



CANARY ALLEY B.V.

COMPLAINTS HANDLING AND DISPUTE
RESOLUTION POLICY

Version:

Approved By:

Review Frequency:

Effective Date:

2.0

Board of Directors

Annual or upon material regulatory change

09/06/2026

Previous Version	Current Version	Edit Date	Changes	Editor	Signature
---	1.0	10/07/2025	First Version	MO	
1.0	2.0	09/06/2026	Second version – ADR updates and rewritten to comply with Alternative Dispute Resolution (ADR) Role and Certification Version 1.0 8th September 2025, Player Complaints Policy Guidelines Version 1.1 18 June 2025, Policy Guideline Terms and Conditions Version 1.0 April 2026	MO	Signed by:  8737E2B30CF043F... Director: Signed by:  F9C1A4A3E74E4ED Director:



1. PURPOSE

The purpose of this Complaints Handling and Dispute Resolution Policy (“Policy”) is to establish the framework through which Canary Alley B.V. (“Company”) receives, investigates, resolves, records and reports player complaints and disputes.

This Policy is designed to ensure compliance with:

- National Ordinance on Games of Chance (LOK), including Article 5.3 and related provisions;
- Applicable licence conditions issued by the Curaçao Gaming Authority (“CGA”);
- CGA Player Complaints Policy Guidelines;
- CGA Alternative Dispute Resolution Guidelines;
- CGA Terms and Conditions Guidelines;
- Applicable Curaçao laws and regulations.

The Company recognises that effective complaint handling is a critical component of responsible gambling, customer protection, regulatory compliance and operational integrity.

The Company shall ensure that all complaints are handled fairly, consistently, objectively, transparently and without undue delay.

2. SCOPE

This Policy applies to:

- All gaming products offered by Canary Alley B.V.;
- All websites and domains operated under the Company’s Curaçao licence;
- All player complaints and disputes;
- All employees, contractors and third-party service providers involved in player interactions;
- All stages of complaint escalation including Alternative Dispute Resolution (“ADR”).

This Policy does not apply to:

- Employment grievances;
- Supplier disputes;
- Shareholder disputes;
- Corporate legal claims unrelated to player gaming services.



3. REGULATORY PRINCIPLES

The Company shall ensure that:

3.1 Accessibility

Players can submit complaints free of charge.

3.2 Fairness

Complaints are investigated impartially.

3.3 Transparency

Players are informed of:

- Complaint procedures;
- Complaint timelines;
- Escalation rights;
- ADR rights.

3.4 Accountability

Complaint outcomes shall be documented and capable of regulatory review.

3.5 Responsible Gambling Protection

Responsible Gambling complaints shall receive priority treatment.

3.6 Continuous Improvement

Complaint trends shall be analysed to identify:

- Operational weaknesses;
 - Product deficiencies;
 - Compliance risks;
 - Responsible Gambling concerns.
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4. DEFINITIONS

4.1 Complaint

A written expression of dissatisfaction by a player relating to the Company's services, conduct, decisions, products, promotions, account actions or terms and conditions where the player expects a response or resolution.

4.2 Dispute

A Complaint that has not been resolved to the player's satisfaction through the Company's internal complaints process and is escalated to ADR.

4.3 Responsible Gambling Complaint

A Complaint relating to:

- Self-exclusion;
- Cooling-off periods;
- Vulnerable player protections;
- Responsible Gambling interventions;
- Problem gambling controls;
- Marketing directed at vulnerable players.

4.4 Complainant

The registered player submitting a Complaint.

4.5 ADR

Alternative Dispute Resolution conducted by a CGA-certified provider.

4.6 ADR Provider

EGIS ADR or any other CGA-certified provider approved by the Company.

4.7 Vulnerable Person

As defined under the LOK and related regulations.



5. ROLES AND RESPONSIBILITIES

5.1 Board of Directors

The Board shall:

- Approve this Policy;
 - Review material complaint trends;
 - Ensure adequate complaint handling resources;
 - Receive escalation reports relating to significant regulatory risk.
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5.2 Compliance Officer

The Compliance Officer shall be the owner of this Policy.

