

Player Complaints Policy of Apalonik B.V.
Version 1

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1. Introduction

This policy outlines how Apalonik B.V. (the “Company”) handles complaints submitted by players in relation to its gaming services. It is drafted in line with Article 5.3 of the National Ordinance on Games of Chance (LOK) and applies to all games of chance offered by the Company.

2. Complaint Submission Procedure

2.1. What Constitutes a Complaint

A complaint refers to any incident, system issue, or Company action (or inaction) that the player believes negatively impacted their experience or rights. Complaints may relate to:

- Deposit or withdrawal problems;
- Bonus, bet, or game outcome disputes;
- Account suspension or closure;
- Technical errors affecting gameplay;
- Data privacy or responsible gambling concerns;
- Alleged unfair treatment or regulatory non-compliance.

2.2. How to File a Complaint

Players can submit complaints within six (6) months of the issue occurring. For P2P or ante-post fixed odds betting, this period begins after the final result is known.

Complaints must be submitted directly via:

1. Live chat or email to customer support, or
2. The designated "Complaints" section of the website.

By filing a complaint, the player confirms that it is not simultaneously under review by third parties (e.g., ADR, court, or regulator).

Required details include:

- Full name and address
- Email address
- Date of complaint
- Description of issue and category
- Supporting documents, if applicable
- Preferred language

- Complaint type.

The complaint form is also accessible via the site's Terms and Conditions.

2.3. Acknowledgement of Receipt

The Company will acknowledge receipt of the complaint within 7 days and provide:

- Confirmation of receipt;
- An explanation of next steps;
- Estimated timeline for resolution.

2.4. Complaint Resolution

Complaints will be addressed within 4 weeks. If extra time is needed due to complexity or lack of data, the process may be extended once by up to 4 additional weeks. The player will be informed in writing of any delay.

The final reply will include:

- Explanation of findings and decision, or
- Justification for refusal, if applicable

2.5. Responsible Gaming-Related Complaints

Complaints involving responsible gambling matters are prioritized. The Company ensures they are resolved with appropriate urgency and care.

3. Alternative Dispute Resolution (ADR)

If the player is dissatisfied with the final outcome, they may refer the matter to an independent ADR provider. The Company will cooperate fully with the ADR entity once a certified list becomes available.

ADR contact details are provided on the website and in the Terms and Conditions.

4. Referral to the Curaçao Gaming Authority (CGA)

If a player believes there has been a regulatory breach, they may report it directly to the CGA using the official online form.

The CGA does not mediate individual transaction disputes.

5. Record Retention and Reporting

The Company keeps detailed logs of all complaints for a minimum of five (5) years.

Biannual reports are submitted to the CGA (by January 15 and June 15), including:

- Total number of complaints received;
- Total resolved (settled and declined);
- Unresolved/pending complaints;
- Breakdown by category;
- ADR referrals and results;
- Cases escalated to legal action.