, or gain an unfair advantage. This includes, but is not limited to, account takeovers, the use of automated tools or bots, bonus abuse, or submission of falsified identification documents.
- **Complaint Handler:** The designated employee(s) or team within Nexus International Entertainment N.V. responsible for receiving, investigating, and resolving player complaints in accordance with this policy. All complaint handlers are trained to meet applicable regulatory standards and are required to act impartially.

## 11. CONTACT INFORMATION

**CONTACT INFORMATION** section rephrased and fully adapted for **Nexus International Entertainment N.V.**:

If you need to reach **Nexus International Entertainment N.V.** regarding a complaint, you may do so through any of the following channels:

### **General Enquiries**

[support-en@luckypari.com](mailto:support-en@luckypari.com)

### **Complaints**

[complaints@luckypari.com](mailto:complaints@luckypari.com)

### **Live Chat Support**

Available 24/7 directly on our website.

### **Submit a Complaint Online**

Access our official Complaint Submission Form here:

<https://luckypari.com/>

### **Alternative Dispute Resolution (ADR) Contact Details**

Information on ADR services can be found at:

<https://luckypari.com/>

### **Curaçao Gaming Control Board**

Visit the CGCB's official website:

<https://www.gamingcontrolcuracao.org/>