

Player Complaints Policy

Cura Casino B.V.

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1. Purpose and Scope

1.1 Purpose

The purpose of this **Player Complaints Policy** (hereinafter the “Policy”) is to:

- Provide a clear and transparent process through which **Players** of **Cura Casino** can raise **complaints** regarding their experience with the Company’s gaming services.
- Ensure that **all complaints are handled promptly, fairly, and transparently**.
- Protect **Player rights** and promote **trust** in the Company’s services.
- Ensure compliance with:
 - **Curaçao Gaming Control Board (GCB)** licensing requirements,
 - Applicable consumer protection laws,
 - Industry best practices for **Player dispute resolution**.

The Company is committed to providing a **fair and responsible gaming environment** and recognizes that an effective complaints process is an essential component of **Player protection** and **Responsible Gaming**.

1.2 Scope

This Policy applies to:

- **All Players** who use the Cura Casino website and associated services.
- **All complaints** relating to:
 - Account registration and management,
 - Deposits and withdrawals,
 - Game fairness and game outcomes,
 - Responsible Gaming measures,
 - Bonus and promotional offers,
 - Account closures or self-exclusion,
 - Any other aspect of the Player's experience with Cura Casino.

This Policy does not cover:

- **General inquiries** or customer service requests that do not constitute a formal complaint,
- **Matters outside the control of the Company**, such as service interruptions caused by third-party telecommunications providers.

1.3 Relationship with Other Policies

This Policy should be read in conjunction with:

- The Company's **Responsible Gaming Policy**,
- The Company's **Terms and Conditions**,
- The Company's **Privacy Policy**,
- Applicable regulatory requirements imposed by the **GCB**.

2. Definitions

For the purposes of this Policy, the following definitions shall apply:

Complaint

Any **expression of dissatisfaction** received from a Player relating to:

- The operation of the Cura Casino website or services,
- The outcome of a gambling transaction,
- The Player account or balance,
- The handling of Responsible Gaming tools (e.g. Self-Exclusion),
- Bonus terms and promotions,
- The conduct of Cura Casino personnel,
- Any other aspect of the Player's gaming experience.

Player

Any individual who:

- Holds an active or previously active Player account with Cura Casino,
- Has engaged in real-money gambling on the Cura Casino platform,
- Submits a complaint in accordance with this Policy.

Cura Casino

The online casino operated by **Cura Gaming B.V.**, holding a license from the **Curaçao Gaming Control Board (GCB)**.

Complaint Handler

An individual designated by the Company who is:

- Authorized and trained to receive, investigate, and resolve Player complaints in accordance with this Policy,
- Independent of the subject matter of the complaint where possible.

GCB

The **Curaçao Gaming Control Board**, the regulatory authority responsible for licensing and oversight of gaming operators under the Curaçao licensing framework.

Business Days

Any day other than:

- Saturday,
- Sunday,
- Official public holidays in Curaçao.

Resolution

A formal response provided to the Player regarding the outcome of their complaint, including:

- Whether the complaint is upheld or rejected,
- The reasons for the decision,
- Any corrective actions or remedies provided (if applicable).

3. Principles of Complaints Handling

The Company is committed to ensuring that all Player complaints are handled in a manner that reflects the following core principles:

3.1 Fairness

- Complaints are investigated and resolved **objectively and impartially**.
- All Players are treated with **respect and courtesy**, regardless of the nature of their complaint.
- Complaint outcomes are based on:
 - The facts of the case,
 - The applicable Terms and Conditions,
 - Relevant regulatory and legal requirements,

- Industry best practices for Player protection.

3.2 Transparency

- The complaint process is clearly described in this Policy and is readily accessible to all Players.
- Players are informed:
 - How to submit a complaint,
 - What information is required,
 - How their complaint will be handled,
 - The expected timeframes for response,
 - How to escalate the complaint if they are not satisfied with the outcome.

3.3 Timeliness

- Complaints are acknowledged promptly (see Section 5).
- Complaints are investigated and resolved as quickly as possible, with clear **response timeframes** provided to the Player (see Section 6).
- If a complaint requires additional time for investigation, the Player is kept informed of progress and reasons for delay.

