

Super Awesome Gaming Alliance B.V.

T/A Play.win

Player Complaints Procedures

Inclusive of

Alternative Dispute Resolution (ADR) Policy

&

Procedures

Version: 1.0

Owner: Compliance Officer / Head of Legal

Effective Date: 30th of November 2025

Review Frequency: Annual or when CGA/LOK guidance changes

1. Legal & Regulatory Basis

The National Ordinance on Games of Chance (LOK), effective 24 December 2024, establishes the new regulatory framework for games of chance in Curacao. Licensed operators must comply with its provisions and the requirements of the Curaçao Gaming Authority (CGA).

The CGA requires operators to:

- Implement accessible complaint-handling procedures.
- Provide players with free access to independent Alternative Dispute Resolution (ADR) services.
- Only use ADR providers that are independent, impartial, and CGA-approved.

This document sets out SAGA B.V.'s ADR Policy and Procedures, ensuring full alignment with LOK obligations and CGA guidance.

2. Purpose

To establish a clear, fair and transparent framework for handling player complaints and disputes. This ensures compliance with CGA requirements and offers players free access to independent ADR mechanisms.

3. Scope

This policy applies to all player complaints relating to SAGA's products and services, including:

- Account creation, verification, and management.
- Deposits, withdrawals, and payments.
- Game fairness, performance, and technical issues.
- Promotions, bonuses, and wagering disputes.
- Any other dispute arising from SAGA's gaming operations.

4. Definitions

- **Complaint:** Any expression of dissatisfaction regarding SAGA's services.
- **Dispute:** A complaint unresolved through internal processes, requiring ADR.
- **Player / Complainant:** A registered customer of Play.win by raising a complaint.
- **ADR Provider:** An independent third party approved by the CGA to resolve disputes.
- **CGA:** Curaçao Gaming Authority.

5. Principles

SAGA's ADR framework is guided by:

- **Accessibility:** Free and easy for players to use.
- **Independence:** ADR providers are impartial and not affiliated with SAGA.
- **Transparency:** Clear procedures, timelines, and written decisions.
- **Fairness:** Balanced consideration of evidence from all parties.
- **Timeliness:** Swift responses and resolutions.
- **Cooperation:** Full collaboration with ADR providers and the CGA.

6. Roles & Responsibilities

- **Board of Directors:** Overall responsibility for compliance.
- **Compliance Officer:** Maintains policy, manages the complaints register, liaises with ADR and CGA, and conducts reviews.
- **Customer Support Team:** First-line complaint intake, handling, and escalation.
- **Legal Team:** Assists with complex disputes and ADR coordination.
- **Technical & Payments Teams:** Provide supporting evidence (logs, transaction records).

7. ADR Provider Selection

- Only ADR providers approved by the CGA will be used.
- Providers must demonstrate independence, impartiality, competence, and transparent procedures.
- PlayLotto will publish ADR provider details on its website and player communication channels.

8. Internal Complaints Procedure

1. **Submission:** Complaints can be submitted via:
 - Website complaint form.
 - Email: support@play.win
 - Live chat escalation.
 - Postal mail.
2. **Acknowledgement:**
 - Automated confirmation upon receipt.
 - Human acknowledgement within **48 hours**.
3. **Logging & Triage:**
 - Complaints are entered into the **Complaints Register** with a unique reference.
 - Categorised by type and urgency.

4. Investigation:

- Conducted by Customer Support with access to all relevant systems and evidence.
- Written outcome provided to player, with reasons.

5. Escalation:

- Unresolved complaints are escalated to the Compliance Officer/Legal Team.
- If still unresolved after internal timelines, players are informed of ADR rights.

9. Escalation to ADR

- Players may escalate unresolved complaints to ADR after 30 calendar days or sooner upon request.
- SAGA will provide the ADR provider's details and assist with referral.
- ADR services are free of charge for players.
- PlayLotto will submit all required evidence to the ADR provider within the specified deadlines.
- Binding ADR decisions will be fully implemented; non-binding decisions will be considered in good faith.

