

Player Complaints Policy

1. Purpose & Scope

1.1 Purpose

The purpose of this Player Complaints Policy is to ensure that all Weeekly players have access to a fair, transparent, and timely process for submitting, reviewing, and resolving complaints related to any aspect of the platform's services.

This policy outlines the procedures, responsibilities, and standards that guide how Weeekly receives, investigates, and addresses player concerns to maintain trust, regulatory compliance, and high-quality service.

The objectives of this policy are to:

- Provide a clear, accessible process for players to file complaints.
- Ensure all complaints are treated with impartiality, professionalism, and confidentiality.
- Resolve complaints quickly and effectively, with documented outcomes.
- Comply fully with Curaçao Gaming Authority (CGA) expectations for complaint handling.
- Ensure that all issues raised by players contribute to ongoing platform improvements.

1.2 Scope

This Policy applies to all Weeekly brands, platforms, environments, products, features and wagering services offered by the Company under the “Weeekly” umbrella, including any games or services provided by licensed third-party game providers, platform aggregators or external casino software suppliers. All such suppliers form part of the operational scope of this Policy and may be involved in resolving relevant gameplay or outcome disputes.

A. Weeekly

Includes:

- Weekly raffle draws and prize pool events
- Ticket purchases, ticket bundles, and ticket bonuses
- Virtual coin-based casino-style gameplay
- In-platform wagering using Weeekly Coins
- Prize allocation, draw results and winner confirmation
- Weekly prize resets and event cycles
- Bonus ticket eligibility and conversion rules

Operational considerations include:

- random draw procedures
- ticket probability and allocation
- prize distribution
- fairness, RNG, and dispute handling
- ticket conversion rules
- in-platform wagering reporting

B. Weeekly Rivals

Includes:

- Competitive wagering events

- Leaderboards and tournament-style scoring
- Fixed starting coin balances
- Coin wagering within eligible games
- Prize allocation based on leaderboard results
- Weekly performance tracking and reporting

Coverage includes:

- gameplay performance disputes
- leaderboard corrections
- gameplay manipulation or collusion
- fairness in game outcomes
- prize allocation, verification, and payout rules

C. Weeekly Casino

Includes:

- Real-money casino gameplay
- Wagering within all casino games
- Real-money deposits and withdrawals (including third-party payment providers)
- Provider game outcomes, fairness, and result verification
- Bonus, promotion, and free-play offers where applicable

Coverage includes:

- provider game disputes
- withdrawal verification
- AML screening requirements
- Real-money wagering rules
- payout eligibility

D. Associated Services and Operational Layers

This Policy also applies to:

- account creation and registration
- age and eligibility verification
- geo-restriction enforcement
- AML/CFT controls
- responsible gaming tools
- sanctions screening
- identity verification and KYC procedures
- platform incident reporting
- account restrictions and suspensions
- prize distribution (virtual or real-money)

E. Cross-Platform Functionality

This Policy covers all environments where players:

- acquire tickets
- wager coins
- wager USDT
- earn, win, or convert value
- participate in raffles or competitions
- receive prize allocations
- interact with any proprietary Weeekly wagering feature

This includes:

- platform events
- prize pools
- in-game rewards
- special promotions
- bonus programs
- tournaments
- competitions
- data processing
- dispute resolution

1.3 Who This Policy Applies To

This policy applies to:

Players

Any registered player on Weeekly platforms who wishes to lodge a complaint regarding:

- Account management
- Deposits or withdrawals
- Game fairness or results
- Raffle entry issues
- Technical or service problems
- Alleged breaches of Terms & Conditions
- Responsible gaming concerns
- Fraud or suspicious activity impacting them

Staff

All Weeekly personnel involved in:

- Customer support
- Compliance & AML
- Technical support
- Payment and verification teams
- Management responsible for escalated cases

All staff handling complaints must:

- Follow the procedures outlined in this policy
- Document all actions and findings

- Maintain professional and unbiased conduct
- Protect player data privacy

1.4 Complaint Channels Covered by This Policy

This policy governs any complaint submitted via:

- Official support email (support@weeekly.com)
- Contact form via [Weeekly.com](https://www.weeekly.com), which consists of:
 - Live Support
 - Help Center
- Regulatory referrals via the Curaçao Gaming Authority

Only complaints submitted through official channels will be processed formally.

1.5 Regulatory Alignment

This policy aligns with:

- Curaçao Gaming Authority's complaint handling requirements
- Responsible gaming principles
- AML/CFT reporting expectations (where complaints overlap)
- Consumer fairness and dispute resolution best practices
- Internal Weeekly Terms & Conditions

2. Definitions

The following definitions apply throughout this Player Complaints Policy. These terms ensure clarity, consistency, and compliance with Curaçao Gaming Authority (CGA) standards.

2.1 Complaint

A Complaint is any expression of dissatisfaction raised by a player regarding Weeekly's services, platform functionality, outcomes, policies, or staff interactions.

A complaint may relate to account access, payments, perceived unfairness, delays, or general service issues.

2.2 Dispute

A Dispute is a complaint that escalates because the player is not satisfied with the response or resolution provided by Weeekly, or where the subject matter relates to legally or financially significant issues (e.g., game fairness, balance discrepancies, prize calculations, or denied withdrawals).

A dispute requires formal review by the Compliance Team and may be reported externally to the CGA if unresolved.

2.3 Game Outcome Complaint

A Game Outcome Complaint concerns:

- The result of a casino game session
- RNG-based outcomes
- Raffle ticket results
- Prize pool distributions
- Rivals' scoring or leaderboard calculations
- Third-party connected game outcomes

These complaints typically arise when a player believes the result was incorrect, unfair, manipulated, or inconsistent with platform rules.

