

# Player Complaints Policy

Seven Days B.V.

*Applicable to: Weeekly | Weeekly Rivals | Casino*

*Prepared in alignment with:*

National Ordinance on Games of Chance (LOK), 20 December 2024

CGA Player Complaints Policy Guidelines

**Version 1.0**

Effective Date: [ON LICENCE GRANT]

Issued by: Seven Days B.V.

Curacao Gaming Authority Licence No. [LICENCE NUMBER]

# 1. Purpose & Scope

## 1.1 Purpose

This Player Complaints Policy sets out the framework through which Weeekly receives, investigates, and resolves complaints submitted by players in relation to any aspect of the platform's services.

The policy is established in compliance with the National Ordinance on Games of Chance (Landsverordening op de kansspelen, "LOK") and the Curaçao Gaming Authority (CGA) Player Complaints Policy Guidelines. Adherence to this policy is a condition of Weeekly's Gaming Licence, and non-compliance may be addressed by the CGA in accordance with its supervision, monitoring and enforcement procedures.

This policy applies to all Weeekly players from the date of issuance of Weeekly's Gaming Licence.

- *This complaints Policy is based on regulatory requirements under the LOK. It does not affect or override the applicable rules of private law, including the provisions of Book 6 of the Civil Code of Curaçao concerning general terms and conditions. Weeekly remains responsible for ensuring compliance with all relevant civil law obligations independently of this policy.*

The objectives of this policy are to:

- Provide a clear, accessible, and free-of-charge complaints process for all players.
- Ensure all complaints are treated with impartiality, professionalism, and confidentiality.
- Resolve complaints quickly and effectively, with documented outcomes.
- Comply fully with CGA requirements and the LOK.
- Use player feedback to drive ongoing platform improvements.

## 1.2 Scope

This policy applies to all Weeekly platforms, brands, and wagering products, including:

- Weeekly - weekly raffle draws, ticket purchases, Weeekly Coins wagering, prize allocation and draw results.
- Weeekly Rivals - competitive wagering, leaderboards, an identical starting coin balance for all entrants, prize allocation based on leaderboard position.
- Weeekly Casino - real-money casino gameplay across both in-house and third-party game content, deposits and withdrawals, and game outcomes from either source.
- Associated services - account registration and verification, KYC/AML controls, responsible gaming tools, platform incident handling, and prize distribution.

This policy also covers any games or services operated by Weeekly directly, including proprietary in-house games available within Weeekly, Weeekly Rivals, and Weeekly Casino, as well as games or services provided by licensed third-party game providers, platform aggregators, or external suppliers operating within the Weeekly environment.

## 1.3 Who This Policy Applies To

This policy applies to:

### Players

Any registered player who wishes to lodge a complaint regarding account management, deposits or withdrawals, game fairness or results, raffle or competition entry issues, technical or service problems, alleged breaches of Terms & Conditions, responsible gaming concerns, or fraud or suspicious activity.

- *Complaints may only be submitted by the registered player. Players are not permitted to sell, donate, assign, or otherwise transfer any claim against a Gaming Licence holder to a third party.*

## **Staff**

All Weeekly personnel involved in customer support, compliance and AML, technical operations, payment and verification, or management of escalated cases. All staff handling complaints must follow the procedures in this policy, document all actions and findings, maintain professional and unbiased conduct, and protect player data privacy.

### **1.4 Complaint Channels**

Weeekly accepts complaints submitted through the following official channels only:

- Email: support@weeekly.com
- In-platform contact form at weeekly.com
- Regulatory referrals via the Curaçao Gaming Authority

Only complaints submitted through official channels will be processed formally. Complaints submitted via social media, third-party forums, or unofficial addresses will not be treated as formal complaints, though players will be directed to the correct channel.