3.4 Confidentiality

- All complaints are handled in accordance with the Company's **Privacy Policy** and relevant data protection laws (including GDPR where applicable).
- Personal information provided in connection with a complaint is used solely for:
 - Investigating and resolving the complaint,
 - Fulfilling regulatory or legal reporting obligations,
 - Internal quality improvement.
- Complaint information is shared only with individuals who require it to manage the complaint or related compliance obligations.

3.5 Accessibility

- The complaints process is **accessible to all Players**, including those:
 - Experiencing Responsible Gaming concerns,
 - With disabilities,
 - For whom English is not a first language (reasonable accommodations will be made where possible).

3.6 Player Protection and Responsible Gaming

- Complaints are handled in a manner consistent with the Company's commitment to **Responsible Gaming**.
- If a complaint indicates that a Player may be experiencing gambling-related harm, appropriate **Responsible Gaming interventions** may be initiated in parallel with complaint resolution.

3.7 Right to Escalation

- Players dissatisfied with the outcome of their complaint have the right to **escalate the matter** in accordance with the process outlined in Section 7.
- The Company is committed to participating constructively in any regulatory review or external dispute resolution process as required.

3.8 Continuous Improvement

- Complaints are treated as valuable feedback.
- The Company reviews complaint trends and root causes to:
 - Identify opportunities to improve systems, processes, and Player experience,
 - Strengthen controls and policies,
 - Enhance overall compliance.

4. How Players Can Submit a Complaint

4.1 Submitting a Complaint

Players may submit a complaint to **Cura Casino** using any of the following channels:

- **Email:**
- **Live Chat:**
Accessible via the **Help** or **Support** section of the Cura Casino websites.
- **Web Form:**
A dedicated **Complaints Form** is available on the Cura Casino websites at:

Note: Complaints submitted via telephone or informal communication channels (such as social media) will be acknowledged but Players will be requested to submit the complaint through one of the formal channels listed above to ensure proper documentation and handling.

4.2 Required Information

To ensure that complaints can be investigated and resolved effectively, Players are requested to provide the following information:

- Full name,
- Registered email address associated with the Player account,
- Details of the complaint, including:
 - A clear description of the issue,
 - The date(s) and time(s) of the event(s) concerned,
 - Any relevant transaction or game reference numbers,
- Copies of any relevant correspondence with Cura Casino,
- The outcome or resolution the Player is seeking (if applicable).

4.3 Support for Players

- The Company will provide **reasonable support** to Players who require assistance in submitting a complaint, particularly:
 - Players with **Responsible Gaming concerns**,
 - Players with **disabilities**,
 - Players for whom **English is not a first language**.
- Players are encouraged to contact **Customer Support** if they need help in preparing or submitting their complaint.

4.4 Limitations

- Complaints must be submitted within **six (6) months** of the event giving rise to the complaint, unless exceptional circumstances apply (as determined by the Company).
- Complaints that are deemed to be:
 - **Vexatious**,
 - **Abusive**,
 - **Unsubstantiated** and submitted solely to disrupt operations, may be rejected following internal review and with appropriate explanation provided to the Player.

5. Acknowledgement of Complaints

5.1 Initial Acknowledgement

- Upon receipt of a complaint submitted through one of the formal channels (Section 4), the Company will send an **Acknowledgement of Receipt** to the Player within a maximum of **two (2) Business Days**.
- The acknowledgement will be sent to the Player's registered email address or the email address used to submit the complaint.

5.2 Content of Acknowledgement

The Acknowledgement of Receipt will include:

- Confirmation that the complaint has been received and logged,
- The unique **Complaint Reference Number** assigned to the case,
- The name or position of the **Complaint Handler** assigned,
- A brief description of the next steps in the process,
- The expected timeframes for investigation and resolution (see Section 6),
- Contact details for any follow-up inquiries regarding the complaint.

