

PLAYER DISPUTE RESOLUTION POLICY

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I. Scope

This Player Dispute Resolution Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK). Adherence to this policy is a regulatory requirement, and failure to comply will be addressed by the Curacao Gaming Authority (CGA) in accordance with its monitoring and enforcement procedures.

Brightstar N.V. is committed to maintaining the highest standards of integrity, fairness, and transparency in its gaming operations. This policy formalizes the procedures for addressing and resolving player complaints in a manner that upholds these principles and guarantees all players access to a clear and effective dispute resolution process, including free alternative dispute resolution (ADR) services provided by an independent entity.

A player has the right to submit a complaint free of charge regarding any part of their relationship with Brightstar N.V. or any incident related to their participation in a game of chance. To provide clarity and ensure a comprehensive understanding of the types of concerns that may be raised, complaints may relate, but are not limited to the following categories:

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues (which will be prioritized)

- Treatment of player balances
- KYC and verification procedures
- Data protection
- Technical or software issues
- Anti-Money Laundering (AML) concerns
- Underage gambling
- Fraudulent games or practices
- Licensing or regulatory issues

Players must lodge their complaints within six (6) months from the date of the incident in question. Complaints submitted outside of this period may not be eligible for review under this policy.

This document outlines the full resolution process, from initial complaint submission through internal review, escalation, and where necessary, referral to an independent ADR provider. The policy also defines the responsibilities of internal teams handling complaints and reinforces Brightstar N.V.'s commitment to confidentiality, timely response, and compliance with all applicable laws and regulations.

Brightstar N.V. further clarifies that while players may escalate complaints to an independent ADR provider, the CGA does not resolve or make decisions on individual gambling-related complaints. However, if a player believes that Brightstar N.V. is in breach of applicable regulations, they may notify the CGA via the online reporting form available on its official website.

II. Initial Complaint Submission: Customer Support

In the event of any disputes or issues arising from gameplay, payments, bonuses, account verification, or other aspects of the service, players may lodge a written complaint free of charge within six (6) months of the incident related to their participation in a game of chance. For specific cases such as peer-to-peer (P2P) games or ante post betting, the six-month period begins after the resolution of the relevant event.

Complaints must be submitted using a clearly defined methodology that includes either completing the online complaint form available on our website or submitting a completed downloadable complaint template (in Word or PDF format). These submission tools are prominently accessible on the operator's website and are referenced in the Terms and Conditions. Complaints may be submitted by email, including to support@spacefortuna1.com; however, in order for a complaint to be formally processed under this policy, it must be submitted using either the online form or the completed downloadable template.

Within one (1) week of receiving the complaint, Brightstar N.V. will confirm receipt in writing to the player. This initial acknowledgment will include:

- Confirmation that the complaint has been received;
- An explanation of how the complaint will be processed, including the steps and departments involved in reviewing the matter;
- The expected timeline for resolution, including the standard four-week timeframe and conditions under which this may be extended.

All complaints must include the following information:

- The player's full name, address, and place of residence
- The player's account number (if applicable)
- The date the complaint is being submitted
- A detailed description of the conduct being disputed (using predefined category topics where relevant)
- The preferred language for handling the complaint (English or the language of the target market)
- Any supporting documentation the player wishes to include (e.g., screenshots, transaction records)

Following the initial acknowledgment, Brightstar N.V. will assess and respond to the complaint within a maximum of four (4) weeks from the date of receipt.

If the complexity of the complaint or the need for additional information necessitates further investigation, this period may be extended once by up to an additional four (4) weeks. In such cases, the player will receive a written notice explaining the reason for the delay and the revised expected timeline for resolution.

If additional information or documentation is required to process the complaint, Brightstar N.V. will request this information within the initial four-week response period. If the player fails to provide the necessary information within this timeframe, Brightstar N.V. reserves the right to reject the complaint on the grounds that it cannot be properly assessed.

A final determination will be provided to the player in writing within the applicable timeframe. This response will include either a reasonable final assessment of the complaint and its resolution, or a detailed explanation of why the complaint could not be processed.

III. Handling of Responsible Gaming Complaints

Complaints specifically related to responsible gaming will be prioritized due to their potential impact on player well-being. Brightstar N.V. is fully committed to adhering to the Responsible Gaming policy established by the Curacao Gaming Authority (CGA).

Complaints categorized under responsible gaming (as defined in the "Reasons for Complaint" section of the CGA Player Complaints Policy) will be addressed promptly, with best efforts made to resolve these cases within five (5) business days.

In circumstances where additional time is required for resolution, the player will be notified clearly and promptly of the delay. Such extensions will not exceed two (2) weeks from the date the complaint was initially received.

IV. Internal Escalation Procedure

If the initial review by Customer Support indicates that further investigation is necessary, the complaint will be escalated to an appropriate internal team for review. Complaints may require specialized attention based on the nature of the issue, including but not limited to matters related to account verification, financial transactions, or security concerns.

Following a thorough internal review, the findings will be communicated back to the player via the Customer Support Team. In cases where additional documentation or information is required, the player will be notified. The internal review process will typically be completed within two business days.

V. Escalation to Compliance Department

If a resolution cannot be reached through the initial review process or internal escalation, the complaint will be referred to the Compliance department for further investigation. This step is reserved for more complex or unresolved cases, which may involve legal, regulatory, or contractual matters.