2.4 Financial / Withdrawal Complaint

A Financial Complaint relates to any monetary or crypto-related issue, including:

- Deposits not appearing
- Withdrawals delayed, rejected, or reversed
- Balance discrepancies
- Bonus credit calculations
- Transaction screening delays (AML, sanctions, mixer-related)
- Incorrect fee deductions
- Wallet address or blockchain-related concerns

These must be reviewed in coordination with Finance and AML staff.

2.5 Account-Related Complaint

An Account-Related Complaint includes issues relating to:

- Login, MFA, or access problems
- Incorrect personal details
- Account verification (KYC) delays
- Account suspensions or restrictions
- Self-exclusion or responsible gaming controls
- Device or IP flagging

These require support team assistance and may require a compliance review.

2.6 Fraud or Integrity Allegation

A Fraud or Integrity Allegation is any complaint or report where a player claims:

- Another user is cheating
- A game, competition, or leaderboard has been manipulated
- Collusion or multi-accounting occurred
- Botting or automated play
- Exploit use or prize manipulation
- Money laundering suspicions
- Staff misconduct

These complaints must receive the highest-priority escalation to the AML/Compliance Officer and Security team.

2.7 Regulatory Complaint

A Regulatory Complaint is a complaint where a player explicitly indicates intent to escalate to the Curaçao Gaming Authority or requests assistance contacting the regulator.

These must be forwarded to Senior Management and documented thoroughly.

2.8 Evidence

“Evidence” refers to documentation or records used to evaluate a complaint, including:

- Gameplay logs

- Transaction records
- Chat transcripts
- Screenshots provided by the player
- AML screening results
- Backend system logs

2.9 Resolution

A Resolution is the final decision or action taken by Weeekly to resolve a complaint or dispute, communicated clearly and promptly to the player.

3. How a Player Can Submit a Complaint

Weeekly ensures that all players can submit complaints easily, freely, and without any barriers. Complaints may relate to raffle outcomes, casino gameplay, Rivals competitions, account issues, withdrawals, deposits, bonuses, or any interaction with the platform.

Complaints can be submitted at no cost to the player.

This section explains every approved method of submission and the information required for proper investigation.

3.1 Accepted Submission Channels

Players may submit complaints through any of the following channels:

3.1.1 Email Submission

Players can send their complaints to:

support@weeekly.com

This is the primary address for all customer service and complaint-related matters.

3.1.2 In-Platform Support Form

A complaint can be submitted directly within the Weeekly platform through the Help / Support section.

The form automatically captures relevant system metadata to assist the investigation.

3.2 Required Information From the Player

To ensure accurate and timely handling of complaints, players must provide the following details when submitting a complaint:

- **Full name** (as registered on the account)
- **Registered email address**
- **Account ID / username**
- **Description of the issue**, including:
 - What happened
 - What the expected result was
 - Any steps already taken
- **Date and time of the incident**
- **Relevant transaction IDs**, game round IDs, or draw IDs
- **Any supporting documentation**, such as:
 - Screenshots
 - Receipts
 - Email confirmations
 - Chat logs

- Blockchain transaction hashes

Players should submit as much detail as possible for a smooth investigation.

3.3 Free Access to the Complaints Process

Weeekly guarantees:

- **No fees**, charges, or conditions to submit a complaint
- **No requirement** for the player to deposit additional funds
- **No disadvantage** or restriction is imposed on players who file complaints
- **Full cooperation** regardless of account balance or status

All players must have equal access to complaint resolution.

3.4 Confirmation of Complaint Receipt

Upon receiving a complaint, Weeekly will:

- Send an acknowledgement email confirming receipt
- Provide a ticket number for tracking
- Outline the next steps and expected timeline
- Request any missing information needed for the investigation

4. Acknowledgement of Complaint

To ensure transparency and trust, Weeekly will promptly acknowledge all player complaints submitted through any approved channel.

4.1 Acknowledgement Timeframe

- Weekly must acknowledge receipt of a complaint within 24 hours of submission.
- Acknowledgement may be sent automatically (via support system) or manually by a support agent.
- The acknowledgement does not constitute a resolution; it only confirms receipt.

4.2 Unique Reference Number

- Each complaint must receive a unique reference number (ticket ID).
- This reference number must be used for:
 - Tracking progress
 - Internal escalation
 - Providing updates to the player
 - Auditing and regulatory reporting

4.3 Information Included in the Acknowledgement

The acknowledgement must contain:

- Confirmation that the complaint has been received
- The assigned ticket ID
- A summary of the complaint as submitted
- The expected investigation timeline
- Information on what the player may need to provide (if anything)
- Instructions not to submit duplicate complaints using multiple channels

- Contact information for follow-up

4.4 No Charges or Fees

- Players must not be charged for submitting a complaint
- Complaints must remain accessible to all users, including those in dispute or with suspended accounts (pending investigation)

4.5 Logging & Internal Tracking

Upon acknowledgement:

- The complaint must be entered into Weeekly's internal complaint management system
- The system must record:
 - Submission channel
 - Player details
 - Nature of the complaint
 - Assigned agent
 - Time of acknowledgement

This ensures accurate audit trails and compliance with CGA expectations.

5. Investigation Process

Weeekly is committed to conducting fair, thorough, and unbiased investigations into all complaints submitted by players.

All investigations must be completed promptly, accurately, and in accordance with Weeekly's Terms & Conditions, technical audit logs, and regulatory obligations under the Curaçao Gaming Authority (CGA).

