

SUREWIN B.V.

Customer Complaints Handling Policy

Version 1.2

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1. SCOPE OF THE POLICY

This Complaints Handling Policy establishes the framework through which Surewin B.V receives, investigates, manages and resolves player complaints and disputes in a fair, transparent, efficient and timely manner.

The Policy applies to all players using Surewin B.V 's services and is implemented in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK), together with any applicable guidance, policies and directives issued by the Curaçao Gaming Authority (CGA).

Surewin B.V is committed to ensuring that all players have access to a clear and accessible complaints procedure and, where applicable, access to independent Alternative Dispute Resolution (ADR) services at no cost to the player.

General enquiries, requests for information, feedback, or matters resolved immediately by customer support are not considered formal complaints and will continue to be handled through Surewin B.V 's standard customer support channels

2. OBJECTIVE

The objective of this Policy is to ensure that all player complaints are handled fairly, consistently, transparently and within reasonable timeframes.

Surewin B.V is committed to providing players with a clear and accessible process through which concerns, complaints and disputes may be raised, investigated and resolved. Surewin B.V aims to resolve complaints at the earliest possible stage while ensuring that players are treated fairly and receive a reasoned outcome.

2.1 THE POLICY IS DESIGNED TO ACHIEVE THE FOLLOWING OUTCOMES

- a. Provide players with a clear, fair and accessible complaints process.
- b. Deliver complaint resolutions within established and reasonable timeframes.
- c. Establish a structured escalation procedure for unresolved complaints and disputes.
- d. Clearly distinguish between player interactions, complaints and disputes.
- e. Ensure responsible gaming-related complaints are prioritised and investigated without delay.
- f. Provide players with access to independent Alternative Dispute Resolution (ADR) services where complaints remain unresolved.
- g. Promote transparency, accountability and consistency in complaint handling.
- h. Support compliance with applicable regulatory and licensing requirements.

2.2 PLAYER INTERACTIONS, COMPLAINTS AND DISPUTES

A. PLAYER INTERACTION

A player interaction is any written communication initiated by a player and directed to Surewin B.V 's customer support team. This includes general enquiries, feedback, requests for information, assistance or clarification regarding Surewin B.V 's products, services or operations.

B. COMPLAINT

A complaint is a written expression of dissatisfaction by a player relating to Surewin B.V 's services, decisions, terms, products, conduct or operations, where the player indicates dissatisfaction and expects a response, investigation or resolution.

Where a player is dissatisfied with the outcome of a player interaction, or where a matter cannot be resolved through standard customer support procedures, the matter may be escalated and treated as a formal complaint.

C. HANDLING OF COMPLAINTS

All complaints received by Surewin B.V will be assessed fairly, impartially and in accordance with the procedures set out in this Policy. Complaints will be investigated by appropriately trained personnel and resolved within the applicable timeframes prescribed in this Policy.

D. DISPUTE

A dispute is a complaint that has not been resolved to the player's satisfaction through Surewin B.V 's internal complaints process, and which has subsequently been escalated internally, to an Alternative Dispute Resolution (ADR) provider, or through another legally recognised dispute resolution process.

2.3 HOW DO YOU COMPLAIN?

- a. Complaints relating to a player account may only be submitted by the registered account holder. Surewin B.V may require reasonable verification to confirm the identity of the complainant before processing a complaint.
- b. In the first instance, players are encouraged to contact Customer Support via live chat, email, or any other communication channels made available by Surewin B.V. Where a matter cannot be resolved through normal customer support procedures, the player may submit a formal complaint using Surewin B.V 's official Complaint Submission Form.
- c. Upon receipt of a formal complaint, Surewin B.V will assign a unique complaint reference number which will be included in all correspondence relating to the complaint.
- d. The Complaint Submission Form may be made available electronically through Surewin B.V 's website and/or as a downloadable form that may be completed and submitted to Surewin B.V.