The team handling the escalation will conduct a final, comprehensive investigation, and all subsequent communication with the player will continue through Customer Support. If no satisfactory resolution is achieved, the player will be informed of the final decision and any options for external escalation.

VI. External Escalation: Independent Alternative Dispute Resolution (ADR)

If a satisfactory resolution cannot be achieved through Brightstar N.V.'s internal complaint resolution procedures (including initial review, internal escalation, and review by the Compliance Department), players may escalate their complaint to an independent Alternative Dispute Resolution (ADR) provider. This service is offered free of charge in compliance with the licensing conditions stipulated under the National Ordinance on Games of Chance (LOK).

Brightstar N.V. maintains an agreement with at least one ADR entity certified by the Curacao Gaming Authority (CGA). Players choosing to escalate their complaint to ADR will incur no costs, as all associated fees are borne by Brightstar N.V.

The contact details for the ADR provider will be clearly communicated to the player upon completion of the internal complaint review process and are also available in Brightstar N.V.'s Terms and Conditions.

Whether participation in the ADR process is mandatory prior to pursuing legal action is specified in Brightstar N.V.'s Terms and Conditions.

Players will also be informed of the potential implications of the ADR entity's decision, including how the outcome may impact on their rights regarding further legal or judicial action.

VII. Authority Escalation: Curacao Gaming Authority (CGA)

While the independent ADR provider is the mandated route for escalating individual transaction-related disputes that cannot be resolved internally, it is important to note that **the Curacao Gaming Authority (CGA) does not resolve or make decisions on complaints regarding gambling-related transactions.** The CGA **does not mediate** in individual disputes between players and operators.

However, if a player believes the operator is in breach of regulations, they may contact the Curacao Gaming Authority via an Online Form available on the CGA website. The CGA may use such information to support its supervisory activities.

Brightstar's complaint procedures and/or Terms and Conditions will make it clear to the player that the CGA does not mediate in individual disputes.

VIII. Record-Keeping

In compliance with regulatory requirements under Article 5.3 of the National Ordinance on Games of Chance (LOK), **Brightstar N.V. is required to maintain a log of all player complaints.**

This log serves as a record for regulatory oversight and internal review processes. The required log must include details of complaints, specifically categorized by their resolution status:

- Those **resolved internally**, including whether the complaint was upheld or rejected.
- Complaints that remain **unresolved**.
- Complaints that have been **escalated to an independent Alternative Dispute Resolution (ADR) provider**.
- Complaints that have been **escalated to legal proceedings**.

All such complaint records, including details of unresolved complaints and those escalated to ADR or legal proceedings, **must be securely maintained by Brightstar N.V. for a minimum period of five years.**

IX. Regulatory Reporting

In accordance with the requirements of the Curacao Gaming Authority (CGA) Player Complaints Policy, **Brightstar N.V. is required to submit summary reports on player complaints to the CGA.**

These reports provide the CGA with an overview of complaint activity for regulatory oversight purposes. The operator will submit these reports to the CGA **twice a year**, specifically on **January 15th and June 15th**.

The reports will summarize the following information regarding player complaints:

- **Total number of complaints made** within the reporting period.
- **Total number of complaints closed** within the reporting period, indicating how many were settled (upheld) and how many were rejected.
- **The number of pending or unresolved complaints** at the end of the reporting period.
- **The number of complaints categorized by type** (e.g., deposit issues, withdrawal issues, bonus terms, responsible gaming issues, etc.).

a mandatory part of the process and ensures that all cases can be reviewed for compliance, follow-up, and accountability.

Training also includes guidance on how to manage direct player conversations in a way that is respectful, discreet, and fully aligned with responsible gaming objectives. Brightstar N.V. views these conversations not only as interventions but as educational moments that help foster safer gaming behavior.

2. Escalation Protocols

When an employee identifies behavior indicative of problem gambling, the matter must be escalated promptly to the Compliance Officer for further review. The individual is responsible for assessing each case, reviewing the documented behavior, and determining whether additional interventions are warranted.

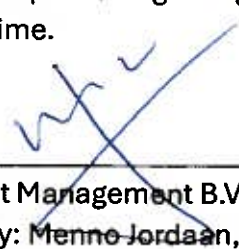
Possible outcomes of this review may include the application of deposit or session limits, the recommendation of a cooling-off period, temporary account restrictions, or mandatory self-exclusion in cases of extreme or repeated risk. Each step is taken with careful consideration of the player's well-being and with full documentation to ensure transparency and regulatory compliance.

Brightstar N.V. treats all escalations seriously and ensures that the chain of responsibility - from frontline staff to senior oversight, is clear, accessible, and consistently applied. These protocols reflect the company's commitment to preventing harm and maintaining a safe and responsible gaming environment.

X. Policy Conclusion

Brightstar N.V. is committed to upholding the highest standards of responsible gaming in accordance with the Curaçao Gaming Authority's regulatory framework. This policy reflects our ongoing dedication to player protection, risk-based oversight, and ethical operation.

We will continue to monitor industry developments, implement evolving best practices, and ensure that all responsible gaming measures are consistently applied, evaluated, and improved over time.



Starkeast Management B.V., Managing Director
Signed by: ~~Menno Jordaan~~, Managing Director
Date: May 9, 2025