

PLAYER COMPLAINTS POLICY

A2F B.V.

Policy Version: 1.0 (Effective: 9 of January 2026)

Legal Entity Name	A2F B.V.
Legal Status	Limited Liability Company (registered under the laws of Curaçao)
Company Number	151745
Registered Address	Abraham Mendez Chumaceiro Boulevard 50, Willemstad, Curaçao
License Number (GCB)	OGL/2024/298/0109
Operational Websites	apostasbf.com / aposrasnow.com / bet-bra.com / betuppro.com / bolsadeaposta.com / captainpunt.com / drinbet.com / fulltbet.com / peakodds.com / punterplay.com / sharpbet.com / superodds88.com / tradeball.com / oddjusta.com
Responsible Office	Compliance Department
Next Review Date	January 2027

1. Policy Overview

A2F B.V. is committed to offering its players a secure, transparent, and accountable gambling environment. As a holder of a license issued by the Curaçao Gaming Authority (CGA), and in compliance with the National Ordinance on Games of Chance (Landsverordening op de Kansspelen, LOK), this Player Complaints Policy serves as a formal and public commitment to uphold fair and effective mechanisms for receiving, processing, and resolving player complaints.

This policy ensures that all registered players across A2F B.V.'s brands, can raise concerns about any aspect of the services offered. These include, but are not limited to: deposits and withdrawals, bonus terms, account closures, perceived unfair treatment, technical failures, and responsible gambling protections.

The overarching objective of this policy is to guarantee that all complaints are handled with impartiality, diligence, confidentiality, and in strict accordance with legal and regulatory expectations. It outlines internal procedures, player rights, timelines for responses, and access to external dispute resolution via Alternative Dispute Resolution (ADR) providers certified by the CGA.

This document is binding on all personnel of A2F B.V., including compliance officers, customer support representatives, managers, and third-party contractors who engage directly or indirectly with players. The policy shall be made available as a standalone document, accessible via the homepage and registration pages of each brand operated by A2F B.V., and referenced clearly in the Terms and Conditions.

2. Scope and Applicability

This Player Complaints Policy applies to all players who engage with any of the platforms operated by A2F B.V., regardless of the player's jurisdiction of residence. The policy extends across every product, brand, and service offered by A2F B.V. under its Curaçao Gaming Authority (CGA) license OGL/2024/298/0109.

This policy is legally binding and governs the complaints-handling relationship between A2F B.V. and its players, including prospective players (i.e., persons who attempted to register but were denied access), active players (those currently using any of the services), and former players (whose accounts may be suspended, inactive, or closed).

This policy covers:

- Disputes related to deposit and withdrawal processing.
- Disagreements over bonus terms and conditions, including promotional fairness.
- Complaints regarding game outcomes, RNG behavior, or possible technical errors.
- Issues related to account suspension, closure, or other operational restrictions.

- Complaints tied to responsible gambling, such as implementation of self-exclusion or limits.
- Player claims involving KYC and AML procedures, such as verification delays or document handling.
- Privacy-related complaints and misuse of personal data.
- Any other aspect of the operator's conduct that a player reasonably considers a breach of contract, terms, or regulatory obligations.

This policy also applies to all support channels, including:

- Email communication
- Live chat platforms
- Contact forms
- Complaints submission forms
- Customer support conducted via third-party platforms (e.g., Telegram or Microsoft Teams)

Language and Accessibility

The policy is published in English and shall be made available in additional languages as required for A2F B.V.'s target markets. Complaint submission channels must be equally accessible to players with disabilities, and customer service must assist those who require help in submitting a complaint.

This document is part of a broader compliance and governance framework, which also includes:

- AML/CFT Policy
- Responsible Gambling Policy
- Terms and Conditions
- Data Protection and Privacy Policy
- Internal Control Procedures

All policies are aligned with the requirements under Article 5.3 of the LOK, as interpreted and enforced by the CGA.

