

ApexBet

Player Complaints Policy

1. Purpose and Scope

This Player Complaints Policy sets out the procedures by which ApexBet Gaming N.V. (hereinafter referred to as "ApexBet") handles player complaints and disputes in a transparent, fair, and timely manner.

This Policy is established in accordance with the National Ordinance for Games of Chance (LOK), Article 5.3, and the applicable guidelines issued by the Curaçao Gaming Authority (CGA).

This Policy applies to all players using the ApexBet platform and covers complaints relating to ApexBet's services, decisions, terms and conditions, and gaming operations.

2. Definitions

Player Interaction

Any written communication initiated by a player to ApexBet's customer support team, including general inquiries, requests for assistance, or feedback.

Complaint

A written expression of dissatisfaction by a player regarding ApexBet's services, decisions, conduct, or terms and conditions, where the player expects a response or resolution.

For the purposes of this Policy, a complaint is considered formal once submitted through the designated complaints process or complaint form.

Dispute

A complaint that has not been resolved to the player's satisfaction through ApexBet's internal complaints handling process and is escalated to an independent Alternative Dispute Resolution (ADR) provider or other external resolution mechanism.

3. Eligibility and Time Limits

1. This Policy applies to complaints arising after the settlement of a bet or gaming event.
 2. Players may submit a complaint within **six (6) months** from the date of settlement of the relevant bet or event.
 3. For live betting or in-play betting, the complaint period begins upon settlement or completion of the relevant event.
 4. Complaints may only be submitted by the registered account holder and not by third parties.
-

4. Submission of Complaints

1. Players are required to submit complaints in writing through ApexBet's customer support channels, including email or other designated contact methods.
 2. ApexBet provides a standard complaint submission form, which may be made available online or as a downloadable document.
 3. The complaint form includes, at a minimum:
 - Player's name and contact details;
 - Account identifier (where applicable);
 - Date of the complaint and date of the relevant event;
 - Description of the complaint and relevant category;
 - Any supporting documentation or evidence (optional).
 4. Complaint forms are made available in English and, where applicable, in the language used by the player.
-

5. Internal Complaint Handling Process

5.1 Acknowledgement

1. ApexBet acknowledges receipt of a complaint within **two (2) business days** of receipt.
 2. The acknowledgement confirms receipt of the complaint and provides an overview of the complaint handling process and expected timeframe.
-

5.2 Responsible Gaming Complaints

1. Complaints relating to responsible gaming matters or player protection are treated as a priority.
 2. Where additional investigation is required, ApexBet informs the player of the reason for any delay.
 3. Responsible gaming complaints are resolved as promptly as possible and, where feasible, within **two (2) weeks**.
-

5.3 Other Complaints

1. Complaints not related to responsible gaming are assessed and responded to within **four (4) weeks**.
 2. Where the investigation requires additional time due to complexity or missing information, ApexBet may extend the response period once, for a maximum of an additional **four (4) weeks**, and will notify the player accordingly.
-

6. Complaint Outcome and Closure

1. ApexBet provides the player with a written final response, which includes:
 - A reasoned explanation of the outcome, based on the facts and evidence reviewed; or
 - Where applicable, an explanation of why the complaint cannot be processed, including details of any missing information.
 2. Where the complaint is upheld, ApexBet takes appropriate corrective action in accordance with its internal policies and applicable terms and conditions.
-

7. Escalation to Alternative Dispute Resolution (ADR)

1. If a player is not satisfied with the outcome of the internal complaint handling process, the player may escalate the dispute to an independent Alternative Dispute Resolution (ADR) provider recognised by the Curaçao Gaming Authority.
 2. ADR services are provided **free of charge** to the player.
 3. ApexBet maintains agreements with one or more CGA-recognised ADR providers, and details of the applicable ADR process are made available to players.
 4. The ADR procedure and relevant contact details are included in ApexBet's Terms and Conditions.
 5. Participation in ADR does not affect the player's statutory right to seek legal remedies through the courts, unless otherwise agreed by the parties.
-

8. Record Keeping and Reporting

1. ApexBet maintains records of all complaints and disputes, including outcomes and correspondence, for a minimum period of **five (5) years**, or longer where required by applicable law.
 2. ApexBet submits aggregated complaints data to the Curaçao Gaming Authority in accordance with regulatory reporting requirements, including reports due on **15 January** and **15 June** each year.
 3. Reports include, where applicable:
 - Total number of complaints received;
 - Number of resolved and rejected complaints;
 - Number of unresolved complaints;
 - Categorisation of complaints by type;
 - Number of cases escalated to ADR;
 - Number of cases subject to judicial proceedings.
-

9. Availability of the Policy

1. This Player Complaints Policy is made available on ApexBet's website or through other easily accessible means.
2. Information on how to submit a complaint, expected handling timeframes, and escalation options is clearly communicated to players.

3. ApexBet makes clear that the Curaçao Gaming Authority does not intervene in individual player disputes, but players may contact the CGA regarding regulatory matters.
-

10. Review and Updates

This Policy is reviewed periodically and updated where necessary to reflect changes in applicable laws, regulatory guidance, or ApexBet's operational practices.