Responsibilities include:

- Oversight of complaint handling;
 - Monitoring compliance with complaint timelines;
 - Reviewing escalated complaints;
 - Managing ADR interactions;
 - Reporting to the CGA when required;
 - Maintaining complaint records;
 - Conducting root cause analysis.
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5.3 Customer Support Team

Customer Support shall:

- Receive complaints;
 - Record complaints;
 - Acknowledge complaints;
 - Attempt first-line resolution;
 - Escalate complaints when required.
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5.4 Responsible Gambling Team

The Responsible Gambling Team shall:

- Review Responsible Gambling complaints;



- Prioritise vulnerable player concerns;
 - Implement immediate protective actions where necessary;
 - Support investigations.
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5.5 Senior Management

Senior Management shall:

- Support investigations;
 - Implement corrective actions;
 - Address systemic issues identified through complaints.
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6. COMPLAINT ELIGIBILITY

A Complaint may only be submitted by:

- The registered player; or
- A legally authorised representative where permitted by law.

Complaints shall not be accepted from:

- Third parties without authority;
- Affiliates;
- Agents acting without legal authority.

The Company reserves the right to request evidence of authority where representation is claimed.

7. COMPLAINT CATEGORIES

Complaints may include, but are not limited to:

Financial Matters

- Deposits;
- Withdrawals;
- Account balances;
- Payment delays;
- Bonus funds.



Betting Matters

- Settlement disputes;
- Void bets;
- Event grading;
- Market rules.

Technical Matters

- Website outages;
- System errors;
- Platform functionality.

Responsible Gambling Matters

- Self-exclusion failures;
- Cooling-off requests;
- Vulnerable player concerns;
- Marketing complaints.

Compliance Matters

- KYC requirements;
- Source of Funds requests;
- AML reviews;
- Account restrictions.

Customer Service Matters

- Communication quality;
- Delays;
- Conduct of staff.

Privacy Matters

- Data protection;
- Information requests;
- Personal data handling.

Other Matters

Any matter affecting a player's experience or rights under applicable law or Company policy.



8. COMPLAINT SUBMISSION PROCEDURE

8.1 Submission Methods

The Company shall make available a formal Complaint Submission Form through:

- The Company's website;
- The player's account area;
- Customer Support upon request.

Complaints may be submitted by:

Email: contactus@orbitexch.com

or through any complaint submission mechanism made available on the Company's websites.

Customer Support staff receiving complaints through chat, telephone or social media channels shall direct the player to the formal complaint submission process where the matter cannot be immediately resolved.

8.2 Complaint Submission Requirements

A Complaint should contain:

- Full name of the player;
- Registered account username or account number;
- Residential address;
- Email address;
- Date of complaint;
- Date of disputed event;
- Description of the issue;
- Desired outcome;
- Supporting evidence where available.

The Company may request additional information where reasonably necessary to investigate a Complaint.

The Company shall not request unnecessary documentation that may create unreasonable barriers to complaint resolution.



8.3 Complaint Time Limits

Complaints must be submitted within six (6) months of:

- The incident giving rise to the Complaint; or
- Settlement of the relevant wager; or
- Conclusion of the relevant event.

For ante-post betting, poker, exchange betting or other event-based products, the six-month period shall commence from final settlement of the relevant event or market.

The Company may consider complaints submitted outside this period where exceptional circumstances exist.

8.4 Complaint Registration

Upon receipt of a Complaint, the Company shall:

- Allocate a unique complaint reference number;
- Record the Complaint in the Complaint Register;
- Categorise the Complaint;
- Assign ownership for investigation.

The Complaint Register shall be maintained by the Compliance Officer.

9. COMPLAINT HANDLING FRAMEWORK

The Company shall operate a four-stage complaint resolution framework.

Stage 1 – Customer Support Resolution

Customer Support shall attempt to resolve straightforward complaints through direct engagement with the player.

Examples include:

- Account queries;
- Deposit issues;
- Minor technical issues;
- Bonus clarifications;
- Settlement explanations.



Where resolution is achieved, the outcome shall be recorded within the Complaint Register.

Stage 2 – Operational Investigation

Where Customer Support cannot resolve the Complaint, the matter shall be escalated to the relevant operational team.

This may include:

- Trading Team;
- Payments Team;
- Responsible Gambling Team;
- Compliance Team;
- Technical Operations Team.

The assigned investigator shall:

- Review all relevant evidence;
 - Obtain system records;
 - Review communications;
 - Consider applicable rules and policies;
 - Prepare findings.
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Stage 3 – Compliance Review

Complaints involving:

- Significant financial value;
- Responsible Gambling matters;
- Regulatory concerns;
- Potential breaches of law;
- Repeated complaints;
- Reputational risk;

shall be reviewed by the Compliance Officer.