### **1.5 Regulatory Alignment**

This policy aligns with:

- the LOK (National Ordinance on Games of Chance);
- the CGA Player Complaints Policy Guidelines (June 2025);
- the GCB AML/CFT Regulations (where complaints overlap with financial crime obligations);
- Weeekly's Terms & Conditions, Responsible Gaming Policy, and KYC/AML Policy;
- applicable data protection law.

### **1.6 Publication & Acceptance**

In accordance with the CGA Player Complaints Policy Guidelines, Weeekly:

- Includes this Complaints Policy, and references all stages of complaint resolution, in its Terms & Conditions.
- Publishes this Complaints Policy as a standalone document accessible from the Weeekly website homepage and registration page.
- Requires players to confirm acceptance of this Complaints Policy as part of the registration process, by tick-box or equivalent mechanism.

## **2. Definitions**

The following definitions apply throughout this policy.

### **Player Interaction**

Any written communication initiated by a player and directed to Weeekly's customer service team, including general enquiries, feedback, or requests for information or assistance. A player interaction is not, in itself, a Complaint.

**Complaint**

A written expression of dissatisfaction by a registered player relating to Weeekly's services, decisions, terms, or conduct, where the player is unhappy and expects a response or resolution. For reporting purposes, a Complaint is formally recorded when a Complaint Submission Form has been submitted to Weeekly, or when the matter has been escalated to ADR.

**Dispute**

A Complaint that has not been resolved to the player's satisfaction through Weeekly's internal complaints process, and which has been escalated either internally or to an independent third party (e.g. an ADR provider or court of law).

**Responsible Gaming Complaint**

A Complaint that relates to the targeting of Vulnerable Persons, the availability or timely implementation of self-exclusion or cooling-off measures, or the mandated consequences of those measures as outlined in Weeekly's Responsible Gaming Policy. These complaints are subject to accelerated timelines.

**Vulnerable Person**

Any person who is under eighteen years of age; has insufficient control over their gambling behaviour; has been excluded from playing Games of Chance; or has been declared bankrupt or lost control of their assets.

**ADR (Alternative Dispute Resolution)**

An independent, third-party process through which unresolved complaints may be escalated, offered free of charge to the player and at Weeekly's expense.

**Complaint Submission Form**

The standardised form, available in English and any other language used on the Weeekly platform, through which players formally submit complaints. The form must be used to initiate the formal complaints process.

## **3. Complaint Submission Process**

### **3.1 Complaint Window**

Players may lodge a complaint free of charge at any time within six months of the incident or event about which they are complaining.

For Rivals competitions and any fixed-odds or ante-post wagers, the six-month window begins from the date of the event settlement or competition conclusion, not from the date the wager was placed.

Where a complaint relates to in-play or in-running mechanics, players are advised that time-sensitive evidence (such as real-time session data) may not be retained indefinitely. Prompt submission is therefore recommended.

### **3.2 Customer Support (First Instance)**

In the first instance, Weeekly offers customer support via email and in-platform live chat. Players are encouraged to raise any issue through customer support before submitting a formal Complaint, as many matters can be resolved at this stage. A Player Interaction with customer support does not constitute a Complaint for the purposes of this policy or the LOK.

### **3.3 Complaint Submission Form**

An official Complaint Submission Form must be used by the player to formally submit a complaint. The form is available:

- As an online form, fully completable and submittable within the Weeekly platform; and/or
- As a downloadable document (PDF or Word format) that can be completed and emailed to support@weeekly.com.

The form must include, at a minimum:

- The complainant's full name, address, and place of residence.
- The complainant's account username.
- The date of the complaint and the date of the disputed event or incident.
- A description of the conduct, outcome, or decision being disputed - with reference to a predetermined category where applicable (see Section 8).

The form must be available in English and in any other language used on the domain from which the player accessed the platform.

Weeekly may request supporting documentation as part of the complaint. Any such request will be reasonable in the context of investigation and resolution.