5.3 Complaint Register

- All complaints received are entered into the Company's **Complaint Register**, maintained by the Compliance Team.
- The Complaint Register includes:
 - Date of receipt,
 - Complaint Reference Number,
 - Player details,
 - Description of the complaint,
 - Status of investigation,
 - Resolution outcome,
 - Date of resolution,
 - Any regulatory reporting made.

5.4 Communication Standards

- Acknowledgements and all further complaint-related communications will be provided in **clear and plain language**, avoiding legal jargon where possible.
- The Company ensures that communications remain:
 - **Professional**,
 - **Courteous**,
 - **Non-confrontational**,
 - **Respectful of Player dignity**, regardless of the nature of the complaint.

6. Investigation and Resolution Process

6.1 General Principles

The Company conducts complaint investigations in accordance with the following principles:

- **Objective and impartial investigation** based on the facts of the case.
- Adherence to applicable **Terms and Conditions**, regulatory requirements, and Player protection standards.

- **Timely handling** to ensure Players are not unduly delayed in receiving a resolution.
- Clear and transparent communication throughout the process.

6.2 Investigation Process

- Each complaint is assigned to a designated **Complaint Handler** who is:
 - Trained in the proper handling of Player complaints,
 - Independent of the subject matter of the complaint wherever possible.
- The Complaint Handler will:
 - Review all relevant records and communications,
 - Consult with internal departments as necessary (e.g. Customer Support, Payments, Security, Responsible Gaming),
 - Request additional information from the Player where required,
 - Ensure that any potential **Responsible Gaming** concerns are also considered and escalated if needed.

6.3 Timeframes for Resolution

- The Company aims to provide a **final response** to all complaints within a maximum of **twenty-one (21) calendar days** from the date of initial receipt.
- If it is not possible to provide a final response within this timeframe (e.g. due to complexity or third-party dependencies), the Player will be:
 - Informed of the reason for the delay, and
 - Provided with an updated expected timeframe for resolution.

6.4 Communication of Outcome

- The final response will be provided to the Player in **writing**, via email or other suitable written medium.
- The response will include:
 - A clear statement of the Company's decision (complaint upheld or rejected),
 - The reasons for the decision, referencing relevant evidence and/or Terms and Conditions,

- Details of any **corrective actions** or remedies to be provided (if applicable),
- Information on the Player's right to escalate the complaint further (see Section 7).
- All final responses are subject to **review by the Compliance Team** prior to issuance to ensure consistency and regulatory alignment.

6.5 Good Faith Requirement

- The Company expects Players to engage with the complaints process in **good faith** by:
 - Providing accurate and complete information,
 - Responding to requests for further information in a timely manner,
 - Communicating respectfully and constructively.
- The Company reserves the right to suspend the handling of complaints that:
 - Are submitted in bad faith,
 - Are abusive or harassing in nature,
 - Lack any material basis.
- In such cases, the Company will communicate the decision to the Player and document the rationale in the Complaint Register.

7. Escalation Process

7.1 Player Right to Escalate

- If a Player is dissatisfied with the outcome of their complaint or the handling of their complaint, they have the right to **escalate the matter**.
- The Company encourages Players to first request an **internal escalation** before pursuing external remedies, to allow the Company to conduct a further review.

7.2 Internal Escalation

- A Player may request that their complaint be reviewed at a higher level within the Company by submitting an **escalation request**

- The escalation request should include:
 - The original **Complaint Reference Number**,
 - The reason for dissatisfaction with the initial outcome,
 - Any new or additional information the Player wishes to provide.
- Upon receipt of an escalation request:
 - The complaint will be reviewed by a **senior member of the Compliance Team** or another member of management not previously involved in the case.
 - The Player will receive a final escalated response within a maximum of **fourteen (14) calendar days** from receipt of the escalation request.

7.3 External Dispute Resolution

- If the Player remains dissatisfied after the internal escalation process, they may escalate the matter to the **Curaçao Gaming Control Board (GCB)**.
- The final internal response will include:
 - Information on how the Player may contact the GCB to submit an external complaint or dispute.
- Contact details for the **Curaçao Gaming Control Board**:
 Website: www.gamingcontrolcuracao.org
 Email: complaints@gamingcontrolcuracao.org

7.4 Cooperation with External Review

- The Company is committed to:
 - Fully cooperating with any **external dispute resolution** process initiated through the GCB,
 - Providing requested records and evidence,
 - Implementing any binding outcomes or remedies resulting from the GCB's review.
- Players retain all legal rights to pursue other forms of **legal recourse** where applicable under relevant law.