The Compliance Officer may:

- Confirm the proposed resolution;
- Modify the proposed resolution;
- Require further investigation;



- Escalate to Senior Management.
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Stage 4 – ADR Referral

Where a player remains dissatisfied following completion of the internal complaints process, the player shall be informed of the right to refer the matter to ADR.

ADR shall only be available after the Company's internal complaints process has been completed.

10. COMPLAINT ACKNOWLEDGEMENTS

10.1 Responsible Gambling Complaints

Within two (2) calendar days of receipt, the Company shall:

- Acknowledge receipt in writing;
 - Confirm that the Complaint has been categorised as a Responsible Gambling Complaint;
 - Explain the investigation process;
 - Provide estimated resolution timelines.
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10.2 All Other Complaints

Within one (1) week of receipt, the Company shall:

- Acknowledge receipt in writing;
 - Provide the complaint reference number;
 - Explain the complaint handling process;
 - Provide estimated resolution timelines.
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11. INVESTIGATION STANDARDS

All investigations shall be:

- Fair;
- Objective;
- Evidence-based;



- Properly documented;
- Free from conflicts of interest.

Investigators shall review all relevant information including:

- Account history;
- Transaction records;
- Betting activity;
- Trading logs;
- Game logs;
- Internal communications;
- Relevant policies;
- Terms and Conditions;
- Regulatory requirements.

The Company shall maintain sufficient records to demonstrate the basis of any decision reached.

12. RESPONSIBLE GAMBLING COMPLAINTS

Responsible Gambling complaints shall receive priority handling.

Examples include:

- Failure to apply self-exclusion;
- Failure to honour cooling-off periods;
- Marketing sent to self-excluded players;
- Access granted to vulnerable persons;
- Responsible Gambling intervention concerns.

The Company shall use best efforts to resolve Responsible Gambling complaints within five (5) business days.

Where additional time is required:

- The player shall be informed;
- Reasons for delay shall be documented;
- Any extension shall not exceed two (2) weeks unless exceptional circumstances exist.

Where immediate player protection is required, temporary account restrictions may be imposed pending investigation.



13. COMPLAINT DECISIONS

Upon completion of an investigation, the Company shall issue a Final Complaint Decision.

The decision shall include:

- Complaint reference number;
- Summary of the complaint;
- Investigation findings;
- Applicable rules or policies;
- Outcome;
- Corrective action where applicable;
- ADR escalation rights.

The Final Complaint Decision shall be retained within the Complaint Register.

14. POSSIBLE OUTCOMES

A Complaint may be:

- Upheld
The Company agrees that the Complaint is valid.
- Partially Upheld
The Complaint is partially valid.
- Rejected
The Complaint is not supported by available evidence.
- Resolved by Agreement
The parties agree a mutually acceptable outcome.
- Withdrawn
The player withdraws the Complaint.



- Referred to ADR

The Complaint becomes a Dispute and is escalated.

15. ALTERNATIVE DISPUTE RESOLUTION (ADR)

15.1 ADR Provider

Canary Alley B.V. shall provide access to:

EGIS ADR

or any successor ADR provider certified by the Curaçao Gaming Authority.

15.2 Cost of ADR

All ADR costs shall be borne by the Company.

Players shall not be charged for access to ADR.

15.3 Referral Process

Where a player remains dissatisfied after receipt of the Final Complaint Decision, the player may submit the matter to ADR.

The Company shall provide:

- ADR contact details;
 - Complaint file reference;
 - Instructions for referral.
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15.4 Cooperation with ADR

The Company shall:

- Cooperate fully with ADR investigations;
 - Provide requested records promptly;
 - Comply with applicable ADR procedures.
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15.5 ADR Outcomes

The Company acknowledges CGA guidance that ADR outcomes are expected to be binding upon operators.

Nothing within this Policy shall restrict any legal rights available to the player under applicable law.

16. ROLE OF THE CURAÇAO GAMING AUTHORITY

The CGA:

- Does not adjudicate individual player disputes;
- Does not act as ADR provider;
- Does not routinely overturn complaint decisions.

However, information arising from complaints may be used by the CGA for:

- Regulatory supervision;
- Compliance reviews;
- Enforcement action;
- Licensing decisions.

Players retain the right to contact the CGA concerning suspected regulatory breaches or misconduct.

17. COMPLAINT REGISTER

17.1 Register Requirement

The Company shall maintain a central Complaint Register covering all Complaints and Disputes received across all brands operated under the Company's Curaçao licence.

The Complaint Register shall be maintained under the ownership and oversight of the Compliance Officer.

