

Player Complaints & Dispute Resolution Policy - Version 1.2

Version 1.2	8 th December 2025	Added Definitions, Complaint Window, Alternative Dispute Resolution, Role of CGA, Reasons for Complaint, T&Cs
Version 1.1	8 th August 2025	Truncated Version of Original
Version 1.0	7 th August 2025	Original

1. Policy Statement

Zozo Technology B.V. (the “Company”) is committed to maintaining fair, transparent, and timely handling of all player complaints and disputes, in compliance with Curaçao Gaming Authority (CGA) regulations. We aim to ensure that all concerns raised by players are treated with professionalism and resolved promptly. This policy guarantees players access to a straightforward, effective, and free complaints and dispute resolution process.

2. Purpose

This policy establishes a formal framework for managing, investigating, and resolving player complaints and disputes in line with Curaçao licensing requirements. It ensures compliance with the CGA directives and demonstrates the Company's commitment to protecting player rights.

3. Scope & Applicability

This policy applies to all employees, contractors, affiliates, payment processors, and third-party vendors involved in the Company's gaming operations and player interactions.

4. Definitions

- **Player Interaction:** Any written communication initiated by a player directed to the Company's customer service team, including obligations to maintain clear requests for assistance, information, or clarification.
- **Complaint:** A written expression of dissatisfaction by a player relating to the Company's services, decisions, terms, or conduct, where the player expects a response or resolution.
- **Dispute:** A complaint handling procedure that has not been resolved to the player's satisfaction through the internal complaints process and escalation paths for unresolved disputes. has been escalated either internally or to an independent third party (ADR).

5. Complaint Window

Players may lodge a complaint free of charge within **six (6) months** of the settlement of the bet or the incident giving rise to the complaint.

For peer-to-peer (P2P) games such as poker, the six-month period begins after bet settlement or event conclusion. For in-running betting, players are advised to act promptly, as data may no longer be available after a reasonable period.

6. Regulatory Framework

This policy aligns with Curaçao Gaming Authority (CGA) guidelines, including obligations to maintain clear complaint handling procedures and escalation paths for unresolved disputes.

7. Complaint Submission Channels

Players may submit complaints using the following channels:

- Email: legal@jb.com
- In-Platform Complaint Form: Accessible via the player dashboard
- Customer Support: support@jb.com

An official Complaint Submission Form is available online and for download. The form requires at minimum:

- Player's full name, address, and place of residence
- Account number or username, transaction IDs, and a description
- Date of the complaint and date of the disputed event
- Description of the issue. (with category selection if applicable)
- Supporting documentation as reasonably requested

The Complaint Submission Form is available in English and in the language of the player's chosen website domain.

8. Complaint Handling Process

The Company follows a structured approach to ensure complaints are handled consistently and transparently:

1. Acknowledgement: Complaints are acknowledged in writing within 24 hours and assign a unique case reference number.
2. Assignment: Each case is assigned to the Player Support team or a designated Compliance Officer.
3. Investigation: The complaint is investigated thoroughly, including transaction and account reviews. review of transactions, accounts, and any supporting documentation.
4. Initial Response:
 - a. Responsible Gaming complaints: response within 2 business days.

- b. Other complaints: acknowledgement within 1 week, resolution within 4 weeks (extendable once by an additional 4 weeks if justified).
5. Final Determination: A written outcome is provided to the player, including supporting evidence or reasons for non-resolution.

9. Dispute Resolution Procedure

If the player is unsatisfied with the proposed resolution:

- The complaint will be escalated internally to the Compliance Officer for independent review.
- A final written response will be issued within 7 additional business days.
- All steps taken and findings are documented for regulatory purposes.

10. Alternative Dispute Resolution

The Company is required to offer players access to free, independent ADR services. Once the CGA publishes its list of Certified ADR Providers, the Company will engage at least one approved provider and update this policy and its Terms & Conditions accordingly.

Players will be able to escalate unresolved complaints to ADR, free of charge, and the operator will bear all costs of the ADR process. ADR outcomes will be respected in line with Curaçao law.

11. Role of the Curaçao Gaming Authority

The CGA does not resolve or mediate individual disputes between players and operators. Players may contact the CGA directly if they believe the Company has breached regulations, license conditions, or engaged in malpractice. The CGA will use complaint information for supervisory and enforcement purposes but will not adjudicate gaming-related disputes.

12. Crypto-Specific Considerations

As the Company supports cryptocurrency transactions, additional procedures apply:

- Tracking of deposits and withdrawals via transaction IDs.
- Use of blockchain analytics to verify transaction integrity.
- Investigation of failed deposits, delayed confirmations, or suspected wallet compromise.
- Enhanced review of chargebacks or payment reversals involving crypto gateways.

13. Record-Keeping and Reporting Obligations

The Company maintains detailed logs of all complaints, investigations, and resolutions for a minimum period of five (5) years, or as otherwise required by law.

Biannual reports will be submitted to the CGA on January 15 and June 15, summarising:

- Number of complaints received, upheld, and rejected
- Pending/unresolved complaints
- Complaints by category
- Complaints escalated to ADR or legal action

14. Training & Awareness

All employees involved in player interactions receive regular training on complaint handling procedures, escalation protocols, dispute resolution best practices, and Curaçao reporting obligations. Training includes crypto-related investigations.

15. Reasons for Complaint

Players may submit complaints on any aspect of their relationship with the Company, including (but not limited to):

- Deposits or withdrawals
- Bonus terms and conditions
- Account closures or restrictions
- Game fairness or errors
- Responsible Gaming concerns
- Player balances
- KYC and verification
- Data protection and privacy
- Technical or software issues
- AML concerns
- Fraudulent games or practices
- Regulatory or license breaches
- Unfair terms and conditions

16. Terms & Conditions

This Complaints Policy is incorporated into the Company's Terms & Conditions.

Clear links to this policy are provided on the website homepage and registration page. Players are required to confirm acceptance of the Complaints Policy during registration.

17. Contact Information

For complaints, disputes, or inquiries, please contact:

Compliance Officer

Email: legal@jb.com