

Play UK Internet N.V.

COMPLAINT HANDLING PROCEDURE

V. 1.0 - JULY 2025

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Revision History

Version#	Effective date	Approving official	Responsible officer	Next review date	Comments
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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 Player Complaints Policy Guidelines version 1.1. of June 18th 2025, 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.

The Company shall provide a Customer Support service equipped with adequate resources to promptly and effectively respond to Customers via phone and email.

2 DEFINITIONS

- **ADR:** Alternative dispute resolution ('ADR'), which is offered in accordance with the ADR policy as is to be issued by the CGA.
- **The Company:** Play UK Internet N.V., a limited liability company duly organized under Curacao law registered with the Chamber of Commerce and Industry in Curacao under number #95091
- **Customers:** Players who have opened an account on the Company's website and have been accepted as customers
- **Reportable Complaint:** When a Complaint Submission Form has been submitted by the Customer and/or a Complaint has been escalated to the ADR
- **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 selfexclusion, vulnerability of players, non-compliance with cooling-off or exclusion tools, or the failure of PlayUK to protect players at risk.
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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.
 - If the Complaint is initiated after this date, the Company can decide not to handle the Complaint, depending on the subject of the Complaint.
 - All Complaints regarding sports betting should be submitted as soon as possible. Due to the nature of the bet, delays may result in the unavailability of relevant data. Although the Customer may lodge a Complaint within six (6) months from the date of bet settlement, it is advised to take prompt action. The investigation regarding the Complaint may depend on the available data and the Company can't guarantee that all data is still available at that time.
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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

At first instance, Customer Complaints are handled by our customer support Team. Customers may contact the customer support team using the contact details made available on the website via email and/or live chat. If the first contact by the customer support team is not satisfactory, the Customer can file an official Complaint Submission Form, which will include the following information and which will be available in English and the language of the URL that the Customer is using:

- A. Customer's name, address and place of residence;
- B. Customer's account number or name;
- C. Date of the complaint and date of the disputed event;
- D. Description of the conduct being disputed;
- E. Amount in dispute.
- F. URL

Upon receiving this Complaint Submission Form, the Complaint becomes a Reportable Complaint. Depending on the nature of the Reportable Complaint, the designated customer support team member shall respond to the Customer.

The Company will provide the customer support function through a system designed to manage the support tickets, complaints, feedback and suggestions submitted by Customers. Initially, all customer support will be done through email, helpdesk chats and/or communication via telephone.

The Customer will receive a final conclusion of their Reportable Complaint, which can entail:

- A final assessment of the outcome/resolution of the Reportable Complaint;
- Detailed reasons for not handling the Reportable Complaint.

In case the Customer is not satisfied with the resolution and makes a further Complaint to that effect, the Customer can escalate the matter to an independent ADR entity. Once the Customer informs the Company about the desire to escalate the matter to the ADR, the Company will provide the details of the ADR.

4.2 Timeframe Responsible Gaming Complaint

If the Reportable Complaint by the Customer is related to responsible gaming, such as complaints about self-exclusion, cooling-off period, gaming addiction, then the Company will use its best efforts to resolve these cases within five (5) business days.

Within two (2) business days of receiving the Reportable Complaint, the Company will acknowledge receipt of the Complaint in writing, explain the process by which it will be handled, and inform the Customer of the average expected timeline for resolution.

In case more time is needed to make a reasonable and informed decision, the Customer will be informed about the delay. The Company commits to providing a response within two (2) weeks. However, if a delay is caused due to lack or slow response from the Customer, the resolution period may be extended by another two (2) weeks.

4.3 Timeframe other Complaints

Although the process is similar to responsible gaming complaints, the timeline is different.

Within one (1) week of receiving the Reportable Complaint, the Company will acknowledge receipt of the Complaint in writing, explain the process by which it will be handled, and inform the Customer of the average expected timeline for resolution.

In case more time is needed to make a reasonable and informed decision, the Customer will be informed about the delay. The Company commits to providing a response within four (4) weeks. However, if a delay is caused due to complexity, or lack or slow response from the Customer, the resolution period may be extended with another four (4) week

4.4 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

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4.6 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

5 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.

6 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.
- The Company will be engaging an independent ADR entity in Curaçao, approved by the CGA.
- The dispute resolution procedure at the ADR is free of charge, independent of the outcome. However, the Customer must first exhaust the Company's complaint procedure before the Customer can approach an ADR.
- A decision of an ADR entity is binding on both the Company and the Customer who submitted the Reportable Complaint. The Customer can only bring Reportable Complaints to an ADR if:
 - the value of the Reportable Complaint is more than EUR 5.000, - or
 - if the Reportable Complaint pertains to a Responsible Gaming complaint.

More specific details of the ADR procedure will be provided as soon as the CGA has published their ADR policy.

The ADR procedure does not eliminate the possibility for Customers to bring proceedings against the Company to any Curaçao Courts instead of opting for an ADR procedure.

7 ROLE OF THE CURAÇAO GAMING AUTHORITY (CGA)

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

- The CGA will not resolve or make decisions on any player complaints nor will act as an ADR/escalation entity as it does not mediate in individual disputes.
- CGA can be contacted by the Customer with regards of matters such as malpractice, breach of license conditions or whistle blowing

8 RECORDKEEPING AND REPORTING OBLIGATIONS

8.1 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:
 - the total number of submitted Reportable Complaint;
 - the total number of settled Complaints (whether upheld or rejected);
 - the number of pending or unresolved Complaints;
 - the number of Complaints per category (Responsible Gaming or other Complaints);
 - the number of Complaints referred to the ADR;
 - and the number and detail of Complaints for which the Customer has taken legal action
- 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.

9 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.

10 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

11 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.