The Register may be maintained electronically provided that:

- Appropriate access controls are implemented;



- Records are tamper-resistant;
 - Records are capable of being exported upon request;
 - Historical entries cannot be altered without an audit trail.
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17.2 Minimum Information Requirements

The Complaint Register shall contain, at a minimum:

- Complaint reference number;
 - Date received;
 - Date acknowledged;
 - Player username;
 - Player account number;
 - Jurisdiction of player;
 - Complaint category;
 - Summary of issue;
 - Assigned investigator;
 - Date investigation commenced;
 - Date investigation concluded;
 - Outcome;
 - Amount in dispute (if applicable);
 - Date of final response;
 - ADR referral status;
 - ADR outcome (if applicable);
 - Root cause category;
 - Corrective action implemented.
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17.3 Regulatory Access

The Company shall provide Complaint Register records to the Curaçao Gaming Authority upon request.

The Compliance Officer shall ensure that records are readily retrievable and capable of being provided within the timeframe requested by the CGA.



18. MANAGEMENT INFORMATION AND REPORTING

18.1 Management Information

The Compliance Officer shall prepare periodic complaint management information reports for Senior Management.

Reports shall include:

- Number of Complaints received;
 - Number of Responsible Gambling Complaints;
 - Number of Complaints upheld;
 - Number of Complaints rejected;
 - Number of Complaints escalated to ADR;
 - Average resolution times;
 - Root cause analysis;
 - Emerging risks;
 - Regulatory concerns.
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18.2 Escalation Thresholds

The Compliance Officer shall immediately notify Senior Management where:

- A complaint indicates a potential breach of law;
 - A complaint indicates a failure of Responsible Gambling controls;
 - A complaint may result in regulatory sanctions;
 - A complaint concerns significant financial exposure;
 - Multiple similar complaints indicate a systemic failure.
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18.3 Regulatory Reporting

The Company shall comply with all complaint reporting obligations imposed by:

- The LOK;
- CGA licence conditions;
- CGA guidelines;
- Any subsequent regulatory notices.

The Compliance Officer shall maintain evidence of all regulatory submissions.



19. ROOT CAUSE ANALYSIS

19.1 Objective

The Company shall utilise complaint information to identify operational, compliance and customer protection weaknesses.

19.2 Root Cause Categories

Each Complaint shall be assigned one or more root causes including:

- Human error;
 - Training deficiency;
 - Technical system failure;
 - Third-party supplier issue;
 - Trading error;
 - Responsible Gambling control failure;
 - Policy deficiency;
 - Communication failure;
 - Fraud attempt;
 - Regulatory compliance issue.
-

19.3 Corrective Actions

Where root causes are identified, corrective actions may include:

- Additional staff training;
- System changes;
- Policy updates;
- Procedural amendments;
- Third-party supplier remediation;
- Enhanced monitoring.

All corrective actions shall be documented.



20. GOVERNANCE AND OVERSIGHT

20.1 Policy Ownership

This Policy is owned by the Compliance Officer.

The Compliance Officer is responsible for:

- Policy maintenance;
 - Monitoring compliance;
 - Regulatory engagement;
 - Complaint governance.
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20.2 Board Oversight

The Board of Directors shall receive periodic reporting concerning:

- Complaint volumes;
 - Significant complaints;
 - ADR outcomes;
 - Regulatory concerns;
 - Responsible Gambling complaints.
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20.3 Independence

Individuals responsible for reviewing Complaints shall not review matters in which they were directly involved.

Where a conflict of interest exists, an alternative reviewer shall be appointed.

21. TRAINING REQUIREMENTS

All employees involved in complaint handling shall receive training covering:

- Complaint handling procedures;
- Responsible Gambling obligations;
- Vulnerable player identification;
- Escalation procedures;
- Data protection requirements;



- ADR procedures;
- Record keeping obligations.

Training shall be conducted:

- Upon commencement of employment;
- Following material policy changes;
- At least annually thereafter.

Training records shall be retained for a minimum of five years.

22. DATA PROTECTION AND CONFIDENTIALITY

The Company shall process personal information obtained during complaint investigations in accordance with applicable data protection laws.

Information obtained through complaint investigations shall:

- Be used only for legitimate purposes;
- Be accessible only to authorised personnel;
- Be retained securely;
- Be disclosed only where legally permitted or required.

The Company shall ensure that complaint records are protected against:

- Unauthorised access;
 - Loss;
 - Destruction;
 - Alteration.
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23. RECORD RETENTION

The Company shall retain all complaint-related records for a minimum of five (5) years.

