

Complaint Handling Policy

Natural Nine B.V.

Last Updated: 28 November 2025

Version: 1.1

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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 National Ordinance on Games of Chance (LOK), the Player Complaint Policy Guidelines and broader responsible gaming standards.

2. Definitions

Complaint:

Any fully completed, submitted and received Complaint Submission Form that includes a User Interaction by a 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 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 Natural Nine B.V. for further review.

Resolution:

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

User:

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

User Interaction

A written communication initiated by a User and directed to the Natural Nine B.V. 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. It aims to resolve Complaints efficiently and ensure that Users are treated fairly and consistently, in line with applicable laws and regulatory expectations including those outlined by the Curaçao Gaming Authority (**CGA**)

4. Complaint Process

a) Submission of Complaints

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

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

A User may make a Complaint regarding any part of their relationship with the Natural Nine B.V., 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).

The Complaint Submission Form is available in English and if relevant, in any other language of a website domain that Natural Nine B.V. publishes or operates from time to time. While Users are encouraged to submit Complaints promptly, Users may lodge a Complaint, free of charge, at any time up to six months after an incident occurred OR the settlement of the bet.

In the case of P2P (such as poker) or ante post fixed odds betting the six month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager.

All Complaints are logged in an internal CRM system with a timestamp, user ID, and nature of the Complaint. While Natural Nine B.V. may utilize AI to assist in support, in some cases will be handled by human support agents.

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 expected 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 Natural Nine B.V. 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 Natural Nine B.V. may reject the Complaint due to the non-escalation of the Complaint or abandonment by the individual.

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

User unsatisfied with an outcome may request an escalation to a senior representative. 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 by 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. Natural Nine B.V. will cooperate with a legitimate good faith 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. Relevant reports will be submitted to the CGA as required from time to time.

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.

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 Natural Nine B.V.
- 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	