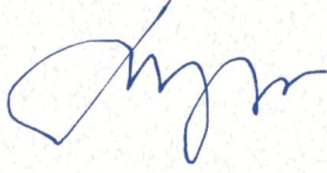


Luckywayz Limited B.V.

Player Complaints Policy

Policy Owner	Luckywayz Limited B.V.
Approver	Jelizaveta Jakuseva 
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Responsible for document management	Rudite Vege, MLRO
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1. Introduction

This Player Complaints Policy establishes the procedures and principles adopted by Luckywayz Limited B.V. to ensure that all player complaints are handled fairly, transparently, and in compliance with the National Ordinance on Games of Chance (LOK), Article 5.3, and related regulatory requirements as issued by the Curacao Gaming Authority (CGA).

Our goal is to offer players a streamlined dispute resolution pathway, including free access to independent Alternative Dispute Resolution (ADR) services, and to promote trust and accountability in all player interactions.

2. Scope of the Policy

This policy applies to all complaints submitted by players concerning:

- Game fairness
- Financial transactions (deposits, withdrawals, bonuses)
- Bonus terms and conditions
- Alleged errors or unfairness in game outcomes
- Treatment of player balances
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation
- Unfair terms and conditions
- Responsible gaming measures
- Account actions (suspensions, closures, restrictions)
- KYC and verification
- Data protection
- Technical and software issues
- Any other operational matters

Complaints relating to suspected breaches of regulation may be escalated to the CGA but are not directly mediated by the Authority.

3. Complaint Submission Process

3.1 Submission Timeline

Players may submit a complaint within **six (6) months** of the disputed event, or in the case of ongoing games/events (e.g. poker or ante-post betting), within **six (6) months** of the **event's final resolution**.

3.2 How to Submit a Complaint

Complaints can be submitted free of charge via email using the downloadable template: <https://tinyurl.com/2ctwu9pt>.

An official **Complaint Submission Form** must be available:

- As a downloadable document and/or an online web form
- In English and in the language of the website/domain used by the player

3.3 Information Required

Players must provide the following information in the complaint:

- Full name, address, and residence
- Account number (if applicable)
- Date of the complaint and date of the disputed event
- Description of the issue (selectable categories if available)
- Preferred communication language (English or language of the target market)
- Supporting documentation (if any)

Only the registered player may submit a complaint.

4. Complaint Handling Procedures

4.1 Acknowledgement

Within two **(2) calendar days** of receiving the complaint, the player shall receive:

- Written confirmation of receipt
- The explanation of how the complaint will be processed
- Notice of average timeline for resolution of complaints

4.2 Resolution Timeline

The complaints shall be resolved within the following timelines:

- Responsible Gaming complaints: Resolved within five **(5) business days**, extendable to two (2) weeks with notice
- General complaints: Resolved within four **(4) weeks**, extendable once for a further four (4) weeks if complexity or further data is needed

4.3 Final Determination

Upon thorough analysis of the complaint, players shall receive:

- A written response with reasoning and any supporting evidence
- Notice of rejection if the complaint is incomplete and further information was not provided within the time limit

If unresolved, the player will be advised of the right to escalate the complaint to ADR.

4.4 Use of AI

- AI **must not** handle complex complaints or those related to Responsible Gaming
- Use of AI must be monitored for consistency and fairness

5. Alternative Dispute Resolution (ADR)

5.1 Access and Availability

- We shall provide players with access to **independent ADR services**, free of charge
- An agreement with a CGA-Certified ADR provider shall be publicly available on our websites once the list of Certified ADR providers is available

5.2 Escalation Conditions

- If a complaint remains unresolved internally within the abovementioned term, players shall always be provided with the opportunity to escalate it to ADR
- The Player will be informed by Luckywayz Limited B.V. about the possibility of contacting the ADR.
- Use of ADR may be mandatory under our Terms & Conditions. Corresponding changes shall be brought to the Terms & Conditions
- Players may not submit to multiple ADRs for the same dispute
- Once initiated, a dropped ADR process cannot be reactivated

5.3 CGA Non-Mediation

Since the CGA does not resolve individual disputes, the players shall be provided with the opportunity to notify the CGA of suspected regulatory breaches via the CGA's official online form. The corresponding link shall be kept in the Terms & Conditions and in a public Complaints policy.

6. Record-Keeping and Compliance Reporting

6.1 Record Retention

We maintain a secure log of all complaints, including:

- Internally resolved complaints (upheld/rejected)
- Unresolved complaints
- ADR escalations
- Legal proceedings

These records are retained for **five (5) years**.

6.2 Bi-Annual Regulatory Reports

We submit reports to the CGA on:

- **January 15 and June 15** annually
- Reports include:
 - Total complaints received
 - Complaints resolved, pending, or escalated
 - Complaint categories and outcomes
 - Legal actions initiated by players
 - Number referred to ADR

The first reports become due in January 2026.

7. Website and Terms Integration

This policy shall be:

- Published as a standalone document on our website
- Summarized clearly in our Terms and Conditions

The following will be included:

- Complaint submission details and links
- Expected timelines
- ADR rights and implications
- CGA's non-mediatory role

8. Contact Information

For complaint submission or further assistance:

- Email: compliance@luckywayz.com
- Complaint Form: <https://tinyurl.com/2ctwu9pt>

For CGA regulatory complaints:

- Online form available at [the link will be updated once CGA releases its online form]

Player Complaint Form

Operator Name: Luckywayz Limited B.V.

Email (attach this completed form to compliance@luckywayz.com)

1. Player Information

- **Full Name:** _____
- **Residential Address:** _____
- **City/Country:** _____
- **Email Address:** _____
- **Phone Number (optional):** _____
- **Account Username/ID (if applicable):** _____

2. Complaint Details

- **Date of Incident:** _____
- **Date of Complaint Submission:** _____
- **Category of Complaint:**
 - ☐ Game fairness
 - ☐ Financial transactions (deposits, withdrawals, bonuses)
 - ☐ Bonus terms and conditions
 - ☐ Alleged errors or unfairness in game outcomes
 - ☐ Treatment of player balances
 - ☐ AML concerns
 - ☐ Issues with minors
 - ☐ Fraudulent games

- ☐ Fraudulent practices
- ☐ License or regulation
- ☐ Unfair terms and conditions
- ☐ Responsible gaming measures
- ☐ Account actions (suspensions, closures, restrictions)
- ☐ KYC and verification
- ☐ Data protection
- ☐ Technical and software issues
- ☐ Any other operational matters
- ☐ Other (please specify): _____

- **Detailed Description of the Complaint (please include relevant facts, dates, and interactions):**

3. Supporting Documentation

Please attach any relevant documents (screenshots, emails, receipts, etc.)

Documents Attached:

4. Language Preference for Communication:

- ☐ English
- ☐ [Insert preferred language for communication - _____]

5. Declaration

I confirm that the information provided in this complaint is accurate and complete to the best of my knowledge.

Signature (if printed): _____

Date: _____