Investigations apply to all complaint types, including:

- Game outcomes (including spin, reel, card, and round results)
- RNG fairness and result verification
- Raffle ticket allocation or draw fairness
- All Weeekly Rivals mechanics and leaderboard results
- Deposits, withdrawals, and prize payouts
- Account access, security, or identity verification
- Suspected fraud, collusion, or integrity issues
- Responsible gaming account restrictions
- Alleged system malfunction, outage, or server failure
- Licensed third-party provider or aggregator errors
- Bonus, promotion, or free-spin awarding discrepancies
- Miscalculations of winnings or prize allocations

5.1 Initial Review

Upon receiving a complaint:

Weeekly must:

- Validate player identity
- Confirm the details provided
- Retrieve the complaint reference number

- Assign the case to a trained investigator or specialist (Support Lead, Compliance, or Technical Team, depending on complaint category)

If the information submitted is incomplete, Weeekly may request additional details before a formal investigation begins.

5.2 Investigation Components

Each complaint must be reviewed using objective evidence from multiple logged sources.

The investigation may include, but is not limited to, the following steps:

5.2.1 Review of Account History

- Login history
- IP/device consistency
- Recent gameplay or betting activity
- Account restrictions or locked status
- Bonus usage or wagering progress

5.2.2 Gameplay Log Analysis

Depending on the product:

Weeekly

- Ticket allocation logs
- Timestamp of purchase/entry
- Draw randomization logs
- Prize pool integrity checks
- Spin results and RNG outcome references
- Anti-cheat and anomaly detection flags

- Bonus rounds, features, or multipliers triggered
- Round-by-round game logs

Weekly Rivals

- Wagering logs
- Coin allocation
- Leaderboard score calculations
- Detection of unusual gameplay
- Anti-cheat and anomaly detection flags
- Spin results and RNG outcome references
- Bonus rounds, features, or multipliers triggered
- Round-by-round game logs

Weekly Casino

- Round-by-round game logs
- Spin results and RNG outcome references
- Bonus rounds, features, or multipliers triggered
- Game session reconstructions

Where games are supplied by licensed third-party providers or aggregators, technical verification must be based on official provider logs and audit data, and such records may be used as the final basis for determining the outcome.

5.2.3 System & Backend Verification

The investigator must review:

- Admin panel logs
- Player balance adjustments
- Manual interventions (if any)
- Account status changes
- Withdrawal approval records
- Prize pool changes
- Relevant SIEM/security logs

5.2.4 Financial & Blockchain Transaction Checks

For any wallet, deposit, withdrawal, or USDT-related complaint:

- Blockchain transaction IDs
- Wallet-to-wallet transfer confirmation
- Screening results (AML, sanctions, mixer flags)
- Internal ledger entries
- Custody provider logs
- Withdrawal queue logs
- Transaction timestamps and settlement status

This ensures the financial component of the complaint is fully verified.

5.2.5 Game Provider Verification

If a complaint relates to game fairness, outcomes, functionality, or an alleged malfunction, Weeekly must request technical game logs and audit data from the relevant licensed game provider and/or platform aggregator supporting the affected product.

The provider or aggregator must confirm:

- accuracy of the game outcome
- RNG integrity and result derivation
- absence of malfunction or technical error
- whether any rollback or dispute was previously recorded
- overall session integrity

Final provider findings must be incorporated into the investigation and may be relied upon as the basis for determining the complaint outcome.

This step is mandatory for all disputes involving game results or game functionality supplied by third-party providers.

5.2.6 Terms & Conditions Compliance Check

Investigators must confirm:

- Whether the player followed the rules
- Whether wagering requirements or game rules were met
- Whether any prohibited conduct occurred (multi-accounting, bonus abuse, manipulation)
- Whether promotional terms apply
- Whether any restriction justifies the platform's decision

5.3 Additional Information Requests

If required, Weeekly may contact the player to request:

- Screenshots
- Transaction IDs
- Bank or wallet records
- Proof of identity (if necessary to verify account ownership)
- Additional explanation of events

Players must be given a reasonable time to respond before the investigation proceeds.

5.4 Evidence-Based Decision

All decisions must:

- Be based on verifiable logs and technical evidence
- Do not rely on assumptions or subjective judgment
- Align with Weeekly's Terms & Conditions and internal policies
- Be approved by a senior member of Support, Compliance, or Technical Team (depending on case type)

If the complaint is valid, corrective action must be taken promptly (refund, prize correction, bonus reinstatement, or other resolution).

5.5 Documentation & Recordkeeping

A complete investigation file must be maintained, including:

- All complaint details
- Communication with the player
- Logs and evidence reviewed
- Third-party responses
- Final resolution
- Investigator notes
- Timestamps of each step

These must be retained for a minimum of five 5 years.

5.6 Cooperation With Regulators

If the investigation indicates:

- A systemic issue
- A significant malfunction
- A material financial error
- A breach of fairness obligations
- A security or integrity incident
- A player escalating to the CGA

Weeekly must provide full cooperation, documentation, and transparency to the Curaçao Gaming Authority.

6. Response Timeline

Weeekly is committed to providing fair, transparent, and timely resolutions to all player complaints. Clear timelines ensure complaints are handled efficiently and in compliance with Curaçao Gaming Authority (CGA) standards.

