

Player Complaints Handling Procedure Cura Casino B.V

Version 1.0

Date: 1st August 2025

1. Purpose

This Complaints Policy ensures that all player complaints and disputes are handled fairly, transparently, and in accordance with **Article 5.3 of the National Ordinance on Games of Chance (LOK)**.

2. Objectives

This policy is an integral part of our Terms & Conditions and outlines the procedures for filing, handling, and resolving complaints. All players are entitled to a free and fair process, including access to **Alternative Dispute Resolution (ADR)** services when applicable.

3. Responsibilities

3.1. Customer Support Team

The Customer Support Team is responsible for managing all player communications and ensuring they are answered as quickly as possible while maintaining high quality standards.

4. Procedure

4.1. Submitting a Complaint

A complaint is defined as a written expression of dissatisfaction related to our services, terms, or decisions, submitted by a registered player who expects a resolution.

- Players may submit a complaint up to **6 months** from the date of the incident or bet settlement.

- **How to submit:**
 - Email:
 - Live Chat: Available 24/7

- **Details to include:**
 - Full name, address, and place of residence.
 - Account Number.
 - Date of the complaint and the incident.
 - A detailed description of the issue.
 - Supporting documents, if applicable.

4.2. Complaint Handling Process

4.2.1. Responsible Gaming Complaints

- These complaints are prioritized due to potential harm.
- We will confirm receipt within **2 business days** and provide an explanation of the processing steps and the estimated timeline for resolution.
- Complaints are resolved within **5 business days** when possible.
- The maximum delay is an additional **2 weeks**, with justification.

4.2.2. Other Complaints

- We will confirm receipt within **1 week** and provide an explanation of the processing steps and the estimated timeline for resolution.
- Complaints are resolved within **4 weeks** when possible.
- If a complaint is complex, a one-time extension of an additional **4 weeks** may be granted with prior written notice to the player.

4.2.3. Final Response

Our final response will include:

- A reasoned assessment of the outcome/resolution, with supporting evidence if necessary.
- Detailed reasons for not handling the complaint (e.g., if the player failed to provide requested information within the initial four-week period).
- Information that the player may escalate the matter to **ADR** if they remain unsatisfied with the resolution.

5. Alternative Dispute Resolution (ADR)

5.1. Availability of ADR

- The Customer Support team will inform all players of their right to escalate unresolved complaints to **ADR**. The escalation procedure will be available on our website and through customer service communications.

5.2. ADR Engagement

- The Company will engage **ADR**, an entity that provides independent and binding ADR services in Curacao.
- All licensed operators under LOK are legally required to provide ADR in accordance with the **Curacao Gaming Authority's (CGA)** guidelines.

5.3. Escalating to ADR

Players may initiate ADR if:

- They have submitted a valid complaint via our official complaint form.
- We have issued a final response or failed to resolve the complaint within the stated

timelines.

- They remain dissatisfied with the final outcome.

To initiate ADR, the player must:

- Contact the designated ADR entity.
- Submit all evidence and communication history related to the complaint.
- Complete the ADR provider's application or complaint form.

5.4. Operator Obligations

- We have a formal agreement with at least one CGA-certified ADR provider, which is uploaded to the CGA portal.
- We bear all costs of the ADR process.
- Once an ADR case begins, neither party may initiate the same case with another ADR entity.
- If a player abandons the ADR process, the issue is considered closed and cannot be refiled.
- We must comply with all ADR decisions and maintain transparent records of all cases referred to ADR.

5.5. Possible ADR Outcomes

- **Complaint Upheld:** The player receives compensation or corrective action (e.g., restored account, refunded bet).
- **Complaint Rejected:** The ADR finds no breach or wrongdoing by the operator.
- **Partial Resolution:** The ADR proposes a compromise settlement.

6. Record Keeping & Reporting

- The Company will maintain a dated record of all interactions and complaints, along with the reasons for their resolution or rejection. This record will be kept for at least **five years** from the last interaction with the customer.
- We report complaints data to the Curacao Gaming Authority **twice yearly** (by January 15 and June 15). The report will summarize:
 - Total number of complaints.
 - Total number of settled complaints (upheld and rejected).
 - Number of pending or unresolved complaints.
 - Number of complaints by category.
 - Number referred to ADR.
 - Number and details of complaints for which a player has taken legal action.

