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PLAYER COMPLAINTS

Standard Operating Procedure (SOP): Handling Player Complaints

Document Version: 1.0

Policy Reference: Player Complaints Policy (June 2025)

Regulatory Basis: Article 5.3, National Ordinance on Games of Chance (LOK)

1. Purpose

To provide a clear, consistent process for managing, resolving, and reporting player complaints in compliance with regulatory standards.

2. Scope

Applies to all licensed operators and their employees responsible for handling player interactions, complaints, disputes, and regulatory reporting.

3. Definitions

- **Player Interaction:** Any written query or message from a player.
- **Complaint:** A written dissatisfaction requiring a response.
- **Dispute:** A complaint not resolved internally and escalated to ADR or legal action.

4. Responsibilities

- **Customer Support:** First point of contact for all player complaints.
- **Compliance Team:** Ensures policy compliance, manages escalation, reporting.
- **ADR Provider:** Handles unresolved complaints independently.

5. Complaint Handling Procedure

5.1 Complaint Submission

- Accept only from the registered player.
- Provide Complaint Submission Form (online).
- Required fields: name, contact, account number, date, complaint details.
- Accept complaints up to 6 months after incident/bet settlement or where practical to do so.

5.2 Acknowledgement

- Send confirmation:
 - **Within 2 business days** for Responsible Gaming issues.
 - **Within 5 business days** for all others.
- Include process overview and estimated resolution timeline.

5.3 Investigation & Resolution

- **Responsible Gaming Complaints:**
 - Immediate suspension of ALL functions on account.
For avoidance of any doubt, deposit and gameplay must be disabled immediately to avoid further harm to player.
 - Target resolution: **5 business days**.
 - Max delay: **2 weeks** (if justified).
- **Other Complaints:**
 - Target resolution: **4 weeks**.
 - Extension: **+4 weeks** (with written notice if justified).
- Final response must be written and include:
 - Decision and rationale.
 - Evidence (if applicable).
 - Further steps or ADR referral (if unresolved).

6. Escalation to ADR

- Once dispute is resolved and provided to player, Support agent will inform players of ADR options in writing.
- Once ADR begins, dispute cannot be re-opened by operator Support.

7. Use of Artificial Intelligence (AI)

- **Not permitted for:**
 - Responsible Gaming complaints
 - Complex complaints
- Permitted for simple complaints with monitoring for consistency.

8. Role of the CGA

- CGA **does not resolve individual complaints.**
- Players may contact CGA for issues like:
 - Breach of license
 - Malpractice or regulatory violations
- CGA may request access to complaint records at any time.

9. Record-Keeping & Reporting

- Reports due **January 15th and June 15th** each year.
- Report will include:
 - Total complaints
 - Outcomes (resolved, rejected, ADR, legal)
 - Complaint categories
- Retain records for **5 years** or per law.

10. Terms & Conditions Integration

- Publish complaint procedure visibly on site.
- Include:
 - Complaint process and form links
 - Contact info
 - ADR details
 - CGA disclaimer

11. Valid Complaint Categories

1. Deposit/Withdrawal issues
2. Bonus terms
3. Account closures/restrictions
4. Game fairness
5. Responsible Gaming matters

6. KYC/Verification
7. Fraud
8. Technical issues
9. AML violations
10. Underage gambling
11. Licensing and regulatory concerns