6.1 Initial Response Timeline

- Weeekly will provide an initial response within 48 hours of receiving the complaint.
- This response may:
 - Confirm that the complaint has entered the investigation phase
 - Request additional information (if required)
 - Provide the player with their unique complaint reference number (if not already provided)
 - Outline the expected resolution timeframe

6.2 Full Investigation Timeline

- Weeekly aims to complete all investigations and deliver a final response within 7–14 days, depending on complexity.
- The final response will:
 - Summarize findings
 - Provide supporting evidence where relevant (e.g., game logs, provider verifications)
 - Reference the applicable Terms & Conditions, game rules, or system logs
 - Communicate the decision clearly and fairly

6.3 Cases Requiring Additional Time

Some complaints may require more time due to:

- Complex financial reconciliation
- Involvement of third-party game suppliers
- Cross-checks with AML/KYC compliance
- Blockchain transaction verification
- Extensive gameplay review or multi-session audit
- Need to review logs across multiple systems

In these situations:

Weeekly must:

- Notify the player before the 14-day window expires
- Provide a clear reason for the delay
- Give an updated estimated completion time
- Continue providing updates every 7 days until resolution

6.4 Urgent or High-Risk Cases

Complaints involving:

- Suspected fraud
- Stolen accounts

- Unauthorized access
- Wallet compromise
- Technical malfunctions affecting multiple players

...may trigger priority handling and accelerated investigation timelines, with immediate escalation to:

- The Security Officer
- AML Compliance Officer
- Game provider representatives

In these cases, Weeekly will aim to respond significantly faster than standard timelines.

6.5 Closure of Complaint

A complaint is considered closed when:

- A final resolution has been provided to the player
- Evidence or logs have been documented and stored
- Any corrective actions (refunds, system fixes, communication updates) have been completed
- Internal teams have been notified of any procedural or technical learnings

Players will be informed that the complaint has been formally closed and provided with instructions on next steps if they disagree with the outcome (e.g., external dispute resolution bodies, if applicable).

7. Types of Complaints & How They Are Handled

Weeekly categorizes complaints into defined types to ensure each is investigated using the correct procedures, technical checks, and compliance requirements.

This ensures consistency, fairness, and full alignment with Curaçao Gaming Authority standards.

Each complaint type below includes the investigation steps, responsible teams, and possible outcomes.

7.1 Game Outcome Complaints

These complaints arise when a player believes a game result, spin, wager, or leaderboard outcome is incorrect or unfair.

Investigation Steps

- Retrieve and review RNG logs and gameplay data
- Review the player's wagering history, including timestamp, bet amount, and game state
- Confirm results using API logs or direct supplier logs
- Compare the player's session to system-level data to ensure consistency
- Verify that no latency, connectivity, or system interruption affected the outcome
- Check if any known technical issue was reported during the session

Possible Outcomes

- If the game result is confirmed correct → provide a detailed explanation
- If an error is identified →
 - Re-credit the player appropriately
 - Inform the provider

- Log the malfunction and escalate to the technical team

7.2 Withdrawal / Financial Complaints

These relate to deposits, withdrawals, delays, reversals, or balance discrepancies.

Investigation Steps

- Review deposit/withdrawal logs on the Weeekly backend
- Confirm AML screening results for high-risk indicators
- Check wallet address accuracy and the player's withdrawal history
- Verify blockchain confirmations and transaction status
- Confirm multi-signature approval (for Tier 2–4 withdrawals)
- Ensure no holds or restrictions were placed due to risk alerts
- Check if the withdrawal was blocked due to:
 - Incorrect wallet address
 - Sanctions exposure
 - Mixer detection
 - Identity mismatch
 - Unusual velocity or pattern

Possible Outcomes

- Successful resolution with withdrawal processed
- Withdrawal re-initiated

- Player informed of AML/security restrictions (if applicable)
- Request additional verification (EDD) if high-risk behaviour is detected

7.3 Account Complaints

These include issues with login, registration, verification, account access, or administrative actions such as suspensions or locks.

Investigation Steps

- Verify the player's identity and account ownership
- Check login logs, device fingerprints, and login attempt history
- Review account status (active, locked, restricted)
- Check verification/KYC progress with the identity vendor
- Review automated risk rules for flags or restrictions
- Provide clear information on what documentation or steps are required

Possible Outcomes

- Account reactivated
- Account reinstated after successful KYC verification
- Player instructed to submit missing documentation
- Account restriction maintained (in cases of risk, fraud, or AML concerns)

7.4 Fraud or Fairness Allegations

These complaints involve claims of cheating, collusion, bot usage, gameplay manipulation, or exploitation.

Investigation Steps

- Conduct a risk and behavioural analysis of the account
- Review:
 - Device IDs
 - IP logs
 - Geolocation signals
 - Account linking indicators
- Check for:
 - Multiple accounts controlled by the same person
 - Bonus abuse
 - Exploiting mechanics
 - Use of automated tools or bots
 - Suspicious wagering patterns or cycling
- Review all AML flags or unusual transaction behaviours
- Cross-reference other accounts suspected of being involved

Possible Outcomes

- Player cleared of wrongdoing
- Account corrected or unlocked

- Cheating confirmed → account suspension and confiscation of fraudulent winnings
- Case escalated to Compliance, and record retained for future monitoring

7.5 Responsible Gaming Complaints

These complaints relate to self-exclusion, cooling-off periods, betting limits, or concerns about gambling behaviour.

Investigation Steps

- Review the player's responsible gaming settings
- Check if a self-exclusion request was properly applied
- Verify the status of deposit/loss limits
- Confirm whether any relapse occurred due to system or human error
- Ensure full compliance with Weeekly's Responsible Gaming Policy
- Escalate urgent cases where the player expresses harm

Possible Outcomes

- Immediate application or correction of limits
- Activation of self-exclusion (temporary or permanent)
- Guidance provided on responsible gaming tools
- If necessary, referral to professional support services
- Logging and escalation to the Responsible Gaming Officer

7.6 General Complaints

These include issues regarding customer service, unclear terms, delays in response, or any non-technical grievances.

Investigation Steps

- Review the interaction history
- Speak with the support agent involved (if applicable)
- Clarify or correct any misunderstanding
- Provide policy-based explanation where relevant

Possible Outcomes

- Apology & clarification (if a misunderstanding occurred)
- Process or communication improvement internally
- Escalation to a senior support manager for review
- Issue resolved with an explanation to the player

8. Escalation Process

If a player is not satisfied with the initial outcome of their complaint, Weeekly provides a structured and transparent escalation procedure to ensure fairness, independence, and proper oversight.

