

Player Complaints Policy

Right5 Online N.V.

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Player Complaints Policy

1. Introduction and Purpose

Right5 Online N.V. (hereinafter referred to as the "Company") places the utmost importance on fostering a positive and trustworthy relationship with its valued players. We are dedicated to ensuring a consistently high standard of service and a fair and transparent gaming environment on our online gaming platform (hereinafter referred to as the "Platform"). Recognizing that occasions may arise where players experience concerns or dissatisfaction with our services, the Company has established this comprehensive Player Complaints Policy (hereinafter referred to as the "Policy"). This Policy serves as a formal framework for receiving, investigating, and resolving player grievances in an efficient, impartial, and satisfactory manner.

This detailed Player Complaints Policy meticulously outlines the step-by-step process that players of the Platform must follow when submitting a complaint. Furthermore, it clearly articulates the internal procedures that the Company will adhere to when investigating and diligently working towards a resolution for each complaint received. Our aim is to ensure that every player concern is given due consideration and addressed with the seriousness and attention it deserves.

The overarching purposes of this Policy are multifaceted and include:

- i. To establish a clear, easily understandable, and readily accessible framework that guides players through the process of submitting complaints and provides transparency regarding how their concerns will be handled by the Company.
- ii. To guarantee that all player complaints, regardless of their nature, are treated with the utmost seriousness, subjected to thorough and objective investigation, and ultimately resolved in a fair and equitable manner that aligns with our commitment to player satisfaction and regulatory compliance.
- iii. To facilitate open and effective communication channels between the Company and the player throughout the entire lifecycle of the complaint resolution process, ensuring that players are kept informed of the progress and outcome of their complaint.
- iv. To foster a culture of continuous improvement within the Company by actively learning from the feedback and insights gained through player complaints. This allows us to identify areas for enhancement in our services, processes, and overall player experience.
- v. To ensure full compliance with all applicable legal and regulatory requirements governing the online gaming industry, as well as to adhere to the highest standards of best practices in player protection and dispute resolution.

2. Scope of the Policy

a. This Player Complaints Policy is designed to be inclusive and applies to all individuals who have successfully registered an account and actively participate in the online gaming services offered on the Platform. It covers a broad spectrum of potential grievances or complaints that a player may have experienced in relation to any aspect of the Company's operations and service provision, including but not limited to:

- i. Issues pertaining to the functionality, fairness, or technical performance of any of the games offered on the Platform, including concerns about game outcomes, software glitches, or unexpected interruptions.

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- ii. Matters related to the management of player accounts, encompassing the registration process, identity verification procedures, the handling of deposits and withdrawals of funds, account security, and any restrictions or closures applied to an account.
- iii. Disputes arising from bonus offers, promotional campaigns, and the interpretation or application of their associated terms and conditions, including wagering requirements, eligibility criteria, and payout limitations.
- iv. Concerns regarding the quality of interactions with the Company's customer support channels, including response times, the helpfulness and accuracy of information provided, and the professionalism of support agents.
- v. Issues related to the accessibility and overall usability of the Platform, including website navigation, mobile compatibility, and any technical barriers that may hinder a player's ability to access and utilize the services.
- vi. Concerns pertaining to the responsible gaming tools and features provided by the Company, such as self-exclusion options, deposit limits, and reality check functionalities, and their effectiveness or implementation.
- vii. Any other matter that directly impacts a player's experience while using the Platform and the services provided by the Company.

b. While the Company is committed to addressing legitimate player concerns, this Policy is not intended to cover disputes that may arise between individual players themselves. Additionally, the Company reserves the right to not entertain or further investigate complaints that are deemed to be frivolous, intentionally vexatious, based on demonstrably unfounded allegations, or are clearly abusive or inappropriate in nature. In such instances, the Company may, at its discretion, close the complaint without further action, while always maintaining professional communication with the player regarding this decision.