10. Timelines

- **Acknowledgement:** Immediate automated + 48 hours human.
- **Internal resolution:** Within 15 business days (extendable to 30 business days for complex cases).
- **Escalation to ADR:** Available after 30 calendar days.
- **ADR cooperation:** Evidence submitted within ADR deadlines.

11. Recordkeeping & Reporting

- The Complaints Register is maintained for at least 5 years.
- Monthly management reports and quarterly compliance reviews.
- Annual complaints and ADR report submitted to Board and CGA (if required).

12. Data Protection & Confidentiality

- All handling of complaints complies with data protection laws.
- Only necessary data is shared with ADR providers, using secure channels.

13. Player Communication

- SAGA will publish a clear **Complaints & ADR Information Page** on its website. www.play.win
- Information will include how to submit complaints, timelines, and ADR provider details.

14. Staff Training

- All relevant staff receive training on complaint handling, ADR procedures, and evidence preservation.
- Refresher training is conducted annually.

15. Monitoring & Review

- Quarterly compliance audits.
- Annual policy review or earlier if regulations change.
- Continuous improvement is implemented where systemic issues are found.

16. Enforcement of ADR Decisions

- **Binding ADR decisions:** implemented fully within deadlines.
- **Non-binding ADR decisions:** considered in good faith; reasons provided if not adopted.

17. Annexes

Annexe A — Complaints Register Template

| Reference | Date Received | Player ID | Category | Assigned To | Actions Taken | Outcome | Date Closed | Escalated to ADR? | Notes |

Annexe B — Complaint Acknowledgement Email Template

Subject: Acknowledgement of Your Complaint [Reference Number]

Dear [Player Name],

Thank you for contacting PlayWin. We confirm receipt of your complaint (reference: [XXXX]) on [date].

Our team will review your case and provide you with an update within 15 business days. If your complaint requires further investigation, we will inform you of any delays and the expected resolution date.

Sincerely,

PlayWin Complaints Team

Annexe C — Complaint Outcome Letter Template

Subject: Complaint Outcome [Reference Number]

Dear [Player Name],

Following our investigation into your complaint (reference: [XXXX]), we provide the following outcome:

[Details of findings, resolution, corrective action if any].

If you are dissatisfied with this decision, you may escalate the matter to our independent ADR provider. Details are available at [website link].

Sincerely,

Play.Win Complaints Team

Annexe D — ADR Referral Checklist

- Copy of original complaint and acknowledgement.
- Internal investigation notes and findings.
- Evidence (logs, transactions, correspondence).
- Outcome letter to player.
- Player's request for ADR referral.
- Completed referral form to ADR provider.

Annexe E — Data Sharing Agreement (Summary)

- Data shared will be limited to complaint-related information.
- Secure transmission methods (encrypted email, portal upload).
- An ADR provider must handle data in line with GDPR equivalent safeguards.

Annexe F — Reporting Templates

Monthly Report:

- Number of complaints received.
- Categories and trends.
- Average resolution time.
- Escalations to ADR.

Annual Report:

- Total complaints received and resolved.
- ADR referrals and outcomes.
- Policy effectiveness review.
- Recommendations for improvements.

18. Quick Reference Checklist

1. Receive complaint → acknowledge & log.
2. Investigate → aim for resolution in 15 business days.
3. If unresolved → escalate internally, then inform the player of ADR rights.
4. Refer to the ADR provider → submit evidence.
5. Implement ADR decision → notify player & CGA if required.
6. Record outcome → update reports & register.

19. Non-Compliance

Failure to comply with this policy may result in regulatory sanctions, reputational harm, or internal disciplinary measures. All breaches must be reported to the Compliance Officer immediately.

20. Document Control

- **Owner:** Compliance Officer
- **Effective Date:** [insert date]
- **Next Review Date:** [insert date]
- **Version History:** logged in Document Control Register