



Player Complaints Policy

Operated by Misterio Vacio B.V. | Authorisation under assessment by the Curaçao Gaming Authority (CGA), licence reference OGL/2024/1334/1038

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1. Our Commitment

At PuntPal, we are committed to delivering a safe, fair, and transparent gaming environment for all our players. We understand that, occasionally, disputes may arise. This policy explains how we handle player complaints, the standards we hold ourselves to, and the steps you can take to have any issue resolved efficiently and fairly.

This policy is published in accordance with the requirements of the Curaçao Gaming Authority (CGA) and the Player Complaints Policy Guidelines issued under the Landsverordening op de kansspelen (LOK).

2. Your Right to Make a Complaint

You may lodge a complaint with us free of charge at any time up to six (6) months from the settlement of the bet, or from the incident, about which you are making a complaint.

Where the complaint concerns peer-to-peer products (such as poker) or ante-post fixed-odds betting, the six-month period begins after the settlement of the bet or the conclusion of the specific event, rather than from the placement of the wager.

Where the complaint concerns in-running (live) sports betting, you may still submit your complaint within six months; however, please be aware that prompt action may be necessary. This is because an investigation may depend on data specific to your complaint that, due to the nature of in-running betting, may only be available for a limited period.

A complaint may only be made by the registered account holder. We are unable to accept or process complaints submitted by third parties on a player's behalf.

2.1 What you can complain about

You have the right to make a complaint regarding any part of your relationship with PuntPal, or any incident related to your participation in a game of chance. This includes, but is not limited to:

1. Deposit issues
2. Withdrawal issues
3. Bonus terms and conditions
4. Account closures or restrictions
5. Alleged errors or unfairness in game outcomes
6. Responsible gaming issues
7. Treatment of player balances
8. KYC and verification
9. Data protection
10. Technical or software issues



11. AML concerns
12. Issues relating to minors
13. Fraudulent games
14. Fraudulent practices
15. Licensing or regulation
16. Unfair terms and conditions

3. How to Make a Complaint

Step 1 — Contact Customer Support

If you have a concern or issue relating to your account, game outcomes, payments, bonuses, or any other matter, please contact our support team first. We are available 24/7 via:

- Live Chat — click the icon at the bottom-right of any page
- Email — info@puntpal.com

Our team will aim to resolve most issues promptly, typically within 24–48 hours.

Step 2 — Submit a Formal Complaint

If you are not satisfied with the initial resolution, you may escalate your concern by submitting a formal complaint using our official Complaint Submission Form.

The Complaint Submission Form is available both as a downloadable form that you can complete and return by email or upload, and as a form that can be completed and submitted online. The form is available in English and in the language of the website or domain you are using.

At a minimum, the form captures:

- Your name, address, and place of residence
- Your account number (if applicable)
- The date of the complaint and the date of the disputed event
- A description of the conduct being disputed (selected from the predetermined categories listed in section 2.1, where applicable)

We may ask you to provide supporting documentation in connection with your complaint. Any additional information or documentation we request will be reasonable in the context of resolving your complaint.

Submit completed forms to: info@puntpal.com

4. How We Handle Your Complaint

4.1 Acknowledgement

Within two (2) business days of receiving your complaint, we will:

- Confirm receipt of your complaint in writing;
- Provide an explanation of how your complaint will be processed; and
- Provide notice of the average timeline for resolution of such complaints.



This two-business-day acknowledgement period applies to every complaint we receive, including complaints relating to responsible gaming. The CGA's Player Complaints Policy Guidelines provide for a five (5) business day acknowledgement period for complaints generally and a two (2) business day period for responsible-gaming-related complaints. We apply the shorter two-business-day period in all cases.

4.2 Assessment and response

The period within which we assess and respond to your complaint depends on the nature of the complaint. We apply two distinct resolution periods, in line with the CGA's Player Complaints Policy Guidelines.

All complaints other than responsible-gaming-related complaints

We will assess and respond to your complaint within four (4) weeks of receipt. Where necessary, because of the complexity of the matter or a lack of information, this period may be extended once by a further four (4) weeks, with prior written notice to you.

Responsible-gaming-related complaints

Complaints falling within the definition in section 5 are prioritised and are resolved within a maximum of two (2) weeks of receipt. We use our best efforts to resolve such complaints within five (5) business days.

Extension where a delay is caused by the player

Where a delay in our response is due to a lack of, or a slow, response from you, the applicable resolution period — four weeks for all other complaints, or two weeks for responsible-gaming-related complaints — may be extended by no more than a further two (2) weeks. We will notify you in writing of any such extension and of the reason for it.

If we reasonably require additional information to address your complaint fully, we will request it within the applicable resolution period. Should you not provide the necessary information within that period, we may reject the complaint.

4.3 Final determination

You will always receive a final determination of your complaint in writing. Our response will be one of the following:

- A reasoned final assessment of the outcome or resolution of the complaint, with supporting evidence where necessary or applicable; or
- Detailed reasons for not handling the complaint.

If you are unsatisfied with the resolution and make a further complaint to that effect, you will be informed that you may escalate the matter to an independent Alternative Dispute Resolution (ADR) entity, as described in section 6.