3. Principles of Complaint Handling

- a. **Accessibility:** The Company is dedicated to ensuring that comprehensive information regarding this Player Complaints Policy and the detailed procedures for submitting a complaint are readily and easily accessible to all players. This information will be prominently displayed on the Platform, typically within the "Support," "Help," or "Terms and Conditions" sections, as well as on the Company's official website, ensuring that players can easily find and understand the process should the need arise.
- b. **Impartiality:** To maintain the integrity of the complaint resolution process, the Company guarantees that all complaints received from players will be handled in a completely objective and unbiased manner. Investigations will be conducted without any preconceived notions or prejudice towards either the player who submitted the complaint or any employee or representative of the Company. Our focus is solely on a fair and thorough assessment of the facts presented.
- c. **Confidentiality:** The Company recognizes the sensitive nature of personal information that may be shared by players during the complaint process. Therefore, we are committed to treating all such information with the utmost confidentiality and in strict adherence to the principles outlined in the Company's comprehensive Privacy Policy and all relevant data protection regulations. We will only use the information provided for the purpose of investigating and resolving the complaint.
- d. **Timeliness:** The Company understands the importance of addressing player concerns promptly. We are committed to acknowledging the receipt of complaints and initiating the investigation process as quickly and efficiently as reasonably possible, adhering to the specific timeframes outlined later in this Policy. While the complexity of a complaint may influence the overall resolution time, we strive to keep delays to a minimum and keep the player informed of any anticipated extensions.
- e. **Thoroughness:** Every complaint received will be subjected to a meticulous and comprehensive investigation. This will involve a careful consideration of all relevant information and evidence provided by the player, as well as any information gathered internally by the Company, such as account records, game logs, communication history, and statements from relevant personnel. Our goal is to gain a complete understanding of the issue before reaching a conclusion.

- f. **Fairness:** The Company is fundamentally committed to reaching resolutions to all legitimate player complaints that are fair and equitable. This involves a careful evaluation of the specific circumstances surrounding each case, a thorough application of the Company's terms and conditions, relevant regulatory requirements, and a genuine consideration of the player's perspective and the impact of the issue.
- g. **Record Keeping:** To ensure accountability, facilitate internal reviews, and comply with regulatory obligations, the Company will maintain detailed and accurate records of all player complaints received. These records will include comprehensive documentation of the investigation process undertaken, all communication exchanged with the player, and the final resolution reached for each case. This meticulous record-keeping allows us to track trends, identify areas for improvement, and demonstrate our commitment to fair complaint handling.

4. Complaint Submission Process

a. To ensure that all complaints are properly documented, efficiently tracked, and promptly addressed, players who wish to lodge a formal complaint are required to submit their grievance through the following designated communication channels:

- h. **Email:** Players can submit a detailed written account of their complaint via electronic mail to the dedicated complaints handling email address. This method allows players to articulate their concerns comprehensively and attach any supporting documentation.
- i. **Online Contact Form:** The Platform may also feature a specific online contact form designed for the submission of complaints. This form, typically located within the "Support" or "Contact Us" section of the Platform, provides a structured way for players to provide the necessary information.

b. To facilitate an efficient and effective investigation, all complaints submitted through the designated channels must include the following essential information:

- I. **Player Account Details:** The player's full legal name as registered on the Platform, their unique username, and their specific player account identification number. This ensures accurate identification of the player and their account history.
- II. **Date and Time of the Issue:** A precise indication of when the incident or issue that the subject of the complaint is occurred. Providing specific dates and times is crucial for accurate record retrieval and investigation.
- III. **Detailed Description of the Complaint:** A clear, concise, and factual narrative of the issue experienced. This description should include all relevant details, such as the names of specific games involved, any applicable bonus codes or promotional offers, relevant transaction identification numbers, and a summary of any prior communication with the customer support team regarding the issue.
- IV. **Supporting Documentation:** Any relevant evidence that supports the player's complaint. This may include screenshots of game outcomes, transaction history records, copies of email correspondence with customer support, or any other documents that can help substantiate the claims made in the complaint.
- V. **Desired Resolution:** A clear and specific statement outlining what the player expects the Company to do to resolve the complaint. This could include a request for a refund, the crediting of a bonus, a correction of an account balance, or any other action the player deems appropriate.
- VI. **Contact Information:** A current and valid email address and a telephone number where the player can be reliably contacted by the Company for further information, clarification, or updates regarding the complaint.