This escalation framework applies to all complaints relating to:

- Game outcomes
- Withdrawals or deposits

- Account actions (suspensions, verification holds, login issues)
- Fraud or fairness allegations
- Responsible gaming concerns
- Any issue involving player rights under Weeekly's Terms & Conditions

8.1 Internal Escalation (Stage 1)

If the player disagrees with the initial resolution:

- The complaint must be escalated to a Senior Complaints Officer or Team Lead not involved in the original response.
- The Senior Officer must:
 - Review all materials independently
 - Re-check logs, data, and correspondence
 - Verify that policies were correctly applied
 - Ensure no bias or oversight occurred
- A new decision must be issued, with a clear explanation of how the conclusion was reached.

8.2 Segregation of Duties (Stage 2)

To ensure fairness and independence:

- A second staff member, not connected to either the original case or the first review, must verify the decision.

- This ensures:
 - No conflict of interest
 - Transparency
 - Independent validation of findings

This second reviewer may be a member of the Compliance, Risk, or Quality Assurance teams, depending on the nature of the complaint.

8.3 Final Internal Decision (Stage 3)

After the second review:

- Weeekly will issue a final internal decision in writing.
- The decision must:
 - Clearly outline the findings
 - Reference relevant Terms & Conditions or policies
 - State whether compensation, refund, or reversal is due
 - Provide a closing summary for the player

This final internal decision closes Weeekly's internal review process.

8.4 External Escalation (If Applicable)

If, after receiving the final internal decision, the player remains unsatisfied:

- Weeekly must inform the player of any external dispute resolution mechanisms available under Curaçao regulations.

- Depending on CGA's licensing category, the player may be directed to:
 - The Curaçao Gaming Authority (CGA) complaints portal
 - The Master License holder's dispute resolution channel (if applicable)
 - An independent ADR (Alternative Dispute Resolution) body, if mandated

Weeekly must clearly inform the player of:

- How to file the external complaint
- What information do they need
- Expected timelines for external review

Weeekly must fully cooperate with any external regulatory investigation.

8.5 Record-Keeping Requirements

To comply with CGA expectations:

- All escalated complaints must be logged and stored securely
- Case files must include:
 - All evidence reviewed
 - Communications with the player
 - Reports from game providers or AML systems
 - Internal decision-making notes
- Records must be kept for a minimum of 5 years

Escalated cases must be periodically reviewed to identify:

- Recurring issues
- Policy gaps
- System failures
- Staff training needs

8.6 Player Communication During Escalation

During the escalation process, Weeekly must:

- Communicate in clear and simple language
- Avoid legal jargon unless necessary
- Provide realistic timelines for each review stage
- Keep the player updated at least every 3–5 business days for open cases
- Avoid dismissive or template responses
- Prioritize transparency and fairness at all times

9. External Dispute Resolution (EDR)

If a player is not satisfied with the outcome of Weeekly's internal complaints process, they have the right to escalate the matter to an independent external authority for further review.

Weeekly fully supports the principles of fairness, transparency, and regulatory oversight, and will cooperate with any request from the Curaçao Gaming Authority or its appointed dispute-handling body.

9.1 When a Player May Escalate Externally

A player may file an external complaint when:

- All internal complaint stages have been completed
- A final decision has been issued by Weeekly
- The player still believes the matter has not been resolved fairly or correctly

Only after the internal process is exhausted should players escalate the issue to the regulatory authority.

9.2 Curaçao Gaming Authority (CGA) Dispute Procedure

Players may submit an external complaint directly to the Curaçao Gaming Authority (or its designated dispute resolution body).

Players must include:

- Weeekly complaint reference number
- Full name
- Registered email address
- Details of the dispute
- Evidence or supporting documentation
- Summary of Weeekly's final decision

This ensures the regulator has the full picture and can review the matter objectively.

9.3 How to File a Complaint with the CGA

Weeekly will make the relevant regulatory contact details available to Players, either through the Weeekly platform or upon request.

9.4 Weeekly's Responsibility in External Disputes

Weeekly must fully cooperate with the regulatory authority by providing:

- Gameplay logs
- Transaction history
- Communication records
- Relevant screenshots or internal logs
- Wallet/AML data (where permitted)
- Provider verification reports
- Timeline of actions taken
- Final internal decision document

Weeekly must respond promptly to all regulatory information requests.

9.5 No Retaliation

Weeekly guarantees that:

- Players will never be penalized
- Access will not be restricted
- Accounts will not be downgraded

...solely for escalating a complaint externally.

Escalation is a regulatory right.

9.6 Regulatory Decisions are Final

If the CGA or its designated body issues a determination:

- Weeekly must follow the decision
- Remedies (refunds, adjustments, corrections) must be applied promptly
- Outcomes must be recorded internally and used to improve procedures

Failure to comply is considered a breach of licensing conditions.

10. Fraud, AML or Abuse-Related Complaints

Weeekly is required to balance transparency with players against legal obligations relating to fraud prevention, AML/CFT requirements, and internal risk controls.

This section clarifies how Weeekly handles complaints involving suspected fraud, financial crime, manipulation, or abuse of the platform.

10.1 Nature of AML/Fraud-Related Complaints

These complaints include issues related to:

- Suspicious wallet or transaction activity
- Account freezes or restrictions
- Withdrawal delays due to risk screening
- Multi-accounting or identity mismatch
- Bonus abuse
- Collusion or botting

- Chargebacks or suspected payment fraud
- Accounts under AML review
- Use of mixers, tumblers, or high-risk wallets
- Evasion of geo-blocking or sanctions restrictions

Such cases are subject to special handling due to legal reporting duties.

