

Ex Lux N.V.– Player Complaints Policy

Effective Date: 10 October 2025

1. Policy Overview

This Player Complaints Policy outlines the procedures for lodging, managing, and resolving player complaints in a fair, transparent, and timely manner. It complies with Article 5.3 of the National Ordinance on Games of Chance (“LOK”) and the guidelines of the Curaçao Gaming Authority (CGA).

Ex Lux N.V., ensures that all players have free access to a structured complaints resolution framework, including escalation to an independent Alternative Dispute Resolution (ADR) entity. This policy will be incorporated into our Terms and Conditions and published as a standalone document on our website upon approval.

2. Definitions

- **Player Interaction:** Any communication initiated by a player, including questions, requests, or concerns.
- **Complaint:** A formal written expression of dissatisfaction about our services or conduct that requires a response.
- **Dispute:** A complaint that remains unresolved after internal escalation and is referred to an ADR provider or legal process.

3. Complaint Submission Process

3.1 Time Limits

- Complaints must be submitted within **six (6) months** of the incident or settlement of the wager.
- For real-time or peer-to-peer games, prompt reporting is recommended due to potential data limitations.

3.2 Submission Methods

1. Only the **registered account holder** may submit a complaint.
2. Complaints can be initiated via:
 - Customer support (email or live chat)
 - **Official Complaint Submission Form**, available:
 - As a downloadable PDF
 - Via our online portal
3. Required information:
 - Full name and contact details
 - Account ID
 - Date of the incident

- Detailed description of the issue
- 4. The form is available in English and the primary language of the player's domain.
- 5. We may request supporting documents where necessary.
- 6. Players will always be informed of their right to escalate to ADR.

3.3 Role of the CGA

- The CGA **does not** resolve individual complaints.
- It may intervene in cases of regulatory non-compliance or malpractice.
- CGA decisions are final unless the issue was improperly handled by the operator or ADR.

4. Complaint Resolution Process

4.1 Responsible Gaming Complaints

- **Acknowledgment:** Within **2 business days**
- **Resolution:** Within **5 business days**
- **Extension:** Only if delayed by the player, with a maximum extension of **2 additional weeks**

4.2 All Other Complaints

- **Acknowledgment:** Within **7 calendar days**
- **Resolution:** Within **4 weeks**
- **Extension:** Up to an additional **4 weeks** with written justification

4.3 Final Response Options

Our final decision will include one of the following:

1. A conclusive resolution supported by evidence
2. A reasoned refusal with clear justification
3. A referral to an ADR body for unresolved matters

4.4 Use of Artificial Intelligence (AI)

- AI may assist in standard complaints but is **prohibited** in:
 - Responsible Gaming matters
 - Complex or sensitive complaints
- All AI-generated responses are subject to **human review** to ensure fairness and consistency.

5. Alternative Dispute Resolution (ADR)

- Players may escalate unresolved complaints to an **independent, CGA-approved ADR provider**, at **no cost to the player**.
- **Ex Lux N.V.** bears all ADR expenses.

- Once ADR is completed, the same complaint cannot be re-submitted to another ADR body.
- Withdrawal from ADR voids the right to raise the issue again.

Information on ADR is provided in the Terms and Conditions and on our complaints page.

6. Record-Keeping and Reporting

- Bi-annual reports are submitted to the CGA on:
 - **15 January**
 - **15 June**
- Each report includes:
 - Total number of complaints
 - Resolutions and pending cases
 - ADR referrals
 - Legal proceedings (if any)
- Records of complaints and disputes are retained for a minimum of **five (5) years**, in line with data protection laws.

7. Policy Accessibility

This policy is:

- Linked from our **homepage, registration page, and footer**
- Summarized in our Terms and Conditions
- Accompanied by links to:
 - Contact support
 - Submit a complaint
 - Timelines and ADR information
 - CGA contact details

8. Acceptable Grounds for Complaint

Players may lodge complaints concerning, but not limited to:

1. Deposits and withdrawals
2. Bonuses and promotions
3. Account access or closures

4. Game fairness or technical errors
5. Responsible gaming and self-exclusion
6. Disputes over balances or transactions
7. KYC and identity verification
8. Data protection and privacy
9. Anti-money laundering (AML) obligations
10. Minor access or age verification failures
11. Fraud or suspected cheating
12. Allegedly unfair contract terms

9. Contact Us

To initiate a complaint or request assistance, please contact our Compliance Team:

Email: compliance@takbet.com

Our trained support and compliance staff are available to guide you through the complaints process. For formal submissions, we encourage players to complete the **Complaint Submission Form** available on our website.