### **3.4 Required Information**

To enable accurate and timely handling, players are asked to provide the following when submitting:

- Full name (as registered on the account)
- Registered email address
- Account username
- Description of the issue: what happened, what was expected, and any steps already taken
- Date and time of the incident
- Relevant transaction IDs, game round IDs, draw IDs, or blockchain transaction hashes
- Any supporting documentation: screenshots, receipts, email confirmations, or chat logs

Providing as much detail as possible at the point of submission will help ensure a faster and more accurate resolution.

### **3.5 Free Access & Player Rights**

Submitting a complaint is free of charge. Weeekly will not impose any fees, conditions, or deposit requirements as a precondition to submitting or progressing a complaint. No disadvantage or account restriction will be imposed on any player solely because they have filed a complaint.

Except where mutually agreed under specific terms of ADR (see Section 8), Weeekly will not restrict the right of the player to take independent legal action.

Complaints may be submitted in any one of the official languages of Curaçao - English, Dutch, or Papiamentu. The Complaint Submission Form is available in English and in the language of the website or domain through which the player accesses the Weeekly platform.

## **4. Acknowledgement**

Within one week of receiving a formal complaint via the Complaint Submission Form, Weeekly will send the player a written acknowledgement.

The acknowledgement will include:

- Confirmation that the complaint has been received.
- A unique complaint reference number (ticket ID) for tracking.
- A summary of the complaint as submitted.
- An explanation of how the complaint will be processed.
- The expected investigation timeline (including the applicable track: Responsible Gaming or Standard).
- Any additional information the player may be required to provide.
- Instructions not to submit duplicate complaints across multiple channels.
- Contact information for follow-up.

The acknowledgement does not constitute a resolution; it confirms receipt and initiates the formal process.

### **4.1 Complaint Reference**

Each complaint will be assigned a unique reference number upon acknowledgement. This reference must be used for all internal tracking, escalation, regulatory reporting, and player communications throughout the life of the complaint.

## **5. Response & Resolution Timelines**

Weeekly operates two complaint tracks with separate timelines, as required by the CGA Guidelines.

### **5.1 Responsible Gaming Complaints**

Complaints related to responsible gaming are prioritised due to the potential impact on player well-being. A complaint will be categorised as a Responsible Gaming Complaint where it concerns the targeting of Vulnerable Persons, the availability or timely implementation of self-exclusion or cooling-off measures, or the mandated consequences of those measures as set out in Weeekly's Responsible Gaming Policy.

Within two days of receiving the complaint, Weeekly will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

Weeekly will use best efforts to resolve Responsible Gaming Complaints within five business days. Where more time is required to make a reasonable and informed decision, the player will be informed of the delay, which cannot exceed two weeks. Where any delay is attributable to a slow or absent response from the player, the resolution period may be extended by no more than a further two weeks.

All communications with the player in relation to a Responsible Gaming Complaint must be conducted by a human member of staff, not by AI.

## **5.2 All Other Complaints**

Following acknowledgement under Section 4, Weeekly will assess and respond to all other complaints within four weeks of receipt. Where necessary due to complexity or the need for additional information, this period may be extended once by an additional four weeks, with prior written notice to the player.

## **5.3 Final Determination**

A player will always receive a final determination of their complaint in writing. The response will be one of the following:

- A reasoned final assessment of the outcome or resolution of the complaint, with supporting evidence where applicable.
- Detailed reasons for not handling the complaint. Where additional information is reasonably required to address the complaint fully, Weeekly must have requested that information within the initial four-week period. Should the complainant not provide the necessary information within that period, Weeekly may reject the complaint.
- If the player is unsatisfied with the resolution and indicates so, the player will be informed that they may escalate the matter to an independent ADR entity.

## **5.4 Use of Artificial Intelligence**

AI may be used to assist with the handling of complaints, subject to the following:

- AI must not be used for any communications with a player once a complaint has been identified as relating to Responsible Gaming.
- AI must not handle complaints that are complex in nature.
- AI outputs must be monitored to ensure consistency and fairness across like-for-like complaints.