Records include:

- Complaint forms;
- Communications;
- Internal investigation notes;
- Supporting evidence;



- Complaint decisions;
- ADR correspondence;
- ADR decisions;
- Management reports.

Longer retention periods may apply where required by law, litigation holds, regulatory investigation or other legal obligations.

24. POLICY BREACHES

Failure by employees to comply with this Policy may result in:

- Additional training;
- Formal management action;
- Disciplinary proceedings;
- Regulatory escalation where appropriate.

Material breaches shall be reported to the Compliance Officer immediately.

The Compliance Officer shall determine whether escalation to Senior Management or the CGA is required.

25. REVIEW AND APPROVAL

This Policy shall be reviewed:

- At least annually;
- Following material regulatory changes;
- Following significant complaint trends;
- Following significant ADR decisions;
- Following CGA recommendations.

All amendments shall be approved by the Board of Directors.

APPENDIX A – COMPLAINT SUBMISSION FORM

The Company's Complaint Submission Form shall contain:



1. Full Name
 2. Username / Account Number
 3. Residential Address
 4. Country of Residence
 5. Email Address
 6. Date of Complaint
 7. Date of Incident
 8. Complaint Category
 9. Description of Complaint
 10. Supporting Documentation
 11. Desired Resolution
 12. Declaration of Accuracy
-

APPENDIX B – COMPLAINT CATEGORY MATRIX

Financial

- Deposits
- Withdrawals
- Payment Processing
- Account Balances

Betting

- Market Settlement
- Trading Decisions
- Event Outcomes
- Void Bets

Responsible Gambling

- Self-Exclusion
- Cooling-Off
- Vulnerable Persons
- Marketing Restrictions

Compliance

- KYC
- Source of Funds
- AML Reviews
- Account Restrictions



Technical

- Website Performance
- Software Errors
- Platform Availability

Customer Service

- Service Quality
- Communication
- Delays

Privacy

- Personal Data
- Data Subject Rights

Other

- Regulatory Concerns
 - General Complaints
-

APPENDIX C – COMPLAINT HANDLING WORKFLOW

Step 1: Complaint Received



Step 2: Complaint Registered



Step 3: Acknowledgement Issued



Step 4: Initial Investigation



Step 5: Operational Review



Step 6: Compliance Review (if required)





Step 7: Final Complaint Decision



Player Satisfied?

YES → Complaint Closed

NO → ADR Referral (EGIS ADR)



ADR Decision



Matter Closed





APPENDIX:

CANARY ALLEY B.V. PLAYER COMPLAINTS POLICY

Effective Date: 09/06/2026

Version: 2.0

1. INTRODUCTION

Canary Alley B.V. is committed to providing players with a fair, transparent and efficient complaints process.

This Player Complaints Policy explains how players may raise concerns, how complaints will be investigated, and the options available if a player remains dissatisfied with the outcome.

This Policy applies to all gaming products and services offered by Canary Alley B.V. under its Curaçao gaming licence.

Complaints may be submitted free of charge.

2. HOW TO CONTACT US

Players who wish to raise a complaint should first contact our Customer Support Team.

Email

contactus@orbitexch.com

Website

Players may also use any complaint submission form made available on the relevant website operated by Canary Alley B.V.



3. WHAT IS A COMPLAINT?

A Complaint is a written expression of dissatisfaction regarding any aspect of the services provided by Canary Alley B.V.

Examples include:

- Deposits;
 - Withdrawals;
 - Bonus disputes;
 - Account restrictions;
 - Account verification requirements;
 - Market settlement disputes;
 - Responsible Gambling concerns;
 - Technical issues;
 - Customer service concerns;
 - Privacy or personal data concerns.
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4. WHO MAY SUBMIT A COMPLAINT?

Complaints may only be submitted by:

- The registered account holder; or
- A person legally authorised to act on behalf of the registered account holder.

For security reasons, we may request information to verify the identity of the complainant.

5. WHEN MUST A COMPLAINT BE SUBMITTED?

Complaints should normally be submitted within six (6) months of:

- The incident giving rise to the complaint; or
- Settlement of the relevant wager; or
- Completion of the relevant sporting event, market or game.

Complaints submitted outside this period may be reviewed at our discretion where exceptional circumstances exist.



