

PLAYER COMPLAINTS POLICY

Operator: Play UK Internet N.V.

Domain: www.playhugelottos.com

Registered Email: info@playukinternet.com

Version: 1.0

Effective Date: 18th July 2025

Governing Law: National Ordinance on Games of Chance (LOK), Curaçao

Issued Under Supervision of: Curaçao Gaming Authority (CGA)

1. INTRODUCTION AND PURPOSE

This Player Complaints Policy establishes a comprehensive and accessible framework for the submission, handling, resolution, and reporting of player complaints at Play UK Internet N.V. (hereinafter 'PlayUK', in strict compliance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the regulations issued by the Curaçao Gaming Authority (CGA).

The policy ensures that all players are offered a fair, objective, timely, and transparent complaints resolution process that includes access to independent **Alternative Dispute Resolution (ADR)** mechanisms, free of charge.

All complaints must be processed without prejudice, discrimination, delay, or unfair treatment. PlayUK maintains a zero-tolerance approach to the mishandling or non-responsiveness of player grievances.

2. DEFINITIONS

- **Player Interaction:** Any written correspondence initiated by a player directed to PlayUK's customer support team, including but not limited to inquiries, feedback, concerns, and service requests.
- **Complaint:** A formal expression of dissatisfaction concerning PlayUK's services, decisions, conduct, or platform functionality, submitted in writing by a registered player.
- **Dispute:** A complaint which, after completion of PlayUK's internal complaints process, remains unresolved and is escalated to an independent ADR entity or legal forum.

- **Responsible Gaming Complaint:** Any complaint that involves matters related to self-exclusion, vulnerability of players, non-compliance with cooling-off or exclusion tools, or the failure of PlayUK to protect players at risk.
-

3. SCOPE AND ELIGIBILITY

This policy applies exclusively to individuals who:

- Hold a registered and verified player account with PlayUK.
- Are submitting complaints regarding their own gameplay, transactions, or interactions.
- Are doing so within the allowable time frame of six (6) months from the date of the incident or bet settlement.

Third-party or group complaints, or those submitted by agents or legal representatives (except in the case of incapacity), are not permitted.

4. COMPLAINT SUBMISSION PROCESS

4.1 Channels of Communication

Players may lodge a complaint via one of the following official channels:

- **Email:** info@playukinternet.com
- **Live Chat:** Accessible through the website footer at www.playhugelottos.com
- **Online Form:** Available in the 'Support' or 'Help' section of the website

4.2 Submission Requirements

A valid complaint submission must include:

- Player's full legal name and email address

- Registered username or account number
- Date of the incident or disputed transaction
- Detailed description of the issue
- Preferred communication language
- Attachments or evidence (e.g., screenshots, transaction IDs) if applicable

Complaints may be submitted in **English** or any additional language supported on the site.

4.3 Submission Window

- The complaint must be submitted within six (6) months of the bet settlement or the incident occurring.
- For P2P and ante-post wagers, the period starts at the conclusion of the event.
- For in-running bets (e.g., live sports), players should act promptly due to possible unavailability of ephemeral data (e.g., odds, time logs).

5. INTERNAL COMPLAINT RESOLUTION PROCESS

5.1 Acknowledgement

All complaints will be acknowledged:

- **Within 2 business days** for responsible gaming-related complaints
- **Within 7 calendar days** for all other complaint types

The acknowledgment shall contain:

- Confirmation of receipt
- Assigned complaint reference number

- Summary of the handling process and estimated timeline

5.2 Investigation and Communication

The responsible department shall:

- Review the facts and supporting materials in an impartial manner
- Request additional information if required (within the initial four-week resolution window)
- Maintain communication with the player regarding the progress

5.3 Resolution Timeline

Complaint Type	Initial Resolution Time	Maximum Extension (with justification)
Responsible Gaming	5 business days	Up to 2 weeks (if due to internal delay or investigation complexity)
General Complaints	4 weeks	Additional 4 weeks (if complexity or player delay justifies it)

Players will be updated if timelines are extended and provided justification in writing.

5.4 Final Determination

The resolution will be issued in writing and may include:

- A reasoned explanation of the outcome
- Summary of the investigation and evidence reviewed
- Invitation to escalate to ADR if the player is not satisfied

If a player does not respond within **two weeks** of receiving the final determination, the case will be marked as closed.

6. USE OF ARTIFICIAL INTELLIGENCE (AI)

- **AI Assistance** may be used to analyze and categorize standard complaints.
- **Human Review Required** for:
 - All Responsible Gaming-related complaints
 - Any complaint marked as complex or escalated
- All AI outputs are monitored and audited for:
 - Consistency of outcomes
 - Absence of bias or discrimination
 - Reasonableness and accuracy

No AI-based communication will be used once a complaint is categorized as high-risk, vulnerable player-related, or legally sensitive.

7. ALTERNATIVE DISPUTE RESOLUTION (ADR)

In the event that the internal complaint resolution does not satisfy the player:

- The player may request to escalate the complaint to an **independent ADR provider**, certified by the CGA.
- PlayUK will bear **100% of the cost** of the ADR service.
- The ADR provider's decision may be **binding or non-binding**, depending on the agreement in place and relevant legal frameworks.

Important ADR Rules:

- ADR is **free of charge** to the player.
- Once the ADR process is initiated, the case may not be reopened with another ADR provider.

- If a player drops out of the ADR process, the dispute may not be re-filed later.
 - ADR contact details and procedures will be provided by PlayUK upon written request or automatically if internal resolution fails.
-

8. ROLE OF THE CURAÇAO GAMING AUTHORITY (CGA)

The CGA does **not intervene in individual player disputes**. However:

- Players may report regulatory breaches or misconduct directly to the CGA via their contact portal.
- The CGA monitors complaint data submitted by operators and may take supervisory or enforcement actions based on patterns or breaches of license conditions.

PlayUK must not limit or discourage a player from contacting the CGA for valid regulatory reasons.

9. RECORDKEEPING AND REPORTING OBLIGATIONS

9.1 Reporting to CGA

PlayUK is required to submit complaint data to the CGA:

- **Bi-annually** by **January 15** and **June 15** each year
- Report to include:
 - Total complaints received
 - Complaint categories
 - Number resolved, rejected, pending
 - Number escalated to ADR or legal action

9.2 Data Retention

- All complaint data and ADR outcomes must be retained for **five (5) years** or longer if required by applicable data protection legislation.
 - All complaint records are stored securely and may be audited by the CGA upon request.
-

10. PUBLICATION & PLAYER AWARENESS

This policy is:

- Included in the **Terms & Conditions** of PlayUK
- Referenced during player **registration and KYC** procedures

All players are deemed to have read, understood, and accepted this policy upon account creation or continued use of the service.

11. GROUNDS FOR COMPLAINT

Players may raise complaints related to, but not limited to:

- Deposit or withdrawal issues
- Bonus misapplication or misleading offers
- Game fairness or malfunctions
- Account blocking, closures, or restrictions
- Responsible gaming features not functioning correctly
- Delays or failures in KYC/AML processing
- Misuse of player data or data breaches
- Allegations of fraud, collusion, or unfair advantage

- Breach of applicable law or CGA license terms
-

12. TRANSITION DEADLINE AND VERSION CONTROL

- This Player Complaints Policy has been implemented in compliance with CGA circulars and guidelines.
- The final version of this document shall be uploaded to the CGA Portal **on or before 31 July 2025**, in accordance with the mandatory transition timeline.