# **6. Investigation Process**

All complaints are subject to a fair, thorough, and evidence-based investigation. All decisions must be based on verifiable logs and technical evidence, aligned with Weeekly's Terms & Conditions, and approved by a senior member of the relevant team.

## **6.1 Initial Review**

Upon receipt, the Support Team will: validate the player's identity; confirm the complaint details; assign the unique reference number; categorise the complaint type; and allocate the case to the appropriate investigator or specialist. If the submission is incomplete, Weeekly will contact the player to request the missing information before the formal investigation begins.

## **6.2 Investigation Components**

### **Account History Review**

Login history, IP and device consistency, recent gameplay or wagering activity, account status and any existing restrictions, bonus usage and wagering progress.

### **Gameplay Log Analysis**

Depending on the product: ticket allocation logs, draw randomisation logs, RNG outcome references and seed verification, Rivals wagering logs and leaderboard score calculations, anti-cheat and anomaly detection flags, round-by-round game logs, session reconstructions.

### **System & Backend Verification**

Admin panel logs, player balance adjustments, manual interventions, account status changes, withdrawal approval records, prize pool changes, relevant security/SIEM logs.

### **Financial & Blockchain Checks**

Blockchain transaction IDs, wallet-to-wallet transfer confirmation, AML/sanctions/mixer screening results, internal ledger entries, custody provider logs, withdrawal queue and settlement timestamps.

### **In-House Game Verification**

Where a complaint relates to an in-house game outcome subject to Weeekly's provably fair scheme - including the proprietary games available across Weeekly, Rivals, and Casino - the player may independently verify the outcome using the public per-game verifier, which reproduces the round from the server seed, client seed, and nonce associated with the bet. Weeekly's investigation in such cases will confirm: (i) the cryptographic commitment of the server seed was valid and timestamped before the bet was placed; (ii) the revealed server seed matches the committed hash; and (iii) the verifier output matches the recorded outcome. For game outcomes not covered by the provably fair scheme - including Weeekly raffle draws, Rivals leaderboard determination, and any third-party Casino game content - Weeekly will examine internal session logs, RNG seeds and hashes, audit trails, and certification records of the underlying RNG, or third-party provider records for aggregator content. Findings from these records are incorporated into the investigation and may form the basis of the final determination. This step is mandatory for all disputes involving in-house game results or functionality.

### **Third-Party Provider Verification**

Where a complaint relates to a third-party game outcome, Weeekly will request official session logs, RNG seeds/hashes, and audit data from the relevant licensed provider. Provider findings are incorporated into the investigation and may form the basis of the final determination. This step is mandatory for all disputes involving third-party game results or functionality.

### **Terms & Conditions Compliance**

Confirmation of whether the player followed applicable rules; whether wagering requirements were met; whether any prohibited conduct occurred; and whether promotional terms affect the outcome.

## **6.3 Evidence-Based Decision**

Decisions must not rely on assumptions or subjective judgement. Where a complaint is upheld, corrective action (refund, prize correction, bonus reinstatement, or other remedy) must be taken promptly.

## **6.4 Recordkeeping**

A complete investigation file must be maintained for each complaint, including all complaint details, player communications, logs and evidence reviewed, third-party responses, the final resolution, investigator notes, and timestamps for each step. See Section 11 for retention periods.

# **7. Escalation Process**

If a player is not satisfied with the initial resolution, Weeekly provides a structured internal escalation process before external options are engaged.

## **Stage 1 - Internal Escalation**

The complaint is escalated to a Senior Complaints Officer who was not involved in the original response. That officer must independently review all materials, re-check logs and correspondence, verify that policies were correctly applied, and issue a new written decision.

## **Stage 2 - Independent Second Review**

A second staff member, unconnected to both the original case and Stage 1, must verify the decision before it is issued. This reviewer may be from the Compliance, Risk, or Quality Assurance team, depending on the nature of the complaint. This step ensures no conflict of interest and provides independent validation.

