

Player Complaints Policy

This Player Complaints Policy (“Policy”) applies to VictoryWillbeours N.V. (“we”, “us”, “our”, “company”), licensed and regulated under the Curaçao National Ordinance on Games of Chance (“LOK”) by the Curaçao Gaming Authority (“CGA”). It sets out our comprehensive internal and external processes for handling player complaints and disputes, ensuring transparency, fairness, timeliness, and compliance. This Policy is published on our website for all players and third-party stakeholders and is referenced verbatim in our Terms and Conditions.

1. Legislative & Regulatory Framework

- ✓ **LOK Article 5.3** mandates licensed operators to maintain a documented complaints and dispute resolution process offering free, quality, independent Alternative Dispute Resolution (ADR).
- ✓ **CGA Player Complaints Policy Guidelines v1.1 (18 June 2025)** provide the detailed minimum standards and transition deadlines.
- ✓ **Data Protection & GDPR** regulations apply to complaint records containing personal data.

2. Scope & Publication

- ✓ **Scope**
 - Applies to all players from license issuance (LOK) or dynamic seal activation (NOOGH).
 - Covers complaints about any service, transaction, decision, conduct, or technical issue.
- ✓ **Publication**
 - Standalone webpage
 - Footer link and registration-page notice
 - Verbatim inclusion in Terms and Conditions, with a mandatory “accept” tick-box at account creation.

3. Key Definitions

Term	Definition
Player Interaction	Any written message from a player to our customer support (e-mail, chat, portal message).
Complaint	A written expression of dissatisfaction requiring investigation and resolution, submitted via our Complaint Submission Form (“CSF”).
Dispute	A complaint not resolved to the player’s satisfaction internally and escalated to ADR or court.
Complaint Submission Form (CSF)	Standardized form (online or downloadable) used to lodge a formal complaint.
ADR Provider	Third-party entity certified by the CGA to adjudicate unresolved disputes free of charge to the player.
LOK	Curaçao National Ordinance on Games of Chance.
CGA	Curaçao Gaming Authority, our licensing and supervisory body.

4. Complaint Categories

Players can select one or more of these categories when filing a CSF:

- 1) **Financial Transactions:** Deposits, withdrawals, account balances
- 2) **Bonuses & Promotions:** Bonus eligibility, wagering requirements, bonus credits
- 3) **Account Management:** Account restrictions, closures, KYC/verification delays
- 4) **Game Integrity:** Alleged errors, malfunctions, unfair outcomes
- 5) **Responsible Gaming:** Self-exclusion, cooling-off, vulnerable player concerns
- 6) **Technical & Software:** Website/app errors, loading failures, connectivity issues
- 7) **AML & Fraud:** Suspicious activity, fraud investigations, chargebacks
- 8) **Data Protection:** Privacy breaches, access requests, data corrections
- 9) **Regulatory & Licensing:** Compliance, licensing queries, whistleblowing

5. Complaint Submission Process

5.1 Submission Channels

- ✓ **Online CSF**

- ✓ **Downloadable CSF**
- ✓ **Email**
- ✓ **Live Chat**

5.2 Eligibility & Windows

- ✓ **Standard bets:** up to 6 months from bet settlement.
- ✓ **P2P games (poker):** 6 months from event conclusion.
- ✓ **In-running bets:** 6 months, but prompt submission is recommended due to data volatility.

5.3 CSF Minimum Fields

- ✓ Player's full name, address, and account number
- ✓ Date of complaint and disputed event
- ✓ Detailed description, category selection, and chronology of events
- ✓ Attachments (screenshots, transaction IDs)
- ✓ Language options: English plus all supported website languages

5.4 Initial Acknowledgement

Within **2 business days** of CSF receipt, we will:

- 1) Confirm receipt to the player's registered email.
- 2) Verify completeness or request missing information.
- 3) Provide a unique complaint reference number.
- 4) Outline the next steps and estimated timelines.