10.2 Limited Information Disclosure

When a complaint involves AML/CFT concerns:

- Weeekly cannot disclose whether a Suspicious Activity Report (SAR) was filed
- Weeekly cannot reveal the internal risk scoring or AML flags
- Weeekly cannot provide blockchain intelligence details (e.g., mixer detection, wallet risk categories)

This is required under AML laws, which prohibit tipping-off.

The player may be informed only of the operational impact, such as:

- “Your account is under review.”
- “Your withdrawal is temporarily on hold pending compliance checks.”
- “We require additional verification before we can proceed.”

No further detail may be disclosed.

10.3 Handling Withdrawals Under Review

If a complaint is related to withdrawal delays:

Weeekly must verify:

- Wallet address accuracy
- Blockchain transaction history
- AML risk score
- Sanctions screening
- Source of funds (if triggered)
- Multi-signature approval completion
- No ongoing fraud investigation

If a withdrawal is paused due to legal obligations, Weeekly must:

- Inform the player that the review is ongoing
- Request additional documents where needed
- Resume withdrawal processing immediately once cleared

10.4 Account Freezes or Restrictions

In cases of potential fraud or AML risk:

- The account may be frozen temporarily
- Access to deposits/withdrawals may be restricted
- Certain gameplay functions may be disabled

Weeekly must:

- Document the justification
- Follow internal AML escalation procedures
- Review the account within legally reasonable timeframes
- Unfreeze the account once the risk is resolved

10.5 Compliance With Regulatory Duties

Weeekly must comply with:

- AML/CFT regulations
- Mandatory reporting obligations
- Sanctions screening requirements
- Curaçao Gaming Authority expectations

Complaints involving AML/fraud issues are escalated to:

- AML Officer
- Security/Compliance Lead
- Senior Complaints Officer

Players must be informed that some restrictions and delays are lawful and unavoidable.

11. Record Keeping

Weeekly must maintain complete, tamper-proof records of every complaint and all related actions. These records must be accessible for regulatory audits at any time.

11.1 Minimum Retention Period

Weeekly must retain all complaint records for a minimum of 2 years, including:

- Player details
- Full complaint content
- Supporting documents (screenshots, logs, emails)
- All internal investigation notes
- Communications between Weeekly and the player
- Escalation history
- Final decision and rationale
- Any remedial action or refund issued

If the complaint relates to AML or financial matters, retain for 5 years to comply with AML/CFT rules.

11.2 What Must Be Logged

A complete complaint file must include:

1. Player-submitted information

- Name
- Registered email
- Account ID
- Complaint description

- Date/time of reported issue
- Any screenshots or evidence provided

2. System & backend evidence

- Gameplay logs
- RNG results
- Spin/bet histories
- Wallet transactions
- Blockchain confirmations
- Admin action logs
- Fraud or risk alerts

3. Investigation steps taken

- Who investigated
- Systems checked
- Third-party provider responses
- All internal notes and reasoning

4. Communication history

- Acknowledgement email
- All responses to the player
- Requests for additional documents

- Escalation notices

5. Final decision

- Outcome of the complaint
- Whether funds were returned or adjustments made
- Explanation provided to the player
- Date closed

6. Escalation or EDR activity

- Any review by the Senior Complaints Officer
- Whether the player escalated externally
- CGA follow-up (if any)

11.3 Auditability & Storage

To ensure compliance:

- Records must be stored in secure, access-controlled systems
- Logs must be tamper-proof and encrypted
- Access is limited to the Complaints Team, Compliance Officer, ISO, and senior management
- All complaint files must be exportable for CGA audits

Weeekly must ensure complete transparency during regulator reviews.

11.4 Reporting Requirements

If a complaint reveals:

- Game malfunction
- System error
- Major fairness issue
- Security breach
- Financial or AML red flags

It must be immediately escalated internally, and if needed:

- Reported to the Curaçao Gaming Authority
- Addressed with third-party providers
- Documented fully in the complaints log

11.5 Continuous Improvement

Weeekly must regularly analyse complaint patterns to:

- Identify recurring issues
- Improve platform performance
- Update T&Cs, policies, and procedures
- Strengthen AML controls
- Detect provider-level issues
- Improve customer service

The Complaints Officer must deliver quarterly reports summarising:

- Complaint types
- Resolution times
- Common causes
- Systemic issues
- Recommended improvements

12. Confidentiality & Data Protection

Weeekly is committed to ensuring that all player complaints are handled with strict confidentiality and in accordance with our Data Protection & Retention Policy, AML Policies, and Information Security Policy.

12.1 Confidential Handling of Complaints

- All complaint details, including player personal information, account data, and supporting documentation, are treated as confidential.
- Information related to a complaint will only be accessed by:
 - Authorized staff
 - Assigned investigators
 - Complaints Officer
 - AML/Compliance team (when relevant)
 - Senior Management (in escalated cases)
 - Regulators (CGA), when required

12.2 Restrictions on Information Sharing

- No complaint information will be disclosed to:
 - Other players
 - Unrelated third parties
 - External individuals without a legal basis
- Third-party sharing will occur only when necessary for objective verification of gameplay outcomes.

12.3 PII Handling Requirements

All Personal Identifiable Information (PII) submitted through complaints must be handled in line with Weeekly's Information Security Policy:

- Stored securely in encrypted systems
- Access controlled using role-based permissions
- Not exported, downloaded, or shared without justification
- Retained only for required compliance periods
- Never used for marketing or non-compliant purposes

12.4 Secure Communication

- Complaint communications must be sent via secure channels:
 - Encrypted email
 - In-platform support system
 - Approved internal ticketing system
- Screenshots, wallet hashes, IDs, or sensitive documents must not be stored in personal inboxes or unsecure drives.

