

Player Complaints Policy  
of Gareton B.V.  
Version 1.1

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## **1. Introduction**

This Player Complaints Policy (the “Policy”) outlines the procedures for receiving, processing, and resolving player complaints by Gareton B.V. (the “Company”). It has been developed in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

The Policy applies to all complaints received from players regarding their interactions with the Company and any aspect of participation in games of chance.

## **2. Procedure for Complaints (Incidents)**

### **2.1. Definition of a Complaint (Incident)**

A complaint (incident) is any event, action, omission, or system behavior that, in the opinion of the player, has negatively impacted their participation in a game of chance or their relationship with the Company.

The list of reasons for complaints includes, but is not limited to:

- Issues with deposits, withdrawals, or transaction failures;
- Disputes over bonuses, game results, or bet settlements;
- Account suspensions, closures, or restrictions;
- Technical malfunctions affecting gameplay or access;
- Breaches of data protection or Responsible Gaming obligations;
- Suspected unfair treatment or non-compliance with terms and regulations.

### **2.2. Submitting a complaint**

Players may file a complaint free of charge within six (6) months of the incident that gave rise to the complaint. In the case of P2P games or ante post fixed odds betting, the six-month period begins after the outcome of the relevant event.

When submitting a complaint directly to the Company, the player may, at their discretion, inform the Company if the same matter is simultaneously being reviewed or has been escalated to a third party, such as an ADR entity, a regulator, or a legal representative. This information is provided for transparency purposes only and does not affect the player’s right to pursue any available remedies.

In the first instance the complaint can be submitted by the player through customer support channel (via email or live chat), or the player has the

opportunity to submit the complaint through the official “Complaints” tab on the website, which provides an online form for complaint submission.

Complaints must include:

- Player’s full name, address, and place of residence;
- E-mail address;
- Date of complaint;
- Description of the issue (including applicable category, if relevant);
- Preferred language;
- Supporting documentation (if relevant);
- Type of the complaint.

Complaint online form is also linked in the Terms and Conditions.

### 2.3. Acknowledgement of a Complaint

The Company confirms receipt of the complaint within 7 days, including:

- Confirmation of receipt;
- Provision of the explanation how the complaint will be processed;
- Expected timeline for resolution.

### 2.4. Resolution of a complaint

Complaints shall be resolved within 4 weeks.

If additional time is needed due to complexity or missing data, the timeline may be extended by 4 additional weeks, with written notice to the player.

The final response shall include:

- A detailed explanation and outcome;
- Or justification for declining the complaint.

### 2.5. Responsible Gaming complaints

Responsible Gaming complaints are handled with the highest priority. The Company ensures timely resolution of such complaints in accordance with responsible gambling practices.

## **3. Alternative Dispute Resolution (ADR)**

If the complaint is not resolved to the player’s satisfaction it may be escalated to a certified ADR provider, with whom the Company will conclude an agreement as soon as the list of certified ADR appears, free of charge.

ADR contact details are included in Terms and Conditions and on the website.

#### **4. Escalation to the Curaçao Gaming Authority (CGA)**

Players who believe the Company has breached regulatory obligations may report this via the CGA's Online Form.

The CGA will not resolve or make decisions on complaints regarding gambling-related transactions.

#### **5. Record-Keeping and Reporting**

All complaints are logged and stored by the Company for at least 5 years.

Reports are submitted by the Company twice annually (Jan 15 and June 15) to the CGA, including:

- Total number of complaints made;
- Total number of complaints closed (settled and rejected);
- Number of pending or unresolved complaints;
- Number of complaints by category;
- Number referred to ADR and the subsequent outcomes of each;
- Number and detail of complaints for which a player has taken legal action.