5. Responsible Gaming Complaints

Complaints related to responsible gaming are prioritised due to their potential impact on player well-being. A complaint will be categorised as responsible-gaming-related whenever it concerns the targeting of Vulnerable Players, or the availability and/or timely implementation of self-exclusion or cooling-off measures and the mandated consequences thereof, as set out in our Responsible Gaming Policy.



Responsible-gaming-related complaints are acknowledged within two (2) business days of receipt and are resolved within a maximum of two (2) weeks of receipt. We use our best efforts to resolve such complaints within five (5) business days.

Where a delay in resolution is caused by a lack of, or a slow, response from you, the two-week resolution period may be extended by no more than a further two (2) weeks. We will notify you in writing of any such extension and of the reason for it. No other extension applies to responsible-gaming-related complaints.

If your issue relates to loss of control or gambling behaviour, please also visit our Responsible Gaming page for support and tools, or contact us at any time via Live Chat or info@puntpal.com.

6. Alternative Dispute Resolution (ADR)

If a complaint cannot be resolved internally, we will provide you with access to an independent Alternative Dispute Resolution (ADR) service. We will bear all costs of the ADR process. The provision of ADR services by PuntPal is mandatory.

Our approved ADR provider is: CADRE B.V. (Curaçao Alternative Dispute Resolution Entity), a CGA-certified ADR entity (CGA/ADR/2025/01), registered in Curaçao under number 165229, with registered address at Zuikertuintjeweg 14 Unit 3, Willemstad, Curaçao. Players may file a claim at <https://cadre.online/file-a-claim-international/>, and CADRE's rules of procedure are published at <https://cadre.online/rules-of-procedure/>. The dispute-resolution procedure at CADRE is free of charge to the player, and a decision of CADRE is binding on both the player and PuntPal.

Once the ADR process is completed, it cannot be recommenced by either you or PuntPal with a different ADR entity. In the event that you drop out of the ADR process after it has already begun, you will not have the right to resurface the dispute in the future.

Where PuntPal sets ADR parameters in order to prevent abuse — such as whether ADR must be undertaken before legal proceedings may be initiated, the binding nature of the ADR outcome on the player, or whether a minimum claim value is required for escalation to ADR — these conditions are set having carefully considered, and taken independent legal advice on, any applicable civil legislation, in line with CGA guidance.

Except where mutually agreed under the specific terms of ADR (Clause 5 of the Player Complaints Policy Guidelines), nothing in this policy restricts your right to take legal action.

7. The Role of the Curaçao Gaming Authority

PuntPal is operated by Misterio Vacio B.V. under the supervision of the Curaçao Gaming Authority (CGA). It is important that players understand what the CGA does, and does not, do in relation to complaints.

The CGA is not a dispute resolution body and does not adjudicate individual complaints between players and operators. An individual complaint is a matter for us in the first instance and, where it cannot be resolved internally, for the certified ADR entity named in section 6, whose decision is binding on both you and PuntPal.

The CGA does, however, supervise the way in which we handle complaints. In particular:



17. It sets the standards in the Player Complaints Policy Guidelines issued under the LOK, with which this policy must comply;
18. It certifies the ADR entities to which complaints may be escalated;
19. It may require access at any time to our records of complaints received and of disputes pending resolution, which we keep available at all times under section 8;
20. It receives the periodic complaints reports described in section 9; and
21. It may take supervisory or enforcement action, up to and including action against our licence, where an operator fails to handle complaints in accordance with the LOK and the Guidelines.

If you believe that we have failed to handle your complaint in accordance with this policy, or that we are otherwise in breach of our licence conditions, you may inform the CGA using the contact details published on its official website [CGA contact details to be inserted]. Contacting the CGA does not replace the internal complaints procedure or the ADR route described above, and the CGA will normally expect you to have used those routes first.

A reference to this policy, and to the role of the CGA set out in this section, is included in our Terms and Conditions.

8. Record Keeping

We keep records of unresolved complaints, and of complaints that have been escalated to ADR or to legal proceedings, for the lesser of five (5) years or the relevant period stipulated by data protection law, statutes of limitation, or other relevant laws or guidelines.

The CGA reserves the right to request, at any time, access to records of complaints received as well as any disputes pending resolution. We ensure that such records are readily available at all times.

9. Regulatory Reporting

We submit reports to the CGA on 15 January and 15 June each year, based on the complaints submitted to us through the Complaint Submission Form since the previous reporting period. Each periodic report summarises:

- The total number of complaints made;
- The total number of settled complaints (both upheld and rejected);
- The number of pending or unresolved complaints;
- The number of complaints by category;
- The number of complaints referred to ADR; and
- The number and detail of complaints for which a player has taken legal action.

10. Our Fair Play Commitment

PuntPal is committed to fair and responsible gaming, transparent communication, the protection of player rights, and compliance with applicable gaming regulations. All disputes are handled confidentially, and your account and funds remain secure throughout the process.



11. Contact

- Live Chat — available 24/7 on any page
- Email (general support and formal complaints) — info@puntpal.com
- Licensing authority — Curaçao Gaming Authority (CGA), licence reference OGL/2024/1334/1038 (authorisation under assessment)