

# **PLAYER COMPLAINTS POLICY**

**Version: 1.0**

**Date of effectiveness (last update): 30.07.2025**

## Introduction

This Policy has been prepared in line with the Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK) and the player-complaint and dispute-resolution guidelines issued by the Curaçao Gaming Authority.

Sprut Group B.V., registration No. 149459, with its registered office at Abraham Mendez Chumaceiro Boulevard 03, Willemstad, Curaçao, is committed to offering a transparent, fair and easily accessible complaints procedure for all users of the gaming platform available at its Domain

As a licensed operator in Curaçao, we understand the importance of resolving player disputes promptly and constructively. Under this Policy, players may submit a complaint and, where required, refer the matter to an independent Alternative Dispute Resolution (ADR) provider.

Unless defined otherwise in this Policy, capitalized terms have the meanings given to them in the Applicable legislation.

## Definitions

**“Player Interaction”** shall mean any written communication initiated by a player and directed to the operator’s customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

**“Complaint”** shall mean a written expression of dissatisfaction submitted by a registered player concerning the operator’s services, decisions, terms, or conduct. A complaint indicates that the player is unhappy and expects a response or resolution.

**“Company, we”** shall mean Sprut Group B.V., registration No. 149459, with its registered office at Abraham Mendez Chumaceiro Boulevard 03, Willemstad, Curaçao.

**“Policy”** shall mean the Player Complaints Policy developed by the Company

**“Applicable legislation”** shall mean National Ordinance on Games of Chance and the Curacao Gaming Authority guidelines

**“Domain”** shall mean spinbetter.com

**“Player”** shall mean any individual who has successfully registered an account on the domain

**“Alternative Dispute Resolution (ADR) provider”** shall mean a neutral third party who facilitates alternative dispute resolution (ADR) processes like mediation, arbitration, or early neutral evaluation, approved by the Curaçao Gaming Authority (CGA).

## Complaint

Players may submit complaints regarding, but not limited to, technical issues, terms and conditions, actions of the operator’s staff, or other matters as outlined in Section 8 of this Policy. Complaints must be submitted in writing and include all relevant details to enable effective review and resolution.

**Only the registered account holder may submit a complaint. The right to file a complaint is non-transferable and may not be assigned to or exercised by third parties.**

## **Dispute**

A dispute arises when a complaint has not been resolved to the player's satisfaction through the operator's internal complaints process and is subsequently escalated, either within the organization or to an independent third party, such as an Alternative Dispute Resolution (ADR) provider or a court of law.

Players have the right to pursue further resolution through ADR services, which are offered free of charge, or to initiate legal proceedings in accordance with applicable laws. The operator fully supports the player's right to seek fair and independent redress.

### **Alternative Dispute Resolution (ADR)**

If a dispute cannot be resolved through the Company's internal complaint-handling process, Players have the right to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider. ADR is a neutral and impartial process aimed at achieving a fair resolution without the need for legal proceedings. This service is provided free of charge to the player, and all related costs are borne by the operator. Once the ADR process is concluded, it may not be restarted with another ADR entity.

### **Deadline for filing a complaint**

Players may submit a formal complaint within six (6) months from the date of the incident or issue in question:

For bet-related issues, the 6-month period begins from the moment the bet is settled.

For poker or other peer-to-peer (P2P) games, the timeframe starts from the conclusion of the relevant game session.

For live or in-running betting, we strongly encourage players to submit complaints as promptly as possible, since some data essential for investigation may no longer be available after a limited time period. The operator cannot reasonably be expected to retain such data indefinitely.

### **Filing a complaint**

Only the registered player may file a complaint. Complaints must be submitted in writing via email [claims@spinbetter.com](mailto:claims@spinbetter.com) using the same email address associated with the player's account.

Suppose a complaint or inquiry is initially submitted through live chat, and it requires further clarification or escalation. In that case, the support team will inform the player about the appropriate method for submitting a formal complaint – including guidance on how to complete and send the official Complaint Submission Form.

This **Complaint Submission Form** is available for download on the Domain and must be completed and returned either via email or through any other submission channel as directed by the support team. A sample version of the form is provided as Annex 1 to this Policy.

1. The Complaint Submission Form must include the following information:
2. Player's full name, residential address, and country
3. Account number (if applicable)
4. Date of the disputed incident and the date of complaint submission
5. Clear and specific description of the issue (including relevant categories, if applicable)
6. Any supporting evidence, such as documents or screenshots, if required

The date on which the complaint is received by the support team will be considered the official date of complaint submission.

We accept complaints in English as well as in the language of the website the player is using at the time of interaction.

### **Time limits for consideration of complaints**

We are committed to handling all complaints in a timely and transparent manner. The timeframes for processing complaints vary depending on the nature of the issue.

### **Responsible Gaming Complaints**

For complaints related to Responsible Gaming, such as self-exclusion, cooling-off periods, or the handling of vulnerable players, the following deadlines apply:

A written confirmation of receipt will be sent within **two (2) business days** from the date the complaint is received.

A full and reasoned response will be provided within **five (5) business days** of receipt.

If additional time is required to reach a fair and informed decision, the timeline may be extended by no more than **two (2) additional weeks**, and the player will be notified of the reason for the delay.

If the delay is due to a lack of response from the player, the resolution period may be extended by up to an **additional two (2) weeks**.

### **Other types of complaints**

For all other types of complaints:

We will acknowledge receipt of the complaint in writing within seven (7) calendar days.

A final response will be issued within four (4) weeks of receiving the complaint.

If the issue is complex or requires further investigation, the deadline may be extended once by up to an additional four (4) weeks, with prior written notice and an explanation provided to the player.

