

**PLAYER COMPLAINTS POLICY ISLAND
LUKKLY B.V.**

Effective Date: 11.07.2025

Approved by: Executive Management

1. INTRODUCTION

1.1 ISLAND LUKKLY B.V. is committed to protecting player rights by providing a transparent, fair, and timely complaints handling procedure in full alignment with the Curaçao Gaming Authority (CGA) Player Complaints Policy Guidelines v1.1 (2025) and Article 5.3 of the National Ordinance on Games of Chance (LOK).

1.2 The company guarantees access to an effective internal complaints resolution mechanism and free Alternative Dispute Resolution (ADR) services.

1.3 This policy is publicly available and included in the company's Terms and Conditions.

2. PURPOSE

2.1 To ensure that players have a reliable and accessible process to raise complaints and resolve disputes in a structured and timely manner.

2.2 To comply with regulatory obligations established by the CGA and maintain high standards of player protection.

3. SCOPE

3.1 This policy applies to all players of ISLAND LUKKLY B.V. who wish to file a complaint related to the operator's services, including game outcomes, account actions, responsible gaming, and bonus terms.

3.2 The policy applies across all websites, platforms, and brands operated by ISLAND LUKKLY B.V. under a CGA license.

4. DEFINITIONS

4.1 A complaint is defined as a formal written expression of dissatisfaction by a player relating to the services, decisions, terms, or conduct of the operator.

4.2 A dispute is defined as a complaint that remains unresolved to the player's satisfaction and has been escalated to an independent ADR body.

4.3 A Player Interaction is any written communication initiated by a player and directed to the operator's customer service team. This includes general inquiries, feedback, or requests for information or clarification. A complaint, as defined in 4.1, goes beyond interaction by expressing dissatisfaction and expecting resolution.

5. COMPLAINT SUBMISSION

5.1 A complaint shall be submitted within 6 months from the date of playing the game or within 6 months after the end of the event on which the bet was made.

5.2 A complaint shall be submitted either online via the website using the form available via the link or to our support email support@lukkly.com in DOCX or PDF format. A Complaint Submission Form is available on our website in English and the language of the website.

5.3 The complaint must include the following information:

- Player's full name, address, and country of residence;
- Player account ID;
- Date of complaint and date of incident;

- Category of complaint (e.g., deposit, withdrawal, bonus, KYC, responsible gaming, data protection, technical issues, suspected fraud, unfair terms, or regulatory concerns, etc.);
- Detailed description of the issue;
- Any supporting documentation (screenshots, emails, statements, etc.).

5.4 Only the registered player may submit a complaint.

6. COMPLAINT HANDLING PROCESS

6.1 The company will acknowledge receipt of the complaint within 1 week (within 2 business days for Responsible Gaming complaints). The acknowledgment will include an explanation of how the complaint will be processed and the expected resolution timeline.

6.2 Responsible Gaming complaints are prioritized and resolved within 5 working days, with a possible extension of up to 2 weeks.

6.3 All other complaints will be resolved within 4 weeks. If required, this period may be extended once for an additional 4 weeks with prior written notification.

6.4 A final written response will include:

- Reasoned outcome and explanation;
- Supporting facts and documents;
- Explanation for non-acceptance, if applicable;
- ADR escalation option if not resolved to player's satisfaction;

1. 6.5 If the operator decides not to process the complaint, the final response will clearly state the reasons for non-acceptance in line with Article 5.3(4)(a) LOK.

7. ALTERNATIVE DISPUTE RESOLUTION (ADR)

7.1 If a player is not satisfied with the final decision, the case may be escalated to a CGA-certified independent ADR body, free of charge.

7.2 ADR outcomes are binding for ISLAND LUKKLY B.V. and players retain the right to seek independent legal recourse where applicable

7.3 A complaint may only be referred to one ADR provider per issue.

7.4 Contact details and links to our appointed ADR will be provided in the final communication and available on our website.

7.5. Once the ADR process is concluded, the same issue may not be referred to another ADR provider.

8. CGA DISCLOSURE

8.1 The Curaçao Gaming Authority (CGA) does not resolve individual disputes but may be contacted in case of suspected license violations, whistleblowing or regulatory breaches.

8.2 CGA contact:

Website: <https://www.gamingcontrolcuracao.org>

Email: info@gamingcontrolcuracao.org

9. AUTOMATION AND HUMAN INTERVENTION

9.1 All complaints are reviewed and resolved exclusively by trained human personnel.

9.2 Automated systems may be used only as internal tools to assist agents (e.g., template suggestions or routing).

9.3 Under no circumstances are decisions or player communications handled by AI.

9.4 Responsible Gaming cases and complex issues are strictly human-reviewed.

10. RECORD-KEEPING AND REPORTING

10.1 Complaints and resolution data are securely retained for a minimum of 5 years.

10.2 Biannual reports are submitted to the CGA on:

- 15 January and 15 June

10.3 Reports include:

- Number of total complaints
- Resolved and pending cases
- Categories and outcomes
- ADR referrals and any legal escalations

11. APPLICABILITY

11.1 This policy applies to:

- (a) All registered players of ISLAND LUKKLY B.V.
- (b) All company websites and platforms
- (c) Support, compliance, and legal teams handling complaints

12. REFERENCE DOCUMENTS

CGA Player Complaints Policy Guidelines v1.1 (2025)

LOK, Article 5.3

ISLAND LUKKLY B.V. Terms & Conditions

Responsible Gaming Policy

AML/CFT Policy

13. CONTACT

In case you still have any questions, you can write your question to our support team by email - support@lukkly.com.



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Managing Director