12.5 Secure Storage & Retention

- Complaint records must be stored in:
 - Secure CRM/support systems
 - Encrypted servers
 - Access-controlled environments
- Retained for a minimum of 2 years
- Longer where required by AML laws

12.6 Compliance With AML & Legal Obligations

- In cases involving suspected fraud, AML flags, or risk indicators:
 - Information may be restricted from the player
 - AML rules take precedence over complaint disclosure
 - Sensitive regulatory documents will not be shared externally

This ensures compliance while protecting operational integrity and player data.

13. Staff Responsibilities

To ensure fairness, efficiency, and impartiality, Weeekly assigns each complaint to the correct team with clear separation of duties.

13.1 Support Team — Initial Intake

The Support Team is responsible for:

- Receiving complaints via email, in-platform form, or portal

- Logging complaints into the internal ticketing system
- Assigning a unique complaint ID
- Confirming receipt to the player
- Gathering initial information if required
- Categorizing the complaint type
- Forwarding the case to the appropriate department

Support may NOT:

- Issue final decisions
- Handle disputes involving AML, fraud, or high-risk financial actions
- Modify account balances without authorization

13.2 Complaints Officer — Core Investigation

The Complaints Officer is responsible for:

- Leading the formal investigation
- Reviewing account data, logs, history, and communications
- Liaising with technical teams or game providers
- Applying Weeekly's T&Cs and policies
- Issuing a reasoned, documented decision
- Ensuring neutrality and fairness
- Maintaining written audit trails
- Contacting the player if more information is required

This officer must remain independent from Support, Marketing, and Promotions.

13.3 AML/Compliance Team — Financial & Fraud-Related Complaints

The AML/Compliance Team handles:

- Withdrawal disputes
- Suspicious activity reports
- Transaction delays involving risk flags
- Mixer exposure, sanctions hits, or high-risk wallets
- Multi-accounting or collusion investigations
- Any case where compliance obligations override the standard complaint flow

They also determine when:

- Additional KYC/EDD is required
- Account restrictions may remain in place
- Information cannot legally be disclosed to the player

Compliance decisions must be documented with regulatory reasoning.

13.4 Technical Team — Game, System & RNG Related Complaints

The Technical Team is responsible for:

- Reviewing game session logs
- Checking RNG seeds/results
- Verifying whether gameplay was affected by:
 - Lag

- System errors
 - Misconfiguration
 - API failures from game providers
- Checking backend logs for:
 - Bugs
 - Malfunctions
 - Unexpected system behaviours
- Confirming whether the system operated normally
- Supporting the Complaints Officer with technical evidence

They do not communicate directly with the player.

13.5 Finance Team — Wallet & Transaction Verification

The Finance Team is responsible for:

- Confirming wallet addresses
- Checking on-chain confirmations
- Verifying payment processor logs
- Reviewing multi-sig approvals
- Ensuring no duplicate transactions occurred
- Assisting AML in high-risk cases

Finance cannot override AML decisions.

13.6 Senior Management — Escalated Disputes

When a player contests the initial decision:

- The Senior Complaints Officer must review the entire case file
- A second, independent staff member must validate findings
- Final internal decision issued by Senior Management
- The player must be notified clearly of the outcome and external escalation options

This ensures fairness and removes bias or single-person decision-making.

13.7 Segregation of Duties

Weeekly enforces the separation of responsibilities between:

- Support
- Complaints Investigation
- Technical
- Finance
- AML/Compliance
- Senior Management

This prevents conflicts of interest and ensures impartial, transparent resolution.

13.8 Training Requirements

Staff handling complaints must receive:

- Customer service training
- Data protection training

- AML/Compliance training (where applicable)
- Game outcome verification training
- Responsible gambling awareness
- Annual refreshers

Only trained staff may handle complaint investigations.

14. Complaints Involving Third-Party Game Providers

Certain complaints may involve outcomes, technical issues, or gameplay irregularities relating to games supplied by external providers. Weeekly must follow a documented, transparent process to ensure fair resolution.

14.1 Third-Party Verification Requirement

If a complaint relates to:

- Game outcomes
- RTP or RNG irregularities
- Game malfunction
- Session disconnections or bet settlement errors
- Any issue beyond Weeekly's direct control

Then Weeekly must request a full game-session verification from the relevant supplier.

14.2 Requesting Logs from Game Providers

Weeekly will:

- Submit a formal request to the provider

- Request session logs, RNG seeds/hashes, timestamped actions, and payout validation
- Ensure all provider logs match Weeekly's logs (bet ID, spin ID, wallet balance movements, timestamps)

14.3 Applying Provider Audit & Fairness Rules

Game suppliers maintain strict fairness and system-integrity standards. Weeekly will:

- Apply the provider's own audit methodology when assessing outcomes
- Rely on certified RNG results where applicable
- Use the supplier's findings as authoritative unless contradictory evidence exists

14.4 Resolution Based on Technical Findings

If provider logs confirm:

- A malfunction → refund wagers, restore balances, or re-credit fair outcome
- No malfunction → communicate findings transparently to the player
- Disconnection or network error → follow provider rules for automatic settlement

14.5 Timeline for Third-Party Complaints

Because third-party providers may take time to respond:

- Weeekly must keep the player updated
- Explain the delay clearly
- Provide an estimated timeframe for provider response
- Issue outcome once all evidence is received

14.6 Ensuring Transparency & Impartiality

Weeekly must ensure that:

- All provider-generated logs remain intact, unaltered, and securely stored
- Supplier audit findings are received and applied without modification
- Game outcomes are evaluated strictly against the certified logic issued by the provider
- The supplier's final determination is communicated to the player in clear, neutral language

Weeekly must not attempt to modify, interpret, or override any technical findings issued by the supplier, and all communications must remain impartial and respectful.

