

# Swervy International B.V.

**CUSTOMER COMPLAINTS HANDLING POLICY**

**VERSION 1.2**

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## **1. SCOPE OF THE POLICY:**

1.1 This policy is designed to provide guidance on the manner, in which the company receives, investigates and resolves complaints, related to its products and services. Mere enquiries about products or services or those complaints that are resolved at first instance are not treated as complaints and such are handled through our standard customer support procedures.

## **2. OBJECTIVE:**

2.1 We strive to build long term relationships with our customers by being supportive at any time, especially when customers feel they need us most. We provide a professional, yet caring and positive customer experience. We compliment this by encouraging our customers to give us genuine and honest feedback, which we understand, may not always be positive. This Customer Complaints Handling Policy serves to ensure our customers are fully aware that we value their relationship. Therefore, we ask customers to help us improve our service, by encouraging them to contact us, regarding any matter, when they feel that their expectations have not been met or where they feel that we have incorrectly or unfairly handled a case.

### **2.2 The policy is designed to achieve the following outcomes:**

- 2.2.1 Deliver a resolution to an enquiry within an acceptable time frame.
- 2.2.2 Establish an escalation procedure.
- 2.2.3 Establish the difference between complaints and disputes
- 2.2.4 Priority for responsible gambling issues: Complaints related to responsible gaming, such as self-exclusion breaches or protection of vulnerable players, will be prioritized and resolved within five business days.

### **2.3 What is a complaint and how do we handle complaints?**

2.3.1 A complaint is a communicative expression of displeasure about any aspect of the Company's operations and conduct of activities which goes beyond a general enquiry. When a customer is not satisfied with the outcome of his/her enquiry or does not receive a response within a reasonable time, s/he is encouraged to lodge an official complaint to the Customer Support (CS) team for further investigation. Our Customer Support (CS) team are provided with sufficient training and information to be able to recognise where simple complaints should be referred to the formal complaint procedure.

## **2.4 How to complain?**

2.4.1 Customers are encouraged to send any general queries, grievances or complaints at the first instance to customer support by contacting them on chat or otherwise by email. The following information should be included in the complaint to help us swiftly identify the issue at hand which improves our response time:

- First Name
- Surname
- Email address
- Phone number
- Username
- The game which is subject to the complaints
- Disputed Amount
- Date of Incident
- Time of Incident
- A description of the complaint

Complaints made by social media are not attended to. We encourage to complain only in the manner, specified in this policy.

## **3. ESCALATIONS OF COMPLAINTS TO MANAGERS**

3.1.1 Where our customer support agents cannot handle certain specific complaints, our agents will escalate the complaint to a line manager. Where a customer is not satisfied with the response to the initial complaint, the customer may also request that a senior individual review the complaint.

### **3.1.2 What is a dispute and how do we handle disputes?**

A dispute is anything relating to the outcome of a complaint in reference to a gambling transaction and which has not been resolved at the first stage of the complaint's procedure. If after a formal response, the complaint has not been resolved to the customer's satisfaction, the matter can be pursued further by escalating to a manager.

## 4. INELIGIBILITY OF CLAIMS:

4.1 No claim or dispute with regard to a transaction that was concluded more than 6 months prior will be considered, except in situations where the customer had no reasonable means to know about the issue leading to the claim at that time, in which case the ninety days start running from the date that the customer could have reasonably known about the matter at hand.

## 5. RESPONSE TIME FRAME

Players have up to six months after a disputed bet or incident to submit a formal complaint.

Within 48 hours of receiving a complaint, we aim to contact the customer and acknowledge the complaint.

We aim to resolve the complaints within 14 days of receipt of the complaint. Whilst we will endeavour to resolve the complaint within the first 14 days, the maximum duration for a complaint to be resolved is eight (8) weeks.

5.1.1 Where complaints remain unresolved after 8 weeks, a 'deadlock' email will be sent to the customer explaining:

5.1.2 The final decision

5.1.3 That this is the end of the complaints process

Players will be reminded that all complaints will be treated in the strictest confidence as far as possible, and that their data will be processed in accordance with the Company's privacy policy.

## 6. RESPONSIBLE GAMING-RELATED COMPLAINTS

6.1 The Company will receive and assess all complaints in a fair, transparent and timely manner. Complaints relating to Responsible Gaming concerns, including matters involving gambling-related harm or requests for self-exclusion, will always be prioritized and processed with urgency in accordance with the Player Protection and Responsible Gaming Framework of the Curacao Gaming Authority (CGA).

6.2 Players may submit a complaint within six (6) months from the date on which the matter giving rise to the complaint occurred or the date on which the player could reasonably have become aware of the issue. Any reference to shorter complaint submission periods in these Terms shall not apply to Responsible Gaming-related complaints and shall be interpreted in line with CGA requirements.

6.3 If your complaint involves **self-exclusion** or other responsible-gambling tools:

- Your account will be immediately suspended while the issue is reviewed.
- We will confirm whether the self-exclusion request was properly processed.
- Any funds wagered after a valid self-exclusion request may be **refunded**, subject to verification.
- We will ensure no marketing or promotional materials are sent to you during or after the exclusion period.
- Such cases are treated as **priority complaints** and resolved within **5 business days**.

Complaints relating to Responsible Gambling or Self-Exclusion are prioritized and reviewed within 48 hours of receiving a complaint.

## **7. Escalation to Alternative Dispute Resolution (ADR)**

If a complaint is not resolved to the Customer's satisfaction, the matter may be escalated to an independent Alternative Dispute Resolution (ADR) body, which will review the dispute impartially. ADR services are provided free of charge to the Customer.

## **8. Record-Keeping and Reporting**

The Company maintains a detailed record of all received complaints for a minimum period of five (5) years, including:

- Resolved complaints (upheld or rejected);
- Unresolved complaints;
- Complaints escalated to ADR or legal action.

The Company submits regular reports on complaint statistics and outcomes to the appropriate regulatory body, as required.

## **9. Confidentiality**

All complaints and communications are treated as confidential, in line with GDPR and the CGA's privacy guidelines.