c. The Company reserves the right to request additional information or documentation from the player if, during the course of the investigation, it is deemed necessary to gain a more complete understanding of the issue. Failure to provide the requested information in a timely manner may, regrettably, lead to delays in the complaint resolution process or may hinder the Company's ability to fully investigate the matter.

d. To ensure proper handling and tracking, complaints that are submitted through communication channels other than the specifically designated methods outlined in Section 4.a may not be processed in a timely manner or may, in some cases, not be processed at all. Players are therefore strongly encouraged to utilize the official complaint submission channels to ensure their concerns are properly registered and addressed.

5. Complaint Handling Procedure

- a. **Acknowledgement of Receipt:** Upon successful receipt of a player complaint through one of the designated channels, the Company will promptly acknowledge receipt of the complaint. This acknowledgement will be sent via email to the player's registered email address within [Specify Timeframe, e.g., 48 business hours] of receiving the complaint. The acknowledgement email will include a unique complaint reference number, which the player should use in all future communication with the Company regarding this specific complaint.
- b. **Initial Assessment and Investigation:**
 - i. The Company's dedicated and trained Complaints Handling Team will conduct an initial assessment of the submitted complaint to determine its validity, clarity, and overall scope. This initial review helps to categorize the complaint and assign it to the appropriate investigator.
 - ii. Following the initial assessment, a thorough and impartial investigation will be launched. This investigation may involve a detailed review of the player's account activity, relevant game logs and transaction records, historical communication records between the player and the Company (including customer support interactions), and any other data or information deemed pertinent to the complaint.
 - iii. During the course of the investigation, the Company's Complaints Handling Team may find it necessary to contact the player directly, typically via email or telephone, to seek further clarification on specific aspects of the complaint or to request additional information or documentation that may aid in the investigation process. Player cooperation in providing timely and accurate responses to such requests is greatly appreciated.
 - iv. The entire investigation process will be conducted with the utmost impartiality and objectivity. The assigned investigator will meticulously gather and analyze all available evidence to form an unbiased understanding of the situation, without any preconceived judgments or favoritism.
- c. **Communication and Updates:** The Company recognizes the importance of keeping players informed about the progress of their complaint. Therefore, the Complaints Handling Team will endeavor to provide the player with updates on the status of the investigation at reasonable intervals. The frequency and method of these updates (e.g., email, telephone) will be determined based on the complexity of the complaint and the current stage of the investigation process. We aim to maintain open and transparent communication throughout.
- d. **Resolution and Response:**
 - i. Upon the conclusion of the thorough investigation, the Complaints Handling Team will carefully analyze all the gathered information and formulate a proposed resolution to the complaint. This proposed resolution will be based on the findings of the investigation, the Company's terms and conditions, and relevant regulatory requirements.
 - ii. The player will be formally notified of the outcome of the investigation and the details of the proposed resolution in a clear, comprehensive, and written response that will be sent via email to their registered email address. This response will include:
 1. A concise summary of the original complaint as understood by the Company.
 2. A detailed description of the investigation process that was undertaken, including the key steps and information sources reviewed.
 3. A clear articulation of the findings of the investigation and the factual basis for the Company's conclusions.
 4. A statement of the proposed resolution offered by the Company, which may include specific actions to be taken, or a clear explanation of the reasons why the complaint was not upheld if the investigation did not find sufficient grounds to support the player's claim.
 5. Explicit information regarding the player's right to escalate the complaint further within the Company's internal structure if they are not satisfied with the proposed resolution, as detailed in Section 6 of this Policy.

- e. **Timeframe for Resolution:** The Company is committed to resolving all player complaints in a timely manner. Our target is to reach a resolution for the majority of complaints within, from the date of initial receipt. However, it is important to acknowledge that some complaints may involve more complex issues that require a more extensive investigation. In such instances where a longer timeframe is anticipated, the player will be promptly informed of the reasons for the delay and provided with a realistic estimate of the expected timeframe for reaching a final resolution.