8. Record Keeping and Reporting

8.1 Complaint Register

- The Company maintains a centralized **Complaint Register**, managed by the Compliance Team.
- The Complaint Register includes the following details for each complaint:
 - Unique **Complaint Reference Number**,
 - Player identification (account details),
 - Date of receipt,
 - Nature and subject of the complaint,
 - Departments involved in investigation,
 - Investigation findings,
 - Final resolution outcome,
 - Date of final resolution,
 - Any escalations (internal or external),
 - Any regulatory reporting made.

8.2 Retention of Records

- Complaint records are retained for a minimum of **five (5) years** from the date of resolution, in accordance with:
 - **GCB licensing requirements**,
 - Applicable data protection laws (including **GDPR** where applicable),
 - Best practices for regulatory audit readiness.
- Records are stored securely and access is restricted to authorized personnel only.

8.3 Regulatory Reporting

- The Company is committed to fulfilling all applicable **regulatory reporting obligations** in relation to Player complaints, including:
 - Providing reports to the **GCB** as required under licensing conditions,
 - Cooperating with GCB requests for individual complaint files or aggregated complaint statistics,
 - Notifying the GCB of any **systemic issues** identified through complaint trends.
- The Compliance Team is responsible for coordinating all regulatory complaint reporting.

8.4 Board Reporting and Oversight

- The Complaint Register is reviewed **quarterly** by the Compliance Team to:
 - Identify trends or recurring issues,
 - Assess the effectiveness of the complaints process,
 - Identify opportunities for improvement.
- A summary report on complaint handling, including:
 - Volumes,
 - Resolution times,
 - Root causes,
 - Any escalated cases,
is presented to the **Risk Committee** and the **Board of Directors** on a **quarterly basis**.
- Material issues or high-profile complaints are escalated to the Board immediately.

9. Continuous Improvement

9.1 Learning from Complaints

The Company views **Player complaints** as a critical source of:

- **Operational feedback,**
- **Risk intelligence,**

- Opportunities for **service and process improvement**.

The Company is committed to:

- Systematically analyzing complaint trends,
- Identifying underlying causes,
- Implementing corrective and preventive actions.

9.2 Root Cause Analysis

- The Compliance Team conducts regular **root cause analysis** of complaints, with a focus on:
 - Repeated or systemic issues,
 - Gaps in procedures or controls,
 - Opportunities to improve the **Player experience**,
 - Responsible Gaming and Player protection dimensions.
- Outcomes of root cause analysis are documented and reviewed as part of the quarterly **Board reporting** process (Section 8).

9.3 Policy and Process Updates

- Insights gained from complaint handling and analysis are used to:
 - Update this **Player Complaints Policy**,
 - Enhance the **Responsible Gaming Policy**,
 - Refine internal procedures and controls,
 - Improve terms of Player communication,
 - Drive enhancements to game fairness and transparency.
- The CISO, Compliance Team, and Responsible Gaming function collaborate to ensure that relevant improvements are implemented.

9.4 Staff Training and Awareness

- Lessons learned from complaints are integrated into:
 - **Staff training programs**,

- Targeted awareness sessions for front-line Customer Support staff,
 - Training for Complaint Handlers.
- Special focus is given to:
 - Improving staff understanding of Player concerns,
 - Reinforcing **fair treatment of Players**,
 - Strengthening Responsible Gaming alignment.

9.5 Commitment to Ongoing Improvement

- The Company views **continuous improvement** as a core commitment to:
 - Player trust,
 - Regulatory compliance,
 - Market reputation.
- The Player Complaints Policy and associated processes are subject to **annual review** and ad hoc updates based on:
 - Complaint trends,
 - Regulatory changes,
 - Industry best practices,
 - Feedback from Players, regulators, and Partners.