

Dispute Resolution Policy

Last updated: 17.03.2026

This Dispute Resolution Policy applies to all Players of the SpinBetter platform operated by Sprut Group B.V., licensed in Curaçao. It outlines the mandatory complaint and escalation procedures in accordance with the *Landsverordening op de kansspelen (A° 2024 N° 157)*.

1. General Principles

If the Player disagrees with any decision of the Company in connection with a bet, payout, odds, promotion, or any other aspect of the gaming contract, or if the Player considers the betting contract to be invalid or not concluded, the Player shall first follow the internal complaints procedure set forth below.

Players are strictly required to complete the internal complaint process before contacting any external dispute resolution body, this does not restrict your right to directly contact the Curaçao Gaming Authority (CGA) regarding licensing breaches or malpractice.

By accepting these Terms, the Player expressly agrees that the completion of the independent Alternative Dispute Resolution (ADR) process is a mandatory precondition to initiating any formal legal or judicial proceedings against the Company, to the maximum extent permitted by applicable civil law.

Complaints may only be submitted by the registered Player. In accordance with applicable regulations, Players are strictly prohibited from selling, donating, renting, leasing, pawning, or pledging any claims against the Company to any third party under any title.

2. Submitting a Complaint

Players have the right to submit a Complaint regarding any aspect of their relationship with the Company or any incident related to game participation. This includes, but is not limited to: deposits and withdrawals, bonus terms, account closures or restrictions, game outcomes, responsible gaming issues, treatment of balances, KYC/AML procedures, data protection, technical/software errors, unfair terms, and issues concerning minors or fraudulent practices.

In the first instance, support is available via Live Chat and complaints@spinbetter.com. To formally escalate a dispute, Players must submit the official Complaint Submission Form, which is available in English and the language of the website. The form requires: the Player's full name, address, place of residence, account number, date of the complaint, date of the disputed event, complaint category, and supporting documentation.

Players may submit a complaint within 6 months of the incident or bet settlement. For in-running sports betting, prompt submission is strongly advised, as underlying event data may quickly become unavailable. For peer-to-peer (P2P) games or ante-post fixed odds betting, this 6-month period commences upon bet settlement or the conclusion of the specific event, rather than at the time the wager was placed.

If the complaint lacks sufficient supporting information or is filed outside the deadlines, it may be dismissed without consideration.

3. Internal Complaint Review

- Within 1 week, the Company will confirm receipt, explain the review process, and provide the average timeline for resolution. A final reasoned response shall be issued within 4 weeks. This period may be extended by an additional 4 weeks in cases of complexity or missing information, provided prior written notice is given to the Player.
- If the Company requires additional information to fully address the complaint, it must request such details within the initial 4-week period. Failure by the Player to provide the requested information within that timeframe may result in the complaint being rejected.
- If the Player is required to provide additional documentation, the response period may be extended by no more than a further two weeks.

In the case of conflicting outcomes from different sources, the Company shall rely on the official result published by the relevant game provider, sports federation, or governing body. If no precedent applies, the Company will resolve the matter at its own discretion in accordance with applicable rules and fairness principles.

Complaints related to Responsible Gaming are prioritized and acknowledged within 2 days (including process details and average timeline). We aim to resolve these within 5 business days; any necessary delay will not exceed 2 weeks (or up to 4 weeks if the delay is caused by the Player). Both Responsible Gaming and complex complaints are handled exclusively by human agents. Where Artificial Intelligence is utilized for other inquiries, its resolutions are continuously monitored for fairness and consistency.

If the Player remains unsatisfied with the resolution, the final written response will explicitly inform the Player of their right to escalate the matter to an independent Alternative Dispute Resolution (ADR) entity.

4. Escalation to Independent ADR

If the Player is dissatisfied with the Company's final response, the Player may escalate the dispute to an independent **Alternative Dispute Resolution (ADR)** body.

Until a formal list of approved ADR entities is published by the Curaçao Gaming Authority (CGA), SpinBetter cooperates with internationally recognized ADR bodies such as:

- **eCOGRA** (www.ecogra.org)

The ADR process is:

- Free of charge to the Player;
- Independent from the Company;
- Non-binding, unless agreed otherwise.

Once an ADR process is completed, it cannot be recommenced with a different ADR entity. If a Player abandons or drops out of an ongoing ADR process, they forfeit the right to reopen or resurface the dispute at a later date.

The Player must submit the ADR request within **12 months** of receiving the final response from the Company.

The Player must fully exhaust this ADR process before seeking further legal or judicial recourse.

The outcome of the ADR process is the outcome of the ADR process is binding upon the Company. The outcome remains non-binding upon the Player; however, please note that the ADR decision and evidence may be taken into consideration by a court and could affect the course of further legal and judicial recourse.

5. Regulatory Complaints

Complaints regarding regulatory misconduct or license breaches may be submitted directly to the Curaçao Gaming Authority (CGA) at any time.

The CGA does not resolve payout or bet-related complaints but may investigate regulatory misconduct.

The CGA does not mediate individual gaming transactions or overturn internal/ADR decisions unless handled inadequately.

PLEASE NOTE that the CGA does not resolve or make decisions on any Player complaints regarding gambling-related transactions. Furthermore, unless a complaint is deemed to have been inadequately handled, the CGA will not review or overturn decisions made by the Company or the ADR provider. The CGA utilizes provided information solely to support its supervisory and enforcement actions.

6. Final Provisions

This Dispute Resolution Policy is binding on all Players and forms part of the Terms and Conditions.

To ensure regulatory transparency, the Company retains records of unresolved and escalated complaints for a minimum of 5 years and submits required dispute reports directly to the Curaçao Gaming Authority.

SpinBetter reserves the right to update this Policy to reflect changes in law or regulatory practice.

For further questions, contact: **complaints@spinbetter.com**.