- e. The Complaint Submission Form will include, at a minimum, the following information:
- Full name of the complainant;
 - Residential address;
 - Place of residence;
 - Email address;
 - Telephone number (where available);
 - Account username or account number;
 - Date on which the complaint was submitted;
 - Date of the disputed event or incident;
 - The category of complaint (where applicable);
 - The game, product or service relevant to the complaint (where applicable);
 - The disputed amount (where applicable);
 - A detailed description of the complaint.
- f. The Complaint Submission Form will be made available in English and, where applicable, in the language of the website or domain used by the player.
- g. Surewin B.V may request additional information or supporting documentation where reasonably necessary to investigate and resolve a complaint. Any such request will be proportionate and relevant to the complaint being investigated.
- h. Complaints submitted through social media platforms will not be processed as formal complaints. Players will be directed to the official complaint channels outlined in this Policy.
- i. The complaints process is free of charge to all players. Surewin B.V will ensure that complaint submission channels remain accessible, fair, transparent and easy to use.
- j. An internal complaints register will be kept by Surewin B.V. See Appendix 1 for sample Complaints register)
- k. The Compliance Officer will be responsible for maintaining the Complaints Register and overseeing compliance with this Policy.
- l. Surewin B.V will periodically analyse complaint data to identify recurring issues, systemic weaknesses, operational deficiencies and opportunities for improvement.

3. ESCALATIONS OF COMPLAINTS TO MANAGERS

Surewin B.V is committed to resolving complaints at the earliest possible stage. Where a complaint cannot be resolved immediately, the following escalation process will apply:

Stage 1 – Customer Support Review

Players should first raise concerns with Surewin B.V 's Customer Support Team through the communication channels made available by Surewin B.V. Customer Support will attempt to resolve the matter promptly and fairly.

Stage 2 – Formal Complaint Submission

Where the matter cannot be resolved through Customer Support, or where the player remains dissatisfied with the outcome, the player may submit a formal complaint using Surewin B.V.'s Complaint Submission Form in accordance with this Policy.

Stage 3 – Management Review

Where a complaint remains unresolved following the initial investigation, or where the player is dissatisfied with the outcome provided, the complaint may be escalated for review by an appropriately authorised manager or senior member of staff who was not directly involved in the original assessment where reasonably practicable.

The reviewing manager will independently assess the complaint, consider all relevant information and provide a written determination to the player.

Stage 4 – Alternative Dispute Resolution (ADR)

Where the complaint remains unresolved following completion of Surewin B.V.'s internal complaints process, the player may escalate the matter to an independent Alternative Dispute Resolution (ADR) provider in accordance with Section 7 of this Policy.

Stage 5 – Other Legal Remedies

Nothing in this Policy will prevent a player from exercising any legal rights or remedies available under applicable law.

3.1 WHAT IS A DISPUTE AND HOW DO WE HANDLE DISPUTES?

Where a complaint has been investigated and a final determination has been issued by Surewin B.V., but the player remains dissatisfied with the outcome, the matter will be considered a dispute.

Surewin B.V. will review any additional information provided by the player and may, where appropriate, conduct a further assessment of the matter before issuing its final internal decision.

Where a dispute cannot be resolved through Surewin B.V.'s internal complaints process, the player will be informed of their right to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider in accordance with Section 7 of this Policy.

Surewin B.V. will cooperate fully with any ADR process and will provide all relevant information reasonably required for the independent review of the dispute.

4. INELIGIBILITY OF CLAIMS

Players may submit a complaint free of charge within six (6) months of the settlement of the bet, transaction, event or incident giving rise to the complaint.

Complaints submitted outside of this period may not be considered unless Surewin B.V. determines that exceptional circumstances exist which reasonably prevented the player from submitting the complaint within the prescribed timeframe.

Surewin B.V reserves the right to request information or evidence supporting any claim that exceptional circumstances prevented the complaint from being submitted within the applicable period.

5. RESPONSE TIME FRAME

5.1 RESPONSIBLE GAMING COMPLAINTS

Complaints relating to responsible gaming matters, including self-exclusion, vulnerable persons, cooling-off periods, gambling-related harm, affordability concerns, or player protection measures, will be prioritised and handled with urgency.

