

Player Complaints Policy

1. Purpose

This Player Complaints Policy (“**Policy**”) outlines how the Company handles complaints from players in a transparent, timely and fair manner. This is in accordance with Article 5.3 of the LOK and the Curaçao Gaming Authority’s Player Complaints Policy Guidelines Version 1.1 (June 2025).

The objective is to ensure players have access to an understandable “end-to-end” complaints process, with escalation to independent alternative dispute resolution (ADR) where appropriate, and to maintain records and report to the CGA.

2. Definitions

- **Player Interaction** – Any written communication initiated by a player directed to our customer support team, including feedback, enquiries, clarifications or assistance requests.
- **Complaint** – A written expression of dissatisfaction by a player relating to services, decisions, terms or conduct of the Company, where the player expects a response or resolution.
- **ADR Provider** – An independent, CGA-certified alternative dispute resolution provider to which a player may escalate a complaint if not satisfied with our internal resolution.

3. Scope

This Policy applies to all players who hold an account with the Company and all complaints related to our gaming services, including but not limited to:

- withdrawals and payment issues;
- account restrictions, suspensions or closures;
- game fairness and technical integrity;
- bonus or promotional disputes;
- responsible-gaming/self-exclusion issues;
- system errors or malfunctions;
- other services provided to players.

4. Availability & Publication

- The complaints procedure shall be clearly referenced in our Terms & Conditions and also published on our website and/or gaming interface.
- The complaints-procedures page shall be accessible from any registration or login screen, in English and in any other language used by our target market.
- The player shall be made aware of any changes to the complaints procedure via first login after such changes and via email, where appropriate.

5. Complaint Handling Procedure

Stage 1 – Internal Complaint Submission

- The player may submit a Complaint by completing our official Complaint Submission Form (available online) or by email to playerrelations@gameszapped.com.

- We will acknowledge receipt of the Complaint within 2 working days (or sooner if indicated in our communications).
- For complaints relating to responsible-gaming issues (e.g., self-exclusion breaches), we will aim to resolve the matter within 5 business days from receipt.
- For all other complaints, we will aim to complete investigation and provide our response within 4 calendar weeks from receipt. If we need more time due to complexity, and we notify the player in advance, an extension of up to an additional 4 weeks may apply.
- During the investigation the player shall be kept informed of progress at least weekly.

Stage 2 – Escalation to ADR

- If the player remains unsatisfied with our final internal decision, the player may escalate the case free of charge to a CGA-certified ADR provider. We will provide the relevant contact details in our final decision letter once the CGA issues a list of certified ADR provider.
- The ADR provider's decision shall be binding on the Company if the player accepts it, and we agree to implement it.
- We will co-operate fully with the ADR process, provide all requested documentation and comply with the outcome if accepted by the player.

6. Time Limits for Submissions

- A player may submit a formal Complaint within 3 calendar months after the date of the incident or decision giving rise to the Complaint.

7. Records, Reporting & Monitoring

- We shall maintain complete records of all Complaints, acknowledgements, investigations, decisions and any ADR escalations for at least five (5) years.
- We shall compile a Complaints Report at least bi-annually (every six months) summarising:
 - total number of Complaints received;
 - number of Complaints resolved internally;
 - number of Complaints escalated to ADR;
 - average time to resolution (internal and ADR);
 - outcome categories;
 - any patterns or systemic issues identified.
- We will submit the Complaints Report to the CGA when requested, in line with our reporting obligations.
- We shall review complaints data to identify root-causes, improve processes and reduce recurrence.

8. Communications with Players

- Our communications shall be clear, professional and courteous. We shall reference the relevant section of the Terms & Conditions, the cause of the issue, our rationale for the decision and the player's right to escalate.

- Final correspondence shall include: the complaint reference number; date of receipt; summary of the issue; our decision; how to appeal/escalate; the ADR provider's details; and time-limit for escalation.

9. Confidentiality

- All complaints are treated as confidential. We will protect the personal data of players and any third-party individuals involved, in line with our Data Protection Policy.
- Information shared with ADR or regulatory bodies may be done under confidentiality arrangements as required.

10. Training & Staff Responsibility

- All staff involved in handling complaints shall receive training on this Policy, on players' rights, the Company's obligations under the LOK and CGA guidelines, and on the correct escalation procedures.
- Staff shall have the authority to refer issues to appropriate management/specialist departments (e.g., payments, technical, legal) as needed.

11. Review & Amendment

- This Policy shall be reviewed at least annually or sooner if there is a change in law/regulation, CGA guidance or our business model.
- Any amendments shall be approved by senior management and communicated to players via our website where required.

12. Enforcement & Non-compliance

- Failure to comply with this Policy may result in regulatory enforcement by the CGA, reputational damage to the Company and may breach our obligations under the licence.
- The Company will take appropriate disciplinary or corrective action if non-compliance is identified.