3. Definitions

For the purpose of this Complaints Policy, the following definitions shall apply. These terms are aligned with the LOK, CGA guidance, and the internal standards of A2F B.V.:

3.1 Player Interaction

“Player Interaction” refers to any written or verbal communication initiated by a registered player (or prospective player) directed toward A2F B.V. staff. This includes, but is not limited to, general inquiries, service feedback, support requests, and formal complaints.

Interaction may occur through various communication channels including:

- Email
- Live chat
- Contact forms on the website
- Social media platforms (if monitored)
- Messaging applications (e.g., Telegram, Teams)

A player interaction becomes a complaint once the dissatisfaction expressed is formally registered in accordance with Section 5 of this policy.

3.2 Complaint

A Complaint is a specific and formal expression of dissatisfaction by a player regarding a product, service, or interaction provided by A2F B.V. A complaint must:

- Be submitted in writing (via email or online complaint form)
- Relate to a player’s direct experience
- Contain the minimum required information as outlined in Section 5
- Seek a resolution or response from the operator

Complaints may concern matters of:

- Payment disputes
- Bonus application or removal
- Breaches of terms and conditions
- Account actions or restrictions
- Technical game failures
- Responsible gambling safeguards
- Customer service treatment

Only complaints submitted directly by the player themselves will be accepted. No third-party complaints are permitted unless authorized under specific legal conditions.

3.3 Dispute

A Dispute arises when:

- A complaint has been submitted and processed internally by A2F B.V.
- The player remains dissatisfied with the final decision or the manner in which the complaint was handled
- The player wishes to escalate the matter externally via an Alternative Dispute Resolution (ADR) process or to court proceedings (where permitted)

Disputes also include cases where:

- The complaint concerns regulatory breaches, in which case the player may contact the CGA
- There is a failure to provide a final resolution within the prescribed timeline

Not all disputes are eligible for legal action or ADR. The nature of the original complaint, supporting evidence, and player conduct will determine admissibility.

3.4 Resolution

A Resolution is the official determination by A2F B.V. of a player complaint. A resolution may include:

- Acceptance of the complaint with full or partial remedy
- Rejection of the complaint, with detailed justification
- Referral to an ADR body
- Termination of the complaint due to insufficient evidence, abusive conduct, or non-cooperation

Resolutions are communicated in writing, with details on appeal rights and escalation options.

4. Guiding Principles

A2F B.V. recognizes that a well-designed complaints process is not only a regulatory obligation under the Curaçao Gaming Authority (CGA), but also a cornerstone of maintaining trust and accountability with its player base.

This policy is governed by the following guiding principles, which shape the structure, tone, and conduct of complaint handling at every stage:

4.1 Fairness

All complaints are handled impartially and without prejudice. No complaint is dismissed or prejudged based on the player's history, value to the company, or manner of communication, provided that communication remains respectful. Objective facts, transactional records, game logs, and terms and conditions form the basis for all complaint decisions.

4.2 Accessibility

Players must be able to submit complaints without barriers. The complaints procedure is clearly explained in:

- Terms and Conditions
- A dedicated Complaints page
- The FAQ section
- Live support channels

Complaints can be submitted via multiple formats (email, form, live chat), in English or the language used on the website accessed by the player.

4.3 Timeliness

All complaints are processed within a strict and reasonable time frame. Players are informed of:

- Acknowledgment within 1–2 business days
- Expected duration for review
- Justifications for any delays

Timeframes are detailed further in Sections 6 and 7.

4.4 Confidentiality

All player complaints and dispute records are handled as confidential. Only personnel assigned to compliance, legal, or senior operations roles have access to complaint records. Complaints are stored on encrypted servers in line with GDPR and local data protection regulations.

4.5 Accountability

A2F B.V. documents every step of the complaint lifecycle. From receipt to closure (or escalation), an internal tracking system logs:

- Communications sent and received
- Staff members involved
- Documents reviewed
- Final decision issued

This ensures transparency and verifiability in case of regulatory review.