## **Stage 3 - Final Internal Decision**

Weeekly will issue a final written internal decision clearly setting out the findings, referencing applicable Terms & Conditions or policies, stating whether any compensation, refund, or reversal is due, and providing a closing summary. This closes Weeekly's internal review process.

## **7.1 Player Communication During Escalation**

Throughout escalation, Weeekly will communicate in clear and simple language, provide realistic timelines, update the player at least every three to five business days for open cases, and avoid dismissive or templated responses.

# **8. Alternative Dispute Resolution (ADR)**

Weeekly is required to always offer its players access to independent ADR services. ADR is offered free of charge to the player; all costs of the ADR process are borne by Weeekly.

## 8.1 When ADR Is Available

A player may escalate to ADR when:

- All stages of Weeekly's internal complaints process have been completed.
- A final written decision has been issued by Weeekly.
- The player remains unsatisfied with that outcome.
- *ADR should only be pursued after the internal process is exhausted. Weeekly will inform the player of the ADR option in every final decision letter.*

## 8.2 ADR Provider

Weeekly's designated Alternative Dispute Resolution provider is CADRE B.V. (the Curaçao Alternative Dispute Resolution Entity), an independent entity certified by the Curaçao Gaming Authority under certification number CGA/ADR/2025/01.

Players may submit a dispute to CADRE via the claims form available on CADRE's official website. The dispute resolution process is free of charge to the player; all associated costs are borne by Weeekly. CADRE's decision is binding on Weeekly. The ADR process is expected to be completed within 90 days of the initial referral. Full contact details, the submission form, and CADRE's Rules of Procedure are published on CADRE's official website, to which Weeekly will provide a direct link from this policy, the Terms & Conditions, and the Help Centre prior to launch. Players are advised to review CADRE's Rules of Procedure before submitting a claim.

Status: Weeekly's engagement with CADRE B.V. is in progress. The subscription agreement, exact URL, and player-facing submission link will be finalised and published prior to platform launch. The executed engagement agreement will be uploaded to the CGA Portal in accordance with the CGA Player Complaints Policy Guidelines (Clause 5.2).

## 8.3 ADR Process Rules

- Once an ADR process has been completed, it cannot be recommenced by either the player or Weeekly with a different ADR entity.
- If the player withdraws from an ADR process after it has begun, the matter cannot be re-surfaced at a later date.
- Weeekly will not restrict a player's right to take independent legal action, except where mutually agreed under specific ADR terms.
- Weeekly must fully cooperate with any ADR provider, supplying gameplay logs, transaction records, communications, and all other relevant evidence promptly.
- ADR decisions that are binding on Weeekly will be implemented promptly.
- *Where Weeekly sets ADR parameters intended to prevent abuse - such as whether ADR must be undertaken before a player initiates legal proceedings, the binding nature of the ADR outcome on the player, or any minimum claim value required for escalation to ADR - such parameters will be set with the benefit of independent legal advice. The CGA assesses each case on its merits; matters involving the admission of self-excluded persons will be taken seriously regardless of monetary value.*

## 8.4 Role of the CGA

Players should be aware that:

- The CGA does not resolve or make decisions on individual player complaints regarding gambling-related transactions.
- Decisions made by Weeekly or an ADR provider are not subject to review or reversal by the CGA unless they are deemed to have been inadequately handled.
- Players retain the right to contact the CGA directly regarding malpractice, breach of licence conditions, or whistleblowing matters, regardless of any internal or ADR outcome.
- While the CGA does not mediate individual disputes, it uses complaint information to support its supervisory and enforcement activities.

