

Player Complaints Policy

Company: Turn 1 BV trading as New Wave Poker

Version: 0.3 (Draft)

Effective Date: [TBD]

Status Note (Draft): This policy is a working draft. It will be fully updated to reflect live operational processes, appointed roles, and final vendor selections prior to launch and/or license activation. Any placeholders herein will be completed before go-live, and the final policy will be published on the website and incorporated by reference into the Terms & Conditions.

1. Purpose & Scope

This policy sets out how Turn 1 receives, investigates, resolves, and records player complaints and disputes. It applies to all business units, brands, domains, and customer touchpoints (web, mobile apps, email, chat) where Turn 1 offers games of chance to players under a CGA licence.

1.1 Objectives:

- Provide a transparent, fair, and free complaints process for players.
- Resolve issues promptly and consistently, with priority given to Responsible Gaming (RG) concerns.
- Offer independent Alternative Dispute Resolution (ADR) at no cost to players when internal resolution is not satisfactory.
- Maintain complete records and report to the CGA as required.

2. Definitions

Player interaction: Any written message a player sends to New Wave Poker Support (for example, an inquiry, feedback, or a request for help).

Complaint: A written expression of dissatisfaction about New Wave Poker's services, decisions, terms, or conduct where a response or resolution is expected. For reporting, we

count a complaint when the player submits the Complaint Submission Form or when we escalate a case to ADR.

Dispute: A complaint that remains unresolved after Turn 1's internal process and is escalated internally, to our ADR provider, or to a court.

3. Roles & Responsibilities

- **Designated Complaints Officer (DCO):** Owns this policy and the end-to-end process; ensures independence, quality, and timelines; issues the final internal decision; oversees ADR liaison and reporting. [Name/Title to be confirmed]
- **Customer Support (CS):** First point of contact; triages issues; provides guidance on how to submit a formal complaint; captures and forwards cases to the DCO team.
- **Compliance & RG Team:** Advises on regulatory obligations; prioritises RG complaints; ensures outcomes align with RG policy and player protection standards.
- **Legal Counsel (as required):** Reviews complex cases and ADR positions.
- **Data Protection Officer (DPO):** Ensures compliant handling of personal data related to complaints.
- **Senior Management:** Provides oversight and resources; reviews KPIs and systemic improvements.

4. How Players Can Complain

Eligibility: Only the registered account holder may submit a complaint. Claims cannot be assigned or transferred.

Channels:

- Email: [complaints@newwavepoker.com]
- Online Complaint Submission Form: [URL TBC]

Languages: The complaint form will be available in English and in the primary languages of the New Wave Poker platform.

Cost: The complaints process and ADR are free to players.

Complaint Window: Players may lodge a complaint up to six (6) months from the settlement of the bet or from the incident in question. For peer-to-peer (P2P) games such as poker or for

ante-post fixed-odds betting, the six-month period runs from bet settlement or event conclusion. For in-running betting, prompt submission may be necessary where investigation depends on time-sensitive data.

5. Complaint Submission & Acknowledgement

5.1 Required Information (via the Complaint Submission Form)

- Full name, address, country of residence.
- Registered email and account ID/username.
- Dates: complaint submission and date of the disputed event.
- Category of complaint and narrative description.
- Relevant evidence/attachments (transaction IDs, screenshots, chat logs, etc.).

5.2 Acknowledgement

- **Responsible Gaming complaints:** We will send written acknowledgement within 2 business days with a process overview and indicative timelines.
- **All other complaints:** We will send written acknowledgement within 7 days with a process overview and indicative timelines.

6. Investigation & Resolution Timelines

Our commitment: We resolve complaints quickly and fairly. The timeframes below run from the date we acknowledge your complaint (see Section 5). We will keep you updated throughout.

Responsible Gaming complaints (priority): New Wave Poker will provide a final response within 5 business days. If an exceptional extension is necessary due to case complexity, we will notify you in writing with reasons and a new target date. Any New Wave Poker initiated extension will not exceed 14 calendar days. If we are waiting on information from you, we may pause the clock for up to an additional 14 calendar days; we will tell you when this applies.

All other complaints: New Wave Poker will issue a final response within 4 weeks. For complex cases we may extend once by up to a further 4 weeks; we will tell you why and provide a new target date before the original deadline expires.

If we cannot resolve within the maximum timeframes: We will explain why and inform you of your right to refer the matter to our independent ADR provider, including how to do so.

7. Escalation Stages

Stage 1 – CS Review: CS investigates straightforward issues and seeks prompt resolution; if unresolved or if the player requests, CS advises the player to submit the formal Complaint Submission Form.

Stage 2 – DCO Review: DCO conducts a fair and independent review; may request additional information from the player or internal teams; coordinates any technical or payments investigation.

Stage 3 – Final Internal Decision: The DCO issues a reasoned written outcome (upheld/rejected/partially upheld), including key findings and evidence relied upon. If Turn 1 declines to handle the complaint (e.g., insufficient information after reasonable requests), detailed reasons will be provided.

If the player remains unsatisfied after the final internal decision, they are informed of their right to escalate to ADR (see Section 8).

8. Alternative Dispute Resolution (ADR)

New Wave Poker provides players with free access to an independent ADR service certified by the Curaçao Gaming Authority (CGA). You may use ADR if you are not satisfied with our final response or if we have reached the maximum internal timeframe described in Section 6.