6. HOW TO SUBMIT A COMPLAINT

To assist us in investigating your complaint efficiently, please provide:

- Full name;
- Username or account number;
- Email address;
- Residential address;
- Date of the incident;
- Description of the issue;
- Any supporting evidence;
- Details of the outcome you are seeking.

Incomplete complaints may require additional information before they can be investigated.

7. OUR COMPLAINT HANDLING PROCESS

Stage 1 – Customer Support Review

Our Customer Support Team will attempt to resolve your complaint directly.

Many issues can be resolved quickly at this stage.

Stage 2 – Internal Investigation

If Customer Support cannot resolve the matter, your complaint will be referred to the appropriate internal team for investigation.

Depending on the nature of the complaint, this may involve:

- Trading specialists;
 - Payment specialists;
 - Technical teams;
 - Responsible Gambling specialists;
 - Compliance personnel.
-



Stage 3 – Compliance Review

Where appropriate, complaints may be escalated to the Compliance Officer for independent review.

The Compliance Officer may review:

- Regulatory concerns;
 - Responsible Gambling matters;
 - Significant disputes;
 - Repeated complaints;
 - Complex investigations.
-

8. COMPLAINT RESPONSE TIMES

Responsible Gambling Complaints

Responsible Gambling complaints are prioritised due to the importance of player protection.

Within two (2) calendar days of receiving a Responsible Gambling complaint we will:

- Confirm receipt;
- Explain how the complaint will be handled;
- Provide an estimated resolution timeframe.

We will use best efforts to resolve Responsible Gambling complaints within five (5) business days.

If additional time is required, we will notify you and explain the reasons for the delay.

All Other Complaints

Within one (1) week of receiving a complaint we will:

- Confirm receipt;
- Provide a complaint reference number;
- Explain the complaint handling process;
- Provide an estimated resolution timeframe.

We aim to resolve complaints within four (4) weeks.



Where additional time is required due to complexity or the need for further information, we may extend this period once by up to four (4) additional weeks.

If an extension is required, we will notify you in writing.

9. FINAL DECISION

At the conclusion of our investigation, you will receive a written Final Complaint Decision.

The Final Complaint Decision will include:

- A summary of your complaint;
- Our findings;
- Any relevant rules or terms relied upon;
- The outcome of the investigation;
- Information regarding ADR rights.

Possible outcomes include:

- Complaint Upheld;
 - Complaint Partially Upheld;
 - Complaint Rejected;
 - Complaint Resolved by Agreement;
 - Complaint Referred to ADR.
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10. ALTERNATIVE DISPUTE RESOLUTION (ADR)

If you remain dissatisfied after receiving our Final Complaint Decision, you may refer the matter to Alternative Dispute Resolution ("ADR").

Canary Alley B.V. currently provides access to:

EGIS ADR

Website: <https://egis-adr.com>

ADR is provided free of charge to players.

Canary Alley B.V. bears the costs associated with the ADR process.



You may be required to complete our internal complaints process before ADR can review your dispute.

11. WHAT ADR DOES

ADR is an independent dispute resolution process.

ADR may:

- Review evidence from both parties;
- Request additional information;
- Make an independent determination;
- Recommend or require corrective action.

ADR operates independently from Canary Alley B.V.

12. ROLE OF THE CURAÇAO GAMING AUTHORITY

The Curaçao Gaming Authority ("CGA") does not normally resolve individual player disputes.

The CGA does not act as an ADR provider.

However, the CGA may use complaint information as part of its:

- Regulatory supervision;
- Compliance monitoring;
- Licensing activities;
- Enforcement activities.

Players who believe a regulatory breach has occurred may contact the CGA directly.

13. COURT RIGHTS

Nothing in this Policy restricts any rights available to players under applicable law.



In accordance with Curaçao gaming legislation, the contractual relationship between Canary Alley B.V. and its players is governed by Curaçao law.

Any legal proceedings relating to that relationship shall be brought before the competent courts of Curaçao.

14. RECORD KEEPING

Canary Alley B.V. maintains records of complaints and disputes for regulatory and operational purposes.

Complaint information may be retained for at least five (5) years or longer where required by law.

15. POLICY REVIEW

This Policy may be amended from time to time to reflect:

- Regulatory developments;
- Operational changes;
- Industry best practices;
- Improvements to complaint handling procedures.

The most recent version of this Policy will always be made available through our websites.

CONTACT DETAILS

Canary Alley B.V.

Complaints Email: contactus@orbitexch.com

ADR Provider: EGIS ADR

Applicable Law: Curaçao Law

Jurisdiction: Courts of Curaçao