## 9. Reasons for Complaint

Players have the right to complain about any aspect of their relationship with Weeekly, or any incident related to their participation in a game of chance. Categories include but are not limited to:

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues (including self-exclusion, cooling-off, and limits)
- Treatment of player balances or winnings
- KYC and verification
- Data protection
- Technical or software issues
- AML concerns
- Issues involving minors
- Alleged fraudulent games or practices
- Licence or regulation concerns
- Unfair terms and conditions

## 10. AML, Fraud, and Integrity Complaints

Weeekly must balance its obligation to respond transparently to players against its legal obligations under AML/CFT legislation. The following rules apply to complaints involving suspected financial crime, fraud, platform integrity, or verification matters.

### 10.1 KYC & Verification Requests

Weeekly is required to apply identity verification and, where applicable, enhanced due diligence to players in accordance with the GCB AML/CFT Regulations and Weeekly's KYC/AML/CFT Policy. Verification is applied in two procedural tiers: Level 1 (standard onboarding identity check) at signup for every player, and Level 2 (enhanced verification, including government-issued photo ID and a biometric/liveness check) when triggered by any of the threshold, suspicion, prize, or first-withdrawal pathways set out in the KYC/AML/CFT Policy. Where elevated risk factors are identified - including PEP status, high-risk jurisdictions, or unusual transaction patterns - enhanced due diligence may be applied, which may include requests for proof of address, source of funds, or source of wealth.

Where a player submits a complaint about a verification request, an account hold pending verification, or a delay caused by AML checks, Weeekly will:

- Acknowledge the complaint within the standard timelines set out in Section 5.
- Confirm what (if anything) is outstanding from the player to progress verification.
- Resume normal account access or transaction processing once verification is completed.

AML and verification obligations are mandatory and cannot be waived through the complaints process. The complaints route does not provide an alternative or expedited path around verification requirements. Full detail of Weeekly's verification framework is set out in the Weeekly KYC/AML/CFT Policy.

## **10.2 Limited Disclosure**

Where a complaint involves AML/CFT concerns, Weeekly cannot disclose:

- Whether an Unusual Transaction Report (UTR) has been filed.
- Internal risk scores or AML flags.
- Blockchain intelligence outputs.

This is required under tipping-off prohibitions in AML legislation. The player may be told only the operational impact, such as "your account is under review" or "your withdrawal is temporarily on hold pending compliance checks".

## **10.3 Fraud & Integrity Allegations**

Complaints where a player alleges cheating, collusion, botting, multi-accounting, leaderboard manipulation, or money laundering must receive immediate priority escalation to the AML/Compliance Officer and Security team. These cases are documented at the highest level and are not subject to standard timelines where doing so would compromise an ongoing investigation.

# **11. Record-Keeping & Reporting**

## **11.1 Retention**

Weeekly will retain complete complaint records for the following minimum periods:

- General complaints: five years.
- Complaints involving AML, fraud, or financial matters: five years (aligned with AML/CFT obligations).
- Unresolved complaints and those escalated to ADR or legal proceedings: five years, or the lesser period stipulated by applicable data protection legislation, statute of limitations, or other relevant rules.

## **11.2 What Is Logged**

Each complaint file must include: player details and submission information; gameplay, system, and blockchain logs; investigation steps and third-party provider responses; all communications with the player; the final decision and outcome; escalation and ADR activity (if any); and any remedial action taken.

## **11.3 Regulatory Reporting**

Weeekly will submit complaint reports to the CGA on 15 January and 15 June each year, covering complaints submitted via the Complaint Submission Form since the previous reporting period.

Each report will summarise:

- Total number of complaints made.
- Total number of settled complaints (upheld and rejected).
- Number of pending or unresolved complaints.
- Number of complaints by category.
- Number referred to ADR.
- Number and detail of complaints for which the player has taken legal action.

Weeekly will also ensure transparency and compliance with ADR decisions and any regulatory updates issued by the CGA. ADR service providers are subject to their own reporting requirements under the CGA's Alternative Dispute Resolution policy.

The CGA reserves the right to request, at any time, access to records of complaints received as well as any disputes pending resolution.

