



Customer Complaints Handling Policy

IN-COM-023-01

Definitions

Company: Vavada B.V., registered under number 143168 with its address at Hanchi Snoa 19, Trias Building, Curaçao

Complaint: A formal request submitted by a customer to resolve a dispute or issue arising during the use of the Vavada.com (hereinafter the “Website”) services, including but not limited to financial transactions, game-related issues, or customer support concerns.

Customer: A registered user of the website who has agreed to the Terms and Conditions and whose account is active or has been previously active.

Live-chat: The official communication system used by the Website for real-time interaction with customers, including complaint intake, support consultation, and responsible gaming disclosures.

Support Team: Frontline Customer service representatives responsible for initial communication with users, identification of complaints, and, where applicable, escalation to specialized departments.

Escalation: The process of referring a complaint or issue to a Company’s more senior member of staff, or specialized department, or third party (e.g., Financial Operations, Legal Department, Game Provider, Regulator).

Gambling Addiction / Gambling Disorder: A behavioral condition recognized as problematic gambling, whether self-disclosed by the Customer or assumed by the Company based on specific patterns or wording, subject to responsible gaming procedures.

Self-Exclusion: A voluntary or by Company initiated restriction placed on a customer's account due to gambling addiction, either permanently or for a specified time period, during which the customer is prohibited from accessing services.

Regulator: The Curaçao Gaming Authority (CGA), or any other appointed licensing body responsible for supervising compliance of the Company with gaming regulations.

Operations Control (OC): An internal team at Website responsible for supervising sensitive account actions, including escalated complaints, repeated cases of self-exclusion, and regulatory interactions.

1. General Provisions

1.1. This Policy governs the handling of customer Complaints arising from the use of services provided on the Website.

2. Submission of a Complaint

2.1. A complaint shall be submitted either via the Live-chat or in writing to the following email address: admin@vavada.net.

3. Registration and Review of Complaints

3.1. Complaints shall be reviewed within 3 business days from the date of receipt, except in cases where additional investigation is required.

3.2. If additional time is needed, the customer shall be informed of the extended review period.

3.3. Additional information or clarification may be requested from the customer during the review process.

4. Response and Appeals

4.1. Upon completion of the review, the customer will receive a written response outlining the outcome and action taken (if applicable).

4.2. If the customer disagrees with the outcome, he/she may submit an appeal. Appeals will be reviewed by a designated officer within 5 business days.

4.3. If the complaint remains unresolved, the customer may seek an alternative dispute resolution in a form approved by Regulator and/or other legal remedies provided under the laws of Curaçao.

5. Record Keeping and Confidentiality

5.1. All complaint-related records and correspondence shall be retained for a minimum of 5 years from the date of the last communication.

5.2. All complaints are treated confidentially and are accessible only by authorized personnel of the Company and/or when disclosure is required by the applicable law or Regulator's requirements.

6. Internal Classification and Escalation Procedures

6.1. All complaints are initially categorized based on two primary parameters:

6.1.1. Operational complaints directed to Support team;

6.1.2. Legal or regulatory complaints, including pre-litigation notices, third-party Customer representation, or regulatory inquiries.

6.2. Complaints are further classified by subject matter:

6.2.1. Financial issues (e.g., deposit or withdrawal problems);

6.2.2. Game-related issues (e.g., uncredited winnings, erroneous deductions, technical malfunctions);

6.2.3. Account breaches (e.g., third-party access and resulting financial loss);

6.2.4. Incorrect support guidance (e.g., misinformation from support agents);

6.2.5. Bonus-related dissatisfaction (e.g., canceled bonuses, loss of bonus balance).

6.3. Handling procedures per issue type:

6.3.1. Financial and account breach cases may be escalated to the Financial Operations (FO) team for assistance.

6.3.2. Game or technical issues are escalated to the game provider and verified internally.

6.3.3. Bonus disputes and support communication complaints are reviewed and resolved internally by the support team lead.

6.4. Any complaint accompanied by a pre-litigation claim or regulatory involvement is escalated to the Legal Department for joint response.

6.5. First-line support staff have limited authority to resolve disputes and must escalate applicable cases to support team lead.

7. Responsible Gaming and Customer Self-Exclusion

7.1. The Company is committed to responsible gaming and takes all necessary measures to identify and block accounts of Customers who demonstrate signs of gambling addiction.

7.2. Types of self-exclusion and addiction-related blocks include:

7.2.1. Permanent self-exclusion due to addiction, initiated by the Customer, without the right to restore the account.

7.2.2. Time-limited self-exclusion, initiated by the Customer, indicating a specific term (e.g., 1 week, 1 month).

7.2.3. Block due to addiction assumed by the Company, based on the Customer's statements or behavior.

7.2.4. Block due to permanent account deletion requests, where addiction is explicitly mentioned.

7.3. In all above cases, the account is blocked with the appropriate internal flag, and the Customer is notified using standardized Live-chat system templates, modified according to the Customer's wording. Any remaining balance is handled in accordance with the Company's policies.

7.4. Full correspondence with Customer, Customer's data, and admin panel block screenshots shall be saved and transferred to the designated internal database of Live-chat for further validation.

7.5. Escalation and approvals:

7.5.1. Support staff with less than 6 months of tenure shall obtain team lead approval for all addiction-related blockings.

7.5.2. Senior staff may block accounts independently, except in ambiguous cases requiring clarification.

7.5.3. In cases of repeated self-exclusion due to addiction, the case is referred to the Operations Control department (OC).

7.6. Procedure of verification of Customer requests via email to admin@vavada.net:

7.6.1. If the request email matches the account data, the account may be blocked.

7.6.2. If only a username is provided, further identity verification may be required.

7.6.3. If no account is associated with the email, the Customer is referred to the Website's Live-chat.

7.7. Account reinstatement after a self-exclusion procedure is only considered after 4 months and requires:

7.7.1. Identity verification in compliance with applicable Company's policies, and

7.7.2. Confirmation from the Customer that they no longer exhibit problematic behavior, and

7.7.3. Signing a formal statement of no addiction (template provided).

All such requests must be initially reviewed by the team lead and passed to the OC department for approval. The final decision rests with the finance or legal team, depending on the case.

7.8. Additional instructions exist for handling duplicate accounts, dealing with uncredited deposits before a block, and applying changes in addiction protocols without compromising responsible gaming safeguards.