Within two (2) days of receiving a responsible gaming-related complaint, Surewin B.V will:

- Acknowledge receipt of the complaint in writing;
- Explain how the complaint will be processed; and
- Provide an indication of the expected timeframe for resolution.

Surewin B.V will resolve responsible gaming-related complaints within five (5) business days, where reasonably practicable. For purposes of this Policy, "Business Day" means any day other than a Saturday, Sunday or public holiday.

Where additional time is reasonably required to investigate the complaint, Surewin B.V may extend the resolution period by up to two (2) weeks and will notify the player accordingly. Where the delay is caused by a lack of information or delayed responses from the player, the resolution period may be extended by a further two (2) weeks.

5.2 ALL OTHER COMPLAINTS

Within one (1) week of receiving a complaint, Surewin B.V will:

- Acknowledge receipt of the complaint in writing;
- Explain how the complaint will be processed; and
- Provide an indication of the expected timeframe for resolution.

Surewin B.V will aim to investigate and resolve complaints within four (4) weeks of receipt.

Where additional time is required due to the complexity of the matter or the need for further information, Surewin B.V may extend the investigation period once for a further four (4) weeks. The player will be notified in writing of the reason for the extension and the revised expected resolution date.

5.3 FINAL RESPONSE

Upon completion of its investigation, Surewin B.V will provide the player with a written final determination which will include:

The outcome of the complaint;

- The reasons supporting the decision;

- Any corrective action or remedy offered, where applicable; and
- Information regarding the player's right to escalate the matter to Alternative Dispute Resolution (ADR) where the player remains dissatisfied with the outcome.

6. RESPONSIBLE GAMING-RELATED COMPLAINTS

Surewin B.V will receive and assess all responsible gaming-related complaints in a fair, transparent and timely manner.

Responsible gaming-related complaints include, but are not limited to:

- Self-exclusion requests and breaches;
- Cooling-off periods;
- Vulnerable player protections;
- Gambling-related harm;
- Affordability concerns;
- Player protection measures;
- The targeting of vulnerable persons through marketing or promotional activities.

Responsible gaming-related complaints will be treated as priority matters and investigated without delay in accordance with Surewin B.V 's Responsible Gaming Policy and applicable CGA requirements.

Where a complaint involves a self-excluded player, cooling-off period, vulnerable player concern, or other responsible gaming matter, Surewin B.V may take immediate protective measures, including temporary account restrictions or suspension, while the matter is being investigated.

- Where appropriate, Surewin B.V will:
- Verify whether any responsible gaming controls were properly implemented;
- Review all relevant player protection interactions and account records;
- Assess whether any regulatory obligations have been breached; and
- Determine whether any remedial action is required.

Responsible gaming-related complaints will be reviewed by appropriately trained personnel and will not be determined solely through automated or artificial intelligence systems.

The timelines applicable to responsible gaming-related complaints are set out in Section 5.1 of this Policy.

7. ESCALATION TO ALTERNATIVE DISPUTE RESOLUTION (ADR)

Where a player remains dissatisfied following completion of Surewin B.V 's internal complaints process, the player may escalate the complaint to an independent Alternative Dispute Resolution (ADR) provider, CADRE who is an approved ADR from the CGA.

CADRE services will be made available to players free of charge. Surewin B.V will bear the costs associated with the ADR process in accordance with applicable regulatory requirements.

Upon completion of Surewin B.V 's internal complaints process, players will be provided with information regarding:

- Their right to refer the matter to ADR; (CADRE)
- The relevant ADR provider; (CADRE)
- The procedure for submitting the dispute;
- Any applicable ADR (CADRE) requirements or conditions.

Surewin B.V will cooperate fully with any ADR (CADRE) investigation and will provide all information and documentation reasonably required for the independent assessment of the dispute.

Once an ADR process has been completed and a determination has been issued, the same dispute may not be re-submitted to a different ADR provider.

Nothing in this Policy will prevent a player from exercising any legal rights or remedies available under applicable law, subject to the terms and conditions governing any ADR process.

7.1 ADR PROVIDER DETAILS

CADRE is an Alternative Dispute Resolution provider approved by the Curaçao Gaming Authority under licence number CGA/ADR/2025/01.