6. Internal Handling & Escalation

6.1 Three-Stage Resolution Framework

Stage	Team	SLA Acknowledgement	SLA Resolution	Activities
Stage 1: Frontline	Customer Support	1 calendar day	5 business days*	Gather info, apply standard remedies, close simple matters.
Stage 2: Specialist	Complaints Specialist	—	7 business days	In-depth investigation, liaise with Ops/Finance/Tech/legal as needed.

Stage	Team	SLA Acknowledgement	SLA Resolution	Activities
Stage 3: Management	Head of Customer Care	—	10 business days	Final internal determination, legal review, prepare formal response.

* For Responsible Gaming issues, resolution within 5 business days; extension up to 2 weeks with notice.

6.2 Escalation Triggers

- ✓ Complaints not resolved at Stage 1 within SLA.
- ✓ Complex issues involving multiple departments.
- ✓ Player dissatisfaction or request for higher review.

6.3 Communication Cadence

- ✓ **Status Updates:** Every 7 days or upon key developments via email/portal.
- ✓ **Priority Notifications:** Immediate if new material evidence or risk to player.

7. Response & Outcome Documentation

7.1 Final Determination Letter

- ✓ **Upheld:** Explanation, corrective actions taken, compensation or account adjustments.
- ✓ **Partially Upheld:** Outcome on each complaint point, partial remedies.
- ✓ **Rejected:** Clear reasons, reference to policy clauses, invitation to ADR.

7.2 Rejection due to Insufficient Information

- ✓ If requested information not provided within **10 business days**, complaint may be closed.
- ✓ Notice sent outlining missing items and closure date.

8. Use of Artificial Intelligence (AI)

- ✓ **Permissible** for categorization, drafting acknowledgements, and simple cases.
- ✓ **Prohibited** for Responsible Gaming and any complaint deemed complex.
- ✓ **Oversight** by Complaints Specialists to ensure consistency, fairness, and auditability.

9. Alternative Dispute Resolution (ADR)

9.1 ADR Provider Panel

- ✓ We maintain agreements with all CGA-certified ADR entities.

- ✓ ADR is free to the player; operator bears costs.
- ✓ ADR details and contact information on website.

9.2 ADR Escalation Steps

- 1) **Player Request:** After internal “final determination,” player notifies operator of ADR intent.
- 2) **Operator Referral:** We forward file to chosen ADR provider within 5 business days.
- 3) **ADR Process:** Provider conducts independent review and issues a binding decision (target: 60 days).

9.3 Post-ADR

- ✓ ADR outcome is final and binding; no subsequent ADR with another provider.
- ✓ Player withdrawing mid-process may not revive the same dispute later.

10. Record-Keeping & Reporting

10.1 Data Retention

- ✓ **Complaint Records:** 5 years or as required by data protection/statute limitations.
- ✓ **Audit Access:** CGA may request records at any time.

10.2 Semi-Annual Reporting

Report Date	Content Summary
Jan 15	Complaints received, upheld/rejected, pending, by category, ADR and legal actions.
Jun 15	Same as Jan 15

- ✓ Reports submitted via the CGA Portal.
- ✓ ADR providers supply separate reports per CGA ADR Policy.

11. Integration in Terms & Conditions

Our Terms and Conditions feature a dedicated “Complaints” section that:

- 1) Links to this Policy and CSF.
- 2) Summarizes submission channels, timelines, and stages.
- 3) Explains ADR rights and CGA’s non-mediation role.
- 4) Provides regulator and ADR provider contact details.

12. Third-Party Access & Transparency

- ✓ **Public Access:** Anyone may view this Policy on our website without logging in.
- ✓ **Site Map Inclusion:** Listed under “Legal” and “Support” sections.
- ✓ **Meta Tags:** SEO-optimized title and description for third-party search engines.

13. Transition & Review

- ✓ **Effective Date:** Published and live on our website from 1 August 2025.
- ✓ **CGA Portal Upload:** Completed by 31 July 2025.
- ✓ **Policy Review:** Annually or upon CGA guideline updates.