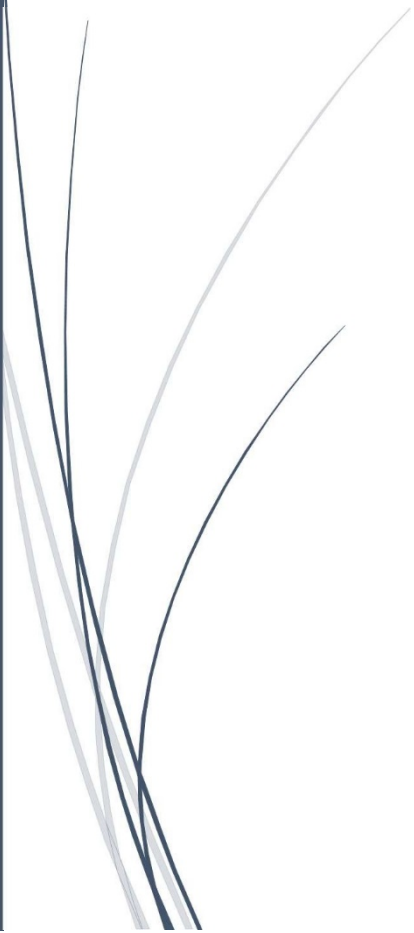




CONFIDENTIAL

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.
- **Complaints Timelines:** 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. The company will provide the player confirmation of receipt, explanation of how it will be processed and average timeline of resolution within the first business week. A final determination will be provided in writing.
- **RG Complaints Timelines:** These complaints will be prioritized and the company will put the best efforts to resolve these cases within five business days, providing confirmation of receipt, explanation of how it will be processed and average timeline of resolution within the first two business days. In case more time is needed to make a reasonable and informed decision, players will be informed of the delay, which will not exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended to two weeks. All complaints pertaining to Responsible Gaming will be handled by humans once identified. A final determination will be provided in writing.
- **Response and Resolution:** The response will be either:

1. A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
2. Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the company will request this information within the initial period. Should the complainant not provide the necessary information within that time period, the company may reject the complaint.
3. If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player is informed that they may escalate the matter to an independent ADR entity.

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 will as an ADR entity an authorized ADR by the CGA (an ADR option is available).

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.