

Player Complaints Policy

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Version: 1.1

1. Policy Overview

This Player Complaints Policy sets out the procedures by which Platinum Technology N.V. (“**the Operator**”) receives, investigates, and resolves player complaints and disputes in a fair, transparent, and timely manner. The policy is designed to ensure compliance with applicable gaming regulations and licence conditions, including the requirements under the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK), and relevant guidance issued by the Curaçao Gaming Authority (CGA).

This policy ensures that players have access to an effective internal complaints process and to free, independent Alternative Dispute Resolution (ADR) services where a complaint cannot be resolved internally.

This policy does not affect or override the Operator’s obligations under applicable private law. The Operator remains responsible for ensuring that its Terms and Conditions and complaints handling processes comply with all relevant civil law requirements.

The Player Complaints Policy is referenced in, and forms part of, the Operator’s Terms and Conditions and is accessible on the Operator’s website.

2. Definitions

2.1 Player Interaction

Any written communication initiated by a player and addressed to the Operator’s customer support team, including enquiries, feedback, or requests for assistance or clarification.

2.2 Complaint

A written expression of dissatisfaction by a player relating to the Operator’s services, decisions, terms, or conduct, where the player expects a response or resolution.

For reporting purposes, a complaint is deemed to exist once a Complaint Submission Form has been submitted or when a matter has been escalated to ADR.

2.3 Dispute

A complaint that has not been resolved to the player’s satisfaction through the internal complaints process and has been escalated internally or to an independent third party, such as an ADR provider or a court of law.

3. Complaint Submission Process

3.1 Complaint Window

Players may submit a complaint free of charge up to six (6) months after the settlement of the bet or the occurrence of the incident giving rise to the complaint.

For peer-to-peer (P2P) games or ante-post betting, the six-month period begins upon settlement of the bet or conclusion of the relevant event.

In the case of in-running betting complaints, players are encouraged to raise issues promptly, as certain data required for investigation may not be available indefinitely.

3.2 Stages and Escalation of Complaint Resolution

Complaints may only be submitted by the registered account holder. Complaints submitted by third parties will not be accepted.

Players may submit complaints or raise issues through the following customer support channels, which are available twenty-four (24) hours a day, seven (7) days a week:

- Online customer service accessible via the Website;
- The customer support Email address displayed in the Website footer;
- By clicking the relevant support banner on the Website, which redirects the player to the Operator's official WhatsApp support channel; and
- By clicking the relevant support banner on the Website, which redirects the player to the Operator's official Telegram support channel.

In the first instance, players are encouraged to attempt to resolve their issue through these customer support channels. If the matter is not resolved to the player's satisfaction, the player may submit an official Complaint Submission Form.

The form is available online and/or as a downloadable document and requires, at a minimum:

- Player's full name, address, and place of residence;
- Player account number or username;
- Date of the complaint and date of the disputed event;
- A description of the issue, including selection of relevant complaint categories where applicable.

The form is available in English and in the language of the website used by the player.

The Operator may request reasonable supporting documentation necessary to investigate the complaint.

Where a complaint cannot be resolved internally, the player has the right to escalate the matter to an independent ADR provider. Nothing in this policy restricts the player's right to pursue legal action, subject to applicable law and any mutually agreed ADR terms.

3.3 Role of the Curaçao Gaming Authority (CGA)

The CGA does not mediate or decide individual player complaints relating to gambling transactions.

The CGA will not normally review or overturn decisions made by the Operator or an ADR provider, unless a complaint appears to have been inadequately handled.

Players may contact the CGA directly regarding regulatory concerns, including suspected breaches of licence conditions or whistleblowing matters.

4. Complaint Resolution Process

4.1 Responsible Gaming Complaints

Complaints relating to responsible gaming matters (including self-exclusion, cooling-off, or the treatment of vulnerable players) are prioritised due to their potential impact on player well-being.

Receipt of the complaint will be acknowledged in writing within two (2) business days. The Operator will use its best efforts to resolve such complaints within five (5) business days. Where additional time is required, the player will be informed, and any extension will not exceed two (2) weeks, unless delayed by the player's failure to provide information reasonably required for the investigation.

4.2 All Other Complaints

Receipt of the complaint will be acknowledged in writing within one (1) week. Complaints will normally be resolved within four (4) weeks. Where necessary due to complexity or missing information, the resolution period may be extended once by up to four (4) additional weeks, with written notice to the player.

4.3 Response and Outcome

Players will receive a written final determination of their complaint. The response will set out the decision reached, the reasons for that decision, and any supporting information where relevant.

If a complaint cannot be handled or is rejected due to insufficient information, the player will be informed of the reasons. Where the player remains dissatisfied with the outcome, they will be advised of their right to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider.

4.4 Use of Artificial Intelligence (AI)

AI tools may be used to assist in complaint handling, provided that:

- Complaints relating to responsible gaming are handled by a human agent;
- Complex complaints are reviewed and decided by a human agent; and
- AI-driven decisions are monitored to ensure consistency, fairness, and accuracy.

5. Alternative Dispute Resolution (ADR)

The Operator provides access to independent Alternative Dispute Resolution (ADR) services free of charge to players where a complaint cannot be resolved through the internal complaints process.

For the purpose of regulatory compliance, the Operator intends to engage eCOGRA (eCommerce Online Gaming Regulation and Assurance) as its ADR provider. eCOGRA is an independent dispute resolution body specialising in online gaming disputes.

The Operator bears all costs associated with the ADR process. Once an ADR procedure has been completed, the same dispute may not be resubmitted to another ADR provider.

The binding or non-binding nature of ADR outcomes, together with the applicable procedure and contact details, will be communicated to the player at the time of escalation and made available via the Website and/or Terms and Conditions.

6. Record-Keeping and Reporting

The Operator maintains accurate records of all complaints and disputes.

Complaint data is reported to the CGA in accordance with regulatory reporting schedules.

Records of unresolved complaints, ADR cases, and legal disputes are retained for the legally required period, up to a maximum of five (5) years.

Complaint records are made available to the CGA upon request.

7. Availability and Terms and Conditions

This Player Complaints Policy is published as a standalone document on the Operator's website, with a clear and direct link provided on the website homepage and/or registration page.

The policy is referenced in the Operator's Terms and Conditions for transparency and regulatory compliance. Players may be required, at the Operator's discretion and in accordance with applicable law, to explicitly confirm acceptance of this policy during account registration or via other appropriate means.

The Terms and Conditions include:

- Customer support contact details;
- Instructions for submitting a complaint;
- Applicable timelines;
- Player rights, including access to ADR;
- Clarification that the Curaçao Gaming Authority does not resolve individual disputes.

8. Grounds for Complaint

Players may submit complaints regarding any aspect of their relationship with the Operator, including but not limited to:

- Deposits and withdrawals;
- Bonuses and promotions;
- Account restrictions or closures;
- Game fairness or technical issues;
- Responsible gaming matters;
- KYC, AML, and verification processes;
- Data protection and privacy;
- Alleged fraud, misconduct, or regulatory breaches.