

OPTIM DEVELOPMENT B.V.

Player Complaints Policy

Effective Date:

20.09.2025

Next Review Date:

10.01.2026



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1. Purpose

This policy defines how player complaints are received, reviewed, and resolved in a fair and transparent manner in line with Article 5.3 of the National Ordinance on Games of Chance (LOK).

2. Scope

Applies to all complaints regarding account management, payments, bonuses, technical issues, game fairness, responsible gaming, AML, or data protection.

3. Definitions

Complaint – A written expression of dissatisfaction about our services where the player expects a response or fix.

Dispute – A complaint that was not resolved to the player's satisfaction after our internal process and is raised to an independent body or court.

National Ordinance on Games of Chance ("LOK") – Curaçao gambling law that sets core requirements for operators.

Curaçao Gaming Authority ("CGA") – The regulator that supervises operators under the law.

Alternative Dispute Resolution ("ADR") – An independent organisation that reviews unresolved complaints and issues a decision at no cost to the player.

Responsible Gaming Complaint – A complaint about self-exclusion, cooling-off, protection of vulnerable players, or similar safety matters.

4. Who Can Complain and Time Window

Only the registered account holder can submit a complaint.

A complaint must be submitted within six (6) months of the settlement of the relevant bet or of the incident. For in-running sports betting, prompt action may be needed if data is transient.

5. How to Submit a Complaint

Players can submit complaints free of charge using any of the following channels:

- Support email listed on the website.
- Live chat on the website or in the app.
- The Complaint Submission Form (downloadable or online).

The form asks for: name, country/city, account ID, dates, a short description, and any relevant screenshots or documents. We accept forms in English and in the language of the website the player uses.

6. Acknowledgment Timelines

- Responsible Gaming complaints: written acknowledgment within two (2) business days.
- All other complaints: written acknowledgment within seven (7) days.

7. Investigation and Resolution Timelines

- Responsible Gaming complaints: we aim to resolve within five (5) business days. If more time is needed to make a fair decision, we inform the player and may extend up to two (2) weeks. If more time is needed due to missing player information, we may extend once more by up to two (2) weeks.
- All other complaints: we aim to resolve within four (4) weeks. If the case is complex or information is missing, we may extend once by an additional four (4) weeks and notify the player in writing.

8. What Our Final Response Contains

Our written response will include:

- Our decision and the reasons for it, with evidence where relevant; or
- Reasons why the complaint cannot be handled and what information is still required; and
- Information about the right to escalate the case to Alternative Dispute Resolution and how to do so.

9. Escalation Stages

Stage 1 – Internal Review: Our support team investigates and provides a written outcome within the timelines above.

Stage 2 – Senior Review: If the player is not satisfied, the case may be reviewed by a senior compliance manager.

Stage 3 – ADR: If still unresolved, the player can refer the case to a Curaçao Gaming Authority-certified Alternative Dispute Resolution provider. ADR is free for the player.

10. Alternative Dispute Resolution (ADR)

We maintain a signed agreement with at least one CGA-certified ADR provider. Once an ADR process is completed, it cannot be restarted with a different ADR provider. If the player stops participating after ADR has started, the player should not re-open the same dispute later.

11. The Role of the Curaçao Gaming Authority (CGA)

The CGA does not resolve individual transactional disputes between players and operators. However, players may contact the CGA about suspected regulatory breaches or malpractice. The CGA may use such information for supervision and enforcement.

12. Records and Reporting

We keep complaint records, including communications and outcomes, for at least five (5) years or longer if required by data protection law or statute of limitations. Twice per year (15 January and 15 June), we submit summary complaint reports to the regulator, as required.

13. Policy Review

This policy is reviewed at least annually or sooner if regulations change.