In all cases, the player will receive a written response that includes either:

A reasoned final decision supported by relevant evidence; or

An explanation of why the complaint cannot be processed.

If additional information is required, we will request it within the initial four-week period. If the player fails to respond within a reasonable time, the complaint may be closed as ineligible for further investigation.

Suppose you are not satisfied with the outcome of your complaint through our internal procedure. In that case, you have the right to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider. The ADR process is designed to provide a neutral, fair, and impartial review of unresolved disputes.

By the Applicable legislation, we are required to ensure players have the opportunity to submit a complaint to an ADR provider free of charge. This provider must be selected from a list of certified entities approved by the Curaçao Gaming Authority (CGA).

Please note: As of the time of this Policy's publication, the CGA has not yet released its official list of approved ADR providers.

Until such a list is published, players may, at their discretion and expense, refer complaints to reputable and certified ADR providers that meet the standards of transparency, independence, and professional integrity.

Once the list of CGA-certified ADR entities is made public, this Policy will be updated to reflect the applicable procedures and contact information.

Additional terms:

- Once an ADR process is completed, the same complaint cannot be submitted again to a different ADR provider.
- If the player voluntarily withdraws from an ongoing ADR procedure, the complaint will be deemed closed and not subject to further ADR review.

### **Possible Reasons for a Complaint**

Players have the right to file a complaint regarding any aspect of their relationship with the operator. Common grounds for submitting a complaint may include (but are not limited to):

- Delays or issues with deposits or withdrawals
- Unclear or unfair bonus terms and conditions

- Unjustified account restrictions or closures
- Game errors or malfunctions
- Issues with identity verification (KYC)
- Incorrect handling of personal data
- Failure to implement or respect responsible gaming measures
- Technical issues on the platform
- Suspected fraud or irregularities
- Alleged violations of licensing conditions or platform rules

This list serves as a reference to help players identify the potential basis for a complaint and to facilitate faster and more accurate processing. However, it does not limit the player's right to raise concerns on other grounds.

### **CGA's role and complaint handling**

The Curaçao Gaming Authority (CGA) does not mediate or make decisions on individual player complaints related to gambling transactions, such as bet settlements, bonuses, or account management. These matters must be addressed through our internal complaints procedure as outlined in this Policy.

However, if you believe that we have breached regulatory obligations or violated the conditions of our license, you have the right to report the issue directly to the CGA. Such reports can be submitted using the online complaint form available on the CGA's official website:

<https://www.gamingcontrolcuracao.org/>

Please note:

The CGA will not intervene in individual disputes between players and operators. Any information Players provide may be used by the CGA in the context of its supervision, monitoring, or enforcement actions.

As a licensed operator, the Company is required to:

1. Retain records of all complaints for a period of at least five (5) years, or as otherwise required under applicable data protection or statutory limitation laws.
2. Submit semi-annual reports to the CGA summarizing all complaints received during the reporting periods. These reports are submitted on January 15 and June 15 of each year.

## **Use of Artificial Intelligence (AI)**

The Company may employ artificial intelligence (AI) technologies to assist in the complaint-handling process, particularly for standardized or routine queries. However, we strictly adhere to the limitations and standards outlined in regulatory guidance.

If a complaint is identified as relating to Responsible Gaming, including matters such as self-exclusion, deposit limits, or interactions involving vulnerable players, all communication with the player will be handled exclusively by a human representative. AI may not be used in these cases.

Complaints that are complex in nature or circumstances, and which require discretionary analysis or individual judgment, must also be addressed by a human, not AI.

We continuously monitor the use of AI tools to ensure consistency, fairness, and compliance in all complaint-related interactions.

**Annex 1**  
**COMPLAINT SUBMISSION FORM SECTION**

**SECTION 1: PLAYER DETAILS**

| Field                                 | Information to Provide |
|---------------------------------------|------------------------|
| Full Name                             | <div></div>            |
| Residential Address                   | <div></div>            |
| Country of Residence                  | <div></div>            |
| Email Address (used for registration) | <div></div>            |
| Account Number (if applicable)        | <div></div>            |

**SECTION 2: COMPLAINT DETAILS**

| Field                              | Information to Provide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Date of Incident (DD/MM/YYYY)      | <div></div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Date of Complaint Submission       | <div></div>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Subject /<br>Category of Complaint | <div><div><input type="checkbox"/> Deposit issue</div><div><input type="checkbox"/> Withdrawal issue</div><div><input type="checkbox"/> Bonus terms and conditions</div><div><input type="checkbox"/> Account closure or restriction</div><div><input type="checkbox"/> Game error or unfair result</div><div><input type="checkbox"/> Responsible gaming / self-exclusion</div><div><input type="checkbox"/> Verification / KYC</div><div><input type="checkbox"/> Data protection</div><div><input type="checkbox"/> Technical issue</div><div><input type="checkbox"/> Suspected fraud</div><div><input type="checkbox"/> Regulatory or license breach</div><div><input type="checkbox"/> Other (specify): <div></div></div></div> |

### SECTION 3: SUPPORTING EVIDENCE

**Field**

**Information to Provide**

**Supporting Documents Provided:** ☐ Yes  
☐ No

**List or Describe Files Attached:** \_\_\_\_\_  
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### SECTION 4: LANGUAGE PREFERENCE

**Field**

**Information to Provide**

**Preferred Language for Response** ☐ English  
☐ Language of website used: \_\_\_\_\_

### SECTION 5 DECLARATION

I confirm that I am the registered account holder and that the information provided above is accurate and complete to the best of my knowledge.

Signature: \_\_\_\_\_

Date: