

Complaint Handling Policy

Natural Nine B.V.

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1. Purpose

This policy outlines how Natural Nine's B.V. manages customer complaints in a manner that is fair, prompt, and consistent with the Curacao Gaming Authority (CGA)'s Player Complaint Policy Guidelines and broader responsible gaming standards.

2. Definitions

Complaint:

Any submitted or received Complaint Submission Form that includes an expression of dissatisfaction by a player registered with Natural Nine B.V. ("registered player" or "user") regarding the platform's products, services, terms, or conduct, or decisions, which indicates the user is unhappy and expects a response or resolution, whether made formally or informally.

Complainant:

A user that is registered with Natural Nine who submits or sends a Complaint to Natural Nine B.V..

Dispute

A complaint that has not been resolved to the user's satisfaction through the internal complaints process and has been escalated, either within the organisation or to an independent third party

Escalation:

The process of referring a complaint to higher levels of authority within the organisation for further review.

Resolution:

The outcome or decision provided to the complainant in response to their concern.

User:

Any individual who is registered as a user on the Shuffle.com website

User Interaction

Any written communication initiated by a user and directed to the operator's customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

3. Policy Statement

Natural Nine B.V is committed to delivering a transparent, respectful, and timely response to all complaints received. We aim to resolve issues efficiently and ensure that users are treated fairly and consistently, in line with applicable laws and regulatory expectations including those outlined under the CGA.

4. Complaint Process

a) Submission of Complaints

Users can lodge complaints through the following channels by completing the relevant Complaint Submission Form, including as illustrated within Appendix B:

- Email to our support team
- Live chat or in-app messaging

A user has the right to make a complaint regarding any part of their relationship with the operator, or any incident related to their participation in a game of chance. This includes cases of complaints as illustrated within **Appendix A** (but is not limited to).

Users can lodge a complaint **six months** after an incident occurred OR the settlement of the bet. However, the Company urges that they submit the complaint promptly.

All Complaints are logged in an internal CRM system with a timestamp, user ID, and nature of the Complaint.

b) Acknowledgement

Complaints will be acknowledged within **2 days** of receipt. Complainants will be informed with the below:

- Provide an explanation of how the complaint will be processed.
- Provide notice of the **timeline** for resolution of such complaints.

c) Investigation

A trained member of the Customer Support team investigates each complaint, reviewing:

- Account history and communication records
- Game logs or transaction data (as applicable)
- Any supporting documentation

The operator may request supporting documentation the user requires to include as part of the complaint

d) Rejection of Complaint

Natural Nine B.V may request additional information to address the complaint fully. Should the complainant not provide the necessary information within that time period, the operator may reject the complaint due to the non-escalation of the complaint by the client.

e) Resolution and Response

We will inform you with the exact timeframe for our final decision within the acknowledgement. If a resolution takes longer, users will be updated on the reason for delay and expected timeline. Outcomes will be communicated clearly in writing, with a rationale for the decision.

f) Escalation to a senior Manager

If the user is unsatisfied with the outcome, he may request an escalation to a senior support manager or the Compliance team. The second-level review will be completed within **a further 5 business days**.

g) Independent Review

If the complaint remains unresolved, users may be directed to an external alternative dispute resolution body as required under the CGA or relevant licensing jurisdictions, free of charge. We include all relevant information and details of the independent reviewee (ADR) within the Terms and Conditions. We would like to confirm that we will cooperate fully with any third-party adjudication process.

5. Record Keeping

Records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings will be kept for the lesser of five years or the relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.

6. Review and Compliance

This policy is reviewed periodically (approximately annually) or more frequently in response to regulatory updates, internal audits, or material changes in complaints handling requirements.

All changes are version-controlled and documented. The Compliance Lead is responsible for ensuring adherence to this policy.

Appendix A - Reasons for Complaint

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues
- Treatment of user 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

Appendix B – Complaint Form

- Please fill in the Complaint Form and submit it to the Company
- The Form must be filled out truthfully, completely and accurately.
- We reserve the right to dismiss a Form which is not completed accurately.

<u>Details of the Complainant</u>	
Name	
Surname	
Account Number	
Address (Include, Full Address, Post Code, City, Country)	
Telephone Number	
E-mail address	
<u>DETAILS OF THE COMPLAINT</u>	
Date(s) of incident(s) leading to Complaint	
Time of incident(s) leading to Complaint	
Type of product, service	
Description of the Complaint (Please write clearly and legibly).	
List of documents in support of your complaint enclosed with this form (Please enclose copies of all relevant documents e.g. Correspondences, Agreements, Proof of payments/invoices etc.)	
Signature	I hereby certify and confirm that to the best of my knowledge, the information furnished above is true, accurate, correct and complete.
	Date of Submission
<u>FOR OFFICIAL USE ONLY</u>	

Received on:	
Received by:	
Assigned to:	
Date of resolving	