6. Escalation Process

- a. Recognizing that a player may not always be fully satisfied with the initial resolution proposed by the Company's Complaints Handling Team, this Policy provides a clear pathway for the player to escalate their complaint to a higher level of review within the Company's organizational structure. This escalation process ensures that unresolved concerns receive further attention from senior management.
- b. To initiate the escalation of a complaint, the player must, within [Specify Timeframe, e.g., 7 calendar days] of receiving the initial resolution email from the Complaints Handling Team, send a reply to that email. This reply must clearly and explicitly state the player's reasons for their continued dissatisfaction with the proposed resolution and should include any additional information or arguments that the player believes are relevant to their case and were not previously considered.
- c. Upon receiving a request for escalation, the complaint will be forwarded to a senior member of the Company's management team or a specifically designated Escalation Officer. This individual will undertake a thorough review of the original complaint, the detailed investigation process that was conducted by the Complaints Handling Team, and the rationale behind the initial proposed resolution. The Escalation Officer will approach the review with a fresh perspective and ensure that all aspects of the case have been adequately considered.
- d. The designated Escalation Officer will aim to provide a final decision on the escalated complaint within [Specify Timeframe, e.g., 10 business days] of receiving the player's escalation request. This final decision, which will represent the Company's ultimate internal resolution, will be communicated to the player in writing via email. The final decision will clearly state the outcome of the escalated review and the reasons supporting it.

7. External Dispute Resolution

- a. While the Company is committed to resolving player complaints internally to the satisfaction of all parties, we acknowledge that there may be instances where a player remains dissatisfied even after exhausting the Company's internal complaint handling and escalation procedures. In such rare circumstances, the player may have the option to refer their complaint to an independent third-party dispute resolution service.
- b. Right5 Online N.V. may be subject to specific regulatory requirements within the jurisdiction of Curaçao regarding the provision of access to external dispute resolution bodies. Information about the relevant accredited or approved external dispute resolution service or services that the Company is affiliated with or required to utilize will be readily available on the Company's website, typically within the "Dispute Resolution" or "Regulatory Information" sections, or will be provided to the player upon their specific request.
- c. Players who choose to pursue external dispute resolution are strongly advised to familiarize themselves with the specific procedures, rules, and timelines established by the relevant external dispute resolution service. The Company is committed to cooperating fully and in good faith with any such external dispute resolution process initiated by a player.

8. Record Retention

To ensure compliance with legal and regulatory requirements, as well as for internal auditing and quality assurance purposes, the Company will maintain comprehensive records of all player complaints that are received. These records will include detailed documentation of the initial complaint, all steps taken during

the investigation process, all communication exchanged with the player, and the final resolution reached for each complaint. These records will be securely retained for a period of [Specify Retention Period, e.g., five years] from the date on which the complaint was formally resolved.

9. Policy Review and Updates

- a. The Company is committed to maintaining a fair and effective Player Complaints Policy. To ensure its ongoing relevance, clarity, and compliance with evolving regulations and industry best practices, this Policy will be reviewed and assessed periodically by the Company's management. This review will take into account feedback received from players and any changes in legal or regulatory requirements.
- b. The Company reserves the right to amend, modify, or update this Player Complaints Policy at any time as deemed necessary. Any changes or revisions to this Policy will be promptly published on the Platform and the Company's official website. The effective date of the Policy will be clearly updated to reflect the most recent changes. Players are therefore encouraged to review this Policy periodically to stay informed of any updates or modifications that may have been implemented.

10. Contact Information

For any questions, clarifications, or further information regarding this Player Complaints Policy or the detailed complaint submission process, players are encouraged to contact the Company's dedicated Customer Support team. The contact details for the Customer Support team, including email addresses, telephone numbers (if applicable), and any live chat functionalities, can be readily found within the "Support" or "Contact Us" section of the Platform. Our Customer Support team will be able to provide general guidance and direct players to the appropriate resources.

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