## **11.4 Continuous Improvement**

Weeekly will analyse complaint patterns on a quarterly basis to identify recurring issues, policy gaps, system failures, and staff training needs. The Complaints Officer will produce quarterly summary reports for Senior Management.

## **12. Confidentiality & Data Protection**

All complaint details, including personal information, account data, and supporting documentation, are treated as strictly confidential. Information relating to a complaint will only be accessed by authorised staff, assigned investigators, the Complaints Officer, the AML/Compliance team (where relevant), Senior Management in escalated cases, and regulators (CGA) where required by law.

No complaint information will be disclosed to other players, unrelated third parties, or external individuals without a legal basis. Third-party sharing occurs only where necessary for objective verification of gameplay outcomes.

All personal data submitted in connection with a complaint will be handled in line with Weeekly's Privacy Policy and Data Protection & Retention Policy: stored securely in encrypted, access-controlled systems; retained only for required compliance periods; and never used for marketing or other unauthorised purposes.

## **13. Terms & Conditions**

The Complaints procedure is visible and accessible on the Weeekly website as a standalone link or document, and is also clearly outlined in the Terms & Conditions. The information provided includes, at a minimum:

- Links to customer service and information on how to contact Weeekly.
- Detail of the information required for a player to make a complaint, with links to either or both the online Complaint Submission Form and a downloadable PDF/Word version.
- Timelines for acknowledgement, response, and resolution (including the separate Responsible Gaming track).
- Player rights to complain, including explicit rights to ADR services and regulatory escalation.
- An explanation of the potential consequences of the relevant ADR entity's decision and the way this affects the player's right to further legal and judicial recourse.

- Details of the ADR process and player rights within it.
- Contact information for the ADR provider.
- A clear statement that the CGA does not mediate in individual disputes, but that players may contact the CGA where they believe Weeekly is in breach of its regulatory obligations.

## 14. Staff Responsibilities & Segregation of Duties

Weeekly enforces clear separation of responsibilities across: Support (initial intake and acknowledgement); Complaints Investigation (core investigation and first-instance decision); Technical (RNG, game session, and system verification); Finance (wallet, transaction, and multi-sig verification); AML/Compliance (financial crime, fraud, and regulated restrictions); and Senior Management (escalated decisions and final internal determinations).

This segregation prevents conflicts of interest and ensures impartial, transparent resolution. Staff handling complaints must receive customer service training, data protection training, AML/compliance training (where applicable), game outcome verification training, and responsible gambling awareness training, with annual refreshers.

## 15. Abuse of the Complaints Process

Weeekly reserves the right to identify and manage abusive, dishonest, or bad-faith complaint behaviour, including:

- Intentionally false claims or fabricated documentation.
- Abusive, threatening, or harassing conduct directed at staff.
- Repeated identical complaints following a final determination.
- Fraudulent submissions, impersonation, or coordinated multi-account complaint campaigns.

Where Weeekly determines a complaint is abusive or dishonest, the complaint may be rejected, access to customer support may be restricted, and further investigation (including AML escalation) may be initiated. Any such decision will be evidence-based, proportionate, and recorded in the complaint's audit trail. Players will be informed of the reason for rejection except where restricted by AML/CFT law.

## 16. Policy Review

This policy will be reviewed at least annually by the Complaints Officer, Head of Customer Support, Compliance/AML Officer, and Senior Management, with legal input as applicable. It will also be reviewed immediately following: any major complaint escalation to external dispute resolution; a regulatory request for changes; a system failure affecting fairness; the introduction of a new product or feature; significant changes to AML/KYC requirements; or the identification of new fraud patterns or complaint trends.

All updates will be approved by Senior Management, documented in a version history, and communicated to staff and players. The live version will always be publicly accessible on the Weeekly website.

This document is subject to Curaçao law. Disputes arising from its application will be resolved before the Curaçao courts.