Should a Player feel that the dispute was not resolved to his satisfaction, the Player can refer the dispute to CADRE. CADRE is an independent alternative dispute resolution entity. The dispute resolution procedure at CADRE is free of charge for the Player independent of the outcome.

Decisions of CADRE are binding upon Operator and Player. The procedure before CADRE does not restrict or prejudice the Player's right to bring proceedings against the Operator in any court of competent jurisdiction.

ADR Provider: CADRE (Curacao Alternative Dispute Resolution Entity)

Website: [CADRE – Curaçao Alternative Dispute Resolution Entity](#)

Complaint Portal: [File a Claim \(International\) – CADRE](#)

7.2 ROLE OF THE CURAÇAO GAMING AUTHORITY (CGA)

The Curaçao Gaming Authority (CGA) does not mediate, resolve, adjudicate or make decisions regarding individual player complaints or gambling-related disputes.

Players may contact the CGA directly regarding matters relating to regulatory breaches, licence conditions, malpractice, misconduct, whistleblowing concerns or other regulatory issues involving Surewin B.V.

While the CGA does not intervene in individual disputes, information received from players may be used by the CGA as part of its supervisory, monitoring, compliance and enforcement activities.

Surewin B.V will cooperate fully with any lawful investigation, information request or regulatory enquiry received from the CGA.

8. RECORD-KEEPING AND REPORTING

Surewin B.V will maintain accurate, complete and secure records of all complaints received, investigated and resolved under this Policy.

Complaint records will include, where applicable:

- Complaint reference number;
- Date received;
- Complainant details;
- Nature and category of the complaint;
- Investigation actions undertaken;
- Outcome of the complaint;
- Date of resolution;
- Any corrective actions implemented;
- Details of any escalation to management, Alternative Dispute Resolution (ADR) or legal proceedings.

Surewin B.V will maintain records of:

- Complaints upheld;
- Complaints rejected;
- Pending or unresolved complaints;
- Complaints escalated to ADR;
- Complaints subject to legal proceedings.

Complaint records will be retained for a minimum period of five (5) years, or for such longer period as may be required by applicable law, regulatory requirements, data protection obligations or legal proceedings.

Surewin B.V may prepare periodic complaint reports for regulatory, compliance and governance purposes. Such reports may include:

- Total number of complaints received;
- Complaint categories;
- Complaint outcomes;
- ADR referrals;
- Legal actions relating to complaints;
- Complaint resolution trends.

Surewin B.V will cooperate with any lawful request from the Curaçao Gaming Authority (CGA) or other competent authority for access to complaint records, statistics or supporting documentation.

Surewin B.V submits regular reports on complaint statistics and outcomes to the appropriate regulatory body, as required.

9. TRAINING

Employees responsible for complaint handling will receive appropriate training regarding complaint management, dispute resolution procedures, responsible gaming complaints and regulatory obligations.

10. CONFIDENTIALITY

- a. Surewin B.V will treat all complaints, investigations and related communications confidentially and will process personal information in accordance with applicable data protection and privacy laws.
- b. Information relating to a complaint will only be disclosed to persons who require access to the information for the purpose of investigating, resolving, reviewing or reporting on the complaint, including authorised employees, Alternative Dispute Resolution (ADR) providers, regulatory authorities, legal advisers or other competent authorities where required by law.
- c. Complaint records will be stored securely, and access will be restricted to authorised personnel only.
- d. Players will not be disadvantaged, discriminated against, retaliated against, or treated unfairly because of submitting a complaint, participating in a complaint investigation, or exercising any rights available under this Policy.
- e. Surewin B.V will take reasonable measures to ensure the integrity, security and confidentiality of complaint information throughout the complaint handling process.

11. POLICY REVIEW

This Policy will be reviewed at least annually and whenever there is a material regulatory change.

12. APPENDIX 1 – COMPLAINTS REGISTER

Complaints Register

Reference number	Date of complaint	Player name	Username (if applic)	Contact info	Link to back office	Complaint nature	Description of complaint	Resolution	Date of resolution