15. Communication with the Player

Weeekly is committed to transparent, fair, and clear communication throughout the entire complaints process. All communication must be easy to understand, free from jargon, and respectful.

15.1 Clear & Understandable Messaging

All responses must:

- Be written in plain language
- Avoid technical jargon
- Avoid defensive, evasive, or vague wording
- Be empathetic and professional

15.2 Transparency of Findings

Responses to complaints must include:

- What was reviewed (game logs, wallet transactions, RNG, admin logs)
- A clear summary of the findings
- Any relevant provider audit results (if applicable)
- Explanation of whether a malfunction occurred or not
- The rationale behind any reimbursement or denial

15.3 Communicating Player Rights

All final responses must inform the player that they may:

- Request further clarification
- Ask for a senior complaints review (internal escalation)
- Escalate the matter to the Curaçao Gaming Authority if unsatisfied

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15.4 No Misleading Statements

Weeekly must never:

- Misrepresent provider findings
- Dismiss complaints without investigation
- Use language implying decisions cannot be reviewed
- Suggest outcomes dictated by “luck” without evidence

15.5 Communication Channels

Responses may be delivered via:

- Email (support@weeekly.com)

- In-platform support systems

All communications must be timestamped and recorded.

15.6 Timely Communication

- Acknowledgement within 24 hours
- Initial investigation response within 48 hours
- Updates provided if delays occur
- Final decision within 7–14 days

15.7 Respectful & Professional Tone

Staff must:

- Treat all players with respect
- Avoid accusatory language
- Avoid assumptions of wrongdoing unless evidence is confirmed
- Maintain neutrality when investigating disputes or allegations

15.8 Confidentiality

All correspondence must:

- Follow Weeekly's Data Protection Policy
- Avoid exposing internal system details
- Mask internal mechanisms that would compromise platform security

15.9 Documentation & Logging

All communication must be stored securely:

- In the complaints system
- Linked to the complaint ID
- Accessible for audit or CGA review

16. Abuse of Complaint Process

Weeekly is committed to offering all players a fair and accessible complaint resolution process. However, the platform must also protect staff, resources, and system integrity from misuse of the complaints procedure.

This section defines how Weeekly will identify and manage abusive, dishonest, or bad-faith complaint behaviours.

16.1 Types of Abuse

The following behaviours are considered abuse of the complaints process:

16.1.1 Malicious or Bad-Faith Complaints

- Intentionally false claims
- Attempts to exploit refund processes
- Submitting fabricated documents or screenshots
- Claims designed to manipulate game outcomes

16.1.2 Abusive or Threatening Behaviour

- Use of offensive, derogatory, or threatening language
- Harassment of support or compliance staff
- Repeated aggressive demands outside the formal process

16.1.3 Excessive or Repetitive Complaints

- Filing multiple identical complaints after a resolution has been provided
- “Complaint spamming” with the intention to overwhelm support
- Filing repeated complaints to try to influence decisions

16.1.4 Fraudulent Submissions

- Altered blockchain transaction IDs
- Fake identity documents
- Photoshopped game logs
- Impersonating another player
- Coordinated multi-account submission of complaints

16.2 Handling Abusive Complaints

If Weeekly determines that a complaint is abusive, dishonest, or intentionally misleading:

1. The complaint may be denied
2. The account may be temporarily suspended
3. Further investigation may be initiated (especially in cases of fraud or AML concerns)
4. All evidence will be documented
5. Player will be informed of the reason for denial (except where restricted by AML/CFT law)

Weeekly must ensure the decision is fair, evidence-based, and properly recorded.

16.3 Protection of Staff & Integrity of the Process

- Staff must not engage with abusive communication beyond required professional responses
- Threats or hostility may lead to restricted communication channels
- Complaints Officers may escalate abusive cases internally
- Technical or AML teams must be notified if evidence suggests fraud

16.4 Right to Restrict Service

Weeekly reserves the right to:

- Restrict access to customer support
- Block repeated abusive submissions
- Suspend or close accounts involved in fraudulent activity
- Refuse to process malicious disputes

This must be handled proportionally and documented in the complaint's audit trail.

17. Policy Review

Weeekly's Player Complaints Policy must remain accurate, relevant, and aligned with regulatory and operational requirements.

This section defines how the policy will be maintained and updated.

17.1 Annual Review

The policy must undergo a formal review at least once every 12 months, conducted by:

- The Complaints Officer
- The Head of Customer Support
- The Compliance/AML Officer
- Senior Management
- Legal (if applicable)

The review ensures the policy remains:

- Clear
- Effective
- Current with industry best practices
- Aligned with evolving CGA requirements

Updates must be approved by Senior Management.

17.2 Post-Incident or Trigger-Based Review

The policy must be reviewed immediately if:

- A major complaint escalates to an external dispute resolution body
- A regulator requests changes
- A system failure affects outcomes or fairness

- A new product (e.g., new game type, Rivals feature, wallet integration) is introduced
- Significant changes to AML/KYC requirements are implemented
- New fraud patterns or complaint trends are identified

These reviews ensure Weeekly adapts rapidly to operational risks and regulatory expectations.

17.3 Documentation Control & Versioning

Weeekly will maintain:

- A version history for all updates
- Change logs summarizing modifications
- Archived versions for audit and regulatory review
- Clear publication of the latest policy to players

All updates must follow the internal documentation governance process.

17.4 Communication of Updates

When the Complaints Policy is updated:

- Staff must be informed
- Training provided if processes change
- Public-facing policy on the website must be replaced with the most recent version

- Customer Support and Compliance teams must adopt the new standards immediately

This ensures consistent application of the policy.