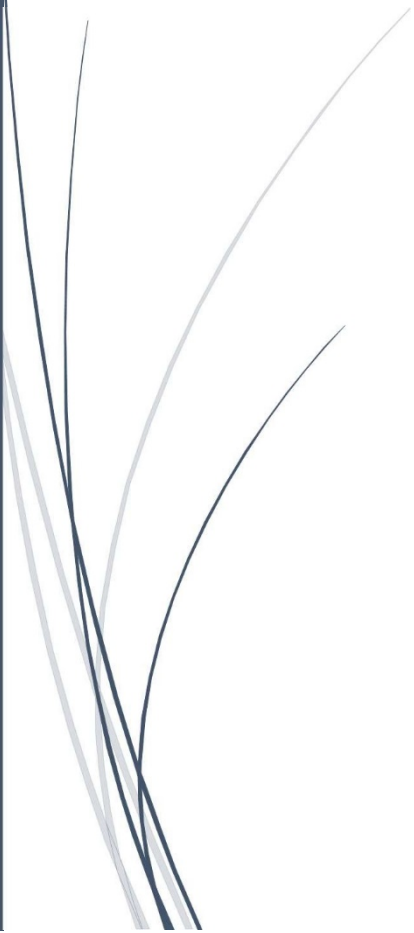




CONFIDENTIAL

Player Complaint Policy for Breckenridge Curacao B.V.

Prepared by	Date	Version
Roberto Viera	5 May 2024	1.0 – Creation

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1.0 Policy Overview

This Player Complaint Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK). Adherence to this policy is mandatory under the LOK, and its implementation is the responsibility of the operator's designated Compliance Officer. The policy aims to guarantee players access to a straightforward and effective dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

2.0 Procedure for Complaints

1. Submitting a Complaint

- Players may lodge a complaint free of charge within six months of the incident related to their participation in a game of chance.
- Complaints must be submitted to the indicated mailbox using a downloadable template, the mailbox and template will be accessible on the operator's website and referenced in the Terms and Conditions.
- The form must include:
 - Complainant's name, address, and place of residence.
 - Complainant's account number (if applicable).
 - Date of the complaint.
 - Description of the conduct being disputed.
 - Language options: English or the language of the target market.
 - Any supporting documentation.

3.0 Complaint Resolution

- **Acknowledgement:** When receiving a complaint, the customer will receive a reply, explaining the process and committing to give a first answer within four weeks.
- **Response and Resolution:** Breckenridge will assess and respond to complaints within four weeks. This period may be extended once by an additional four weeks with prior written notice to the complainant. A final determination will be provided in writing.

4.0 Alternative Dispute Resolution (ADR)

- If a complaint cannot be resolved internally, players are entitled to escalate the matter to an independent ADR provider, free of charge. The operator will bear all costs of the ADR process.
- The contact information for the ADR provider will be included in all complaint communications and in the Terms and Conditions of the operator's website.
- For compliance purposes, Breckenridge has designated the Curaçao Alternative Dispute Resolution Entity (CADRE) as an ADR entity.

5.0 Authority Escalation

- The Curacao Gaming Authority (CGA) will not resolve or make decisions on complaints regarding gambling-related transactions. However, players may contact the CGA if they believe the operator is in breach of regulations.

6.0 Player Support and Reporting

6.1 Contact Points

- Players may submit complaints via email to the mailboxes established on the websites

6.2 Record-Keeping

- Breckenridge will keep a log of all complaints, including those resolved internally, unresolved, escalated to ADR, and escalated to legal proceedings. Records will be maintained for at least five years.

6.3 Regulatory Reporting

- Breckenridge will submit reports to the CGA twice a year (by the 15th of January and the 15th of June every year) summarizing the total number of complaints made, closed, pending, unresolved, referred to ADR, and those involving legal action. It will also summarize the total number of complaints made by category.

7.0 Terms and Conditions

The Complaints procedure statement will be visible and accessible on the websites as a standalone link or document. It will also be clearly outlined in the Terms and Conditions, including:

- Links to customer service and information on how to contact the operator.
- Details of information required for a player to make a complaint.
- Timelines for responses and resolution.
- Player rights to complain, including explicit rights to ADR services and regulatory escalation.
- An explanation of the potential consequences of the ADR entity's decision and the manner in which this will affect the player's right to further legal and judicial recourse.
- Contact information for the ADR provider(s).
- Clear information that the CGA does not mediate in individual disputes but can be contacted if the player feels the operator is in breach of regulations.

8.0 Reasons for Complaint

Players have the right to make a complaint regarding any part of their relationship with the operator or any incident related to their participation in a game of chance. This includes, but is not limited to:

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues
- Treatment of player balances
- KYC and Verification
- Data Protection
- Technical or Software issues
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation

9.0 Communication channels

Players will be able to communicate via email with the operator through the addresses established on the websites

The received emails will be received by the Customer Service treated according to the current Complaint Procedure.