8.1 When you may refer to ADR

- After you receive our final response; or
- If 4 weeks (Responsible Gaming complaints: 5 business days) have elapsed without a final response; or
- If we confirm in writing that no further internal progress is likely.

8.2 How to refer to ADR

- Provider: [CGA-certified ADR provider name to be inserted prior to launch]
- Web: [ADR URL]
- Email: [ADR email]
- Languages supported: [to be inserted]

We will publish these details on:

- Website Complaints page: [URL to be inserted]
- Terms and Conditions: [section reference to be inserted], setting out the ADR pathway and timelines
- Player Support templates/macros used by CS for final-response handoff

8.3 What ADR does

- Provides an independent review under its own rules; may request evidence from you and from New Wave Poker.
- Issues a written decision that is binding on Turn 1. This does not affect your right to pursue the matter in court.
- Free to you; New Wave Poker bears any ADR fees.

8.4 Our obligations to ADR

- Cooperate fully and provide complete case records, logs, and technical evidence.
- Implement remedies required by ADR decisions and confirm completion in writing to you and the ADR. This does not affect your right to pursue the matter in court.
- Record and report ADR referrals in our complaints log and share metrics with the CGA on request.

8.5 Data protection

We share only the data necessary for the ADR review and handle it in line with our Privacy Policy and the ADR provider's data protection terms.

9. Evidence Handling & Fairness

- We will consider all relevant evidence submitted by the player and gathered internally (game logs, transaction records, risk and integrity reviews) and disclose key evidence relied upon, subject to legal and security constraints.
- Investigations into suspected fraud, collusion, money-laundering, botting, or RG concerns may proceed in parallel with the complaints process, but we will avoid

unnecessary delay.

- Decisions will be objective, proportionate, and reasoned.

10. Special Categories (Priority Handling)

- Responsible Gaming & Player Safety (account closures, self-exclusion, cool-offs, limit settings, welfare concerns).
- Financial Issues (deposits, withdrawals, chargebacks, bonus/comp eligibility, currency and FX disputes).
- Game Integrity (alleged collusion, use of prohibited software, chip dumping, tournament disruption, game malfunctions).
- Account & Access (verification/KYC, duplicate accounts, jurisdiction blocks, access restrictions).
- Terms & Conditions / Promotions (interpretation of rules, clarity, fairness of T&Cs).

11. Player Communication Standards

- Use plain, respectful language and avoid legal jargon where possible.
- Provide clear reasons for decisions and reference the specific terms, rules, or evidence considered.
- Confirm any remedies (e.g., bet voids, refunds, goodwill credits) and timelines for execution.

12. Outcomes & Remedies

Turn 1 will issue a final internal response stating whether your complaint is upheld, partially upheld, or not upheld, with reasons and supporting evidence. This is our internal outcome and does not prevent you from referring your case to ADR as set out in Section 8. Our decision will state whether the complaint is upheld, partially upheld, or not upheld, with reasons and evidence. Where appropriate we will apply one or more of the following remedies:

1. Account actions: warnings; corrections to limits; adding Responsible Gaming tools; temporary or permanent restrictions or closure.

2. Financial adjustments: refunds/voids of affected bets or game entries; crediting or paying missed winnings; rake/fee reversals or jackpot contribution corrections; tournament or payout recalculations where the rules require (for example, cancellation policies).
3. Technical or operational fixes: bug fixes; rule or content clarifications; process changes; staff coaching.
4. Promotions and bonuses: reinstate fair entitlements; remove misapplied restrictions; cancel invalid awards.
5. Goodwill gestures: discretionary credits or service gestures where appropriate. These do not admit liability and do not affect your right to ADR or court.

13. Record-Keeping & Reporting

- Maintain a complete case file for 5 years from closure, including submissions, correspondence, evidence, decisions, and outcomes.
- Maintain a complaints log with KPIs: volumes, categories, turnaround times, upheld rates, RG flags, repeat complaints.
- Provide periodic and ad-hoc reports to the CGA as requested.

14. Data Protection & Confidentiality

Handle personal data per our Privacy Policy and applicable data protection laws. Share information only as necessary for investigation, ADR, regulatory reporting, or legal obligations.

15. Complaint Categories (for form selection)

1. Responsible Gaming & Player Safety
2. Financial (deposits/withdrawals/bonus)
3. Game Integrity & Fairness
4. Account & Access (KYC/verification)
5. T&Cs / Promotions
6. Other (free-text)

16. Conflicts of Interest

Complaints will be reviewed by personnel independent of the original decision-maker. The DCO may reassign a case where a conflict exists.

17. Vulnerable Persons

Where vulnerability is identified or suspected, the DCO may accelerate handling, involve RG, and adapt communications.

18. Policy Governance (Internal)

- Owner: Designated Complaints Officer
- Review Cycle: At least annually, and immediately on material regulatory or operational change.
- Change Control: Versioned; changes tracked with rationale.

19. Draft Status & Go-Live Readiness

This is a draft policy. It will be fully updated prior to launch, including:

- Named DCO and deputies; contact details and mailbox routing.
- Confirmed ADR provider(s) and their process/SLAs.
- Finalised player-facing copy for website (Complaints page) and app.
- Integrated workflows in CRM/CS tools; training materials.

20. Player-Facing Summary

We will publish a concise, plain-English summary for players that explains:

1. How to complain, with links to the form and contact options.
 2. What happens next, with expected timelines.
 3. What to do if they're not satisfied (ADR).
 4. That the process is free.
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