

Player Complaints Policy for Black Hawk Technology B.V.

Key Information

Approving Official(s): Black Hawk Technology B.V. Senior Management

Responsible Office: Black Hawk Technology B.V. Compliance Department

Effective Date: 28th July 2025

Next Review Date: 28th July 2026

1. Policy Statement

At Black Hawk Technology B.V., we are committed to providing a fair, transparent, and efficient process for managing player complaints and disputes. This policy outlines our procedures for addressing players' concerns in accordance with the Curaçao Gaming Authority (CGA) Player Complaints Policy Guidelines and the National Ordinance on Games of Chance (LOK).

2. Purpose

The policy is drafted to inform players about:

- How they can submit complaints.
- The process and timelines for complaint resolution.
- Their rights, including escalation to Alternative Dispute Resolution (ADR) services.
- The role of the Curaçao Gaming Authority (CGA).
- The types of issues they can complain about.
- Contact information for support.

3. Audience

The intended audience of this Player Complaints Policy is primarily the registered players of the BK8 International online gaming platform.

4. How to Make a Complaint

We encourage you to contact our customer support team in the first instance for any general inquiries or feedback. If you have a formal complaint, please follow these steps:

- **Eligibility:** Only the registered player may make a complaint.
- **Complaint Window:** You may lodge a complaint free of charge at any time up to six months from the settlement of the bet or the incident about which you are complaining. For P2P or ante-post fixed odds betting, this period begins after the bet settlement or conclusion of the specific event. For in-running sports betting, prompt action is advised as data may not be available after a short period.
- **Submission Method:** An official Complaint Submission Form is available for your use. You can access this form either as a downloadable document to be completed and emailed/uploaded, or as an online form for direct submission.
- **Required Information:** The Complaint Submission Form must include, at a minimum:
 - Your name, address, and place of residence.
 - Your account number or username (if applicable).
 - The date of the complaint and the date of the disputed event.
 - A clear description of the conduct being disputed.
- **Language:** The form is available in English only.

- **Supporting Documentation:** You may be requested to provide reasonable supporting documentation relevant to your complaint.

5. Complaint Resolution Process

Upon receiving your complaint, we will follow these procedures:

- **Acknowledgement:**
 - **Responsible Gaming Complaints:** Within two business days, we will confirm receipt, explain the processing steps, and provide an average timeline for resolution.
 - **All Other Complaint Types:** Within one week, we will confirm receipt, explain the processing steps, and provide an average timeline for resolution.
- **Timelines for Resolution:**
 - **Responsible Gaming Complaints:** We will use our best efforts to resolve these cases within five business days. If more time is needed (up to two additional weeks), we will inform you of the delay. Delays due to a lack of response from you may extend this period by a further two weeks.
 - **All Other Complaint Types:** We will assess and respond to complaints within four weeks. If necessary due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to you.
- **Final Determination:** You will always receive a final determination of your complaint in writing. This response will include either:
 - A reasoned final assessment of the outcome/resolution with supporting evidence.
 - Detailed reasons for not handling the complaint (e.g., if requested information was not provided within the initial four-week period).
- **Use of AI:** While AI may be used in initial complaint handling, complex complaints and all responsible gaming complaints will be handled by a human. Our AI records are monitored to ensure reasonable and consistent solutions.

6. Alternative Dispute Resolution (ADR)

If you are unsatisfied with the resolution of your complaint through our internal process, you have the right to escalate the matter to an independent Alternative Dispute Resolution (ADR) entity, free of charge.

- **ADR Provider:** We shall have an agreement with at least one CGA Certified ADR entity. You can find their contact information and full details of the ADR process on a dedicated ADR page.
- **Costs:** Black Hawk Technology B.V. will bear all costs of the ADR process.
- **Finality:** Once the ADR process is completed, it cannot be recommenced with another ADR entity. If you withdraw from the ADR process, you may not have the right to resurface the dispute in the future.
- **Legal Action:** Our ADR process does not restrict your right to take legal action, except if mutually agreed under specific terms of ADR.

7. Role of the Curaçao Gaming Authority (CGA)

It is important to understand the CGA's role:

- The CGA does not resolve or make decisions on individual player complaints regarding gambling-related transactions on our website(s).
- The CGA will not review or overturn decisions made by us or the ADR provider unless deemed inadequately handled.
- You are not restricted from contacting the CGA directly regarding matters such as malpractice, breach of license conditions, or whistleblowing. While the CGA does not mediate individual disputes, it uses this information to support its supervisory and enforcement actions.

8. Reasons for Complaint

You have the right to make a complaint regarding any part of your relationship Black Hawk Technology B.V. or any incident related to your participation in a game of chance. This includes (but is not limited to) issues concerning:

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues
- Treatment of player balances
- KYC and Verification
- Data Protection
- Technical or Software issues
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation
- Unfair terms and conditions

9. Contact Information

For general inquiries or to initiate a complaint, please visit our "Contact Us" page on the website. There you will find the most up-to-date information on how to reach our customer service team, including details on email, live chat, and our official Complaint Submission Form.

This policy is subject to our Terms and Conditions, where further details regarding our complaint and dispute resolution procedures are outlined.