4.6 Proportionality

The level of investigation and oversight applied to a complaint corresponds to the nature and potential severity of the issue. For example:

- A €10 bonus issue may receive expedited handling
- A responsible gambling breach receives senior-level review
- A claim involving legal implications (e.g., fraud, data breach) may be escalated to management or external counsel

5. Submission of Complaints

A2F B.V. encourages players to raise any dissatisfaction at the earliest opportunity. To facilitate structured intake and efficient handling, players must submit complaints using one of the formal channels listed below.

5.1 Acceptable Methods of Submission

A complaint may be submitted by a registered player through any of the following official channels:

1. Online Complaint Form
Accessible via each brand website's Contact or Support section. Available in English and, where required, in localized languages.
2. Email to: info@dreambet.com
Players must include identifying information and a clear summary.
3. Live Chat Escalation
A chat agent may escalate the interaction to the internal complaints queue. The player will then receive a formal acknowledgment and reference ID.

All complaints must originate from the email or account associated with the registered player. Submissions via third parties (agents, friends, attorneys) will only be accepted where explicit legal authorization is attached.

5.2 Required Information for a Valid Complaint

To allow timely and effective review, the following information must be included in all complaint submissions:

- Full name of the player
- Registered email address and/or username
- Account ID (if applicable)
- Date and time of the incident or dispute
- Nature of the complaint (e.g., withdrawal issue, game crash)
- Summary of the issue
- Any screenshots, transaction references, or supporting documents

Players who fail to provide sufficient information will receive one (1) request for additional details. If no response is received within 14 days, the complaint will be closed as unprocessable.

5.3 Complaint Timeframe (Window for Submission)

Players must submit complaints within six (6) months of the incident giving rise to the complaint. The clock starts:

- At the date of bet settlement (for regular wagers)
- Upon completion of an event (for ante-post or futures)
- From the time of failed withdrawal or bonus removal

In live or in-running betting, players are encouraged to submit the complaint as quickly as possible due to the potential volatility and expiration of data logs.

A2F B.V. reserves the right to refuse complaints submitted after the 6-month period, except in cases involving:

- Responsible gambling failures
- Breaches of consumer protection or licensing regulations
- Data protection violations

6. Internal Complaint Handling Process

The internal complaint resolution framework of A2F B.V. is designed to ensure that all player complaints are addressed fairly, systematically, and within legally defined timeframes. This section details how a complaint moves through the resolution process, from acknowledgment to closure or escalation.

6.1 Complaint Acknowledgment

Upon receiving a complaint, A2F B.V. shall:

- Send a written acknowledgment to the player within 1 business day (or 2 calendar days if submitted on weekends/holidays).
- Assign a unique complaint reference number to facilitate tracking and communication.
- Outline the complaint handling steps and expected timeframes.
- Identify the complaint handler or team responsible.

Players will also be informed of their rights to escalate the matter internally or externally, should they remain dissatisfied at any stage.

6.2 Investigation and Review

Once acknowledged, the complaint is passed to the Complaints Officer or a member of the Compliance Department, depending on the subject matter and risk level. The investigation process includes:

- Retrieval of transaction records and logs (e.g., game logs, payment records, chat logs).
- Cross-referencing of the player's claims with internal system data.
- Review of applicable Terms and Conditions, bonus rules, or policy documents.
- Assessment of whether any operational, human, or technical error occurred.

If required, the operator may:

- Contact the player to request additional evidence (e.g., screenshots, bank statements).
- Involve relevant departments (payments, risk, IT, etc.) in the fact-finding process.

All findings and communications are documented in an internal complaint case file.

6.3 Resolution Timeline and Outcomes

A2F B.V. strives to fully resolve all complaints within 28 calendar days of receipt.

- If more time is needed (due to complexity, third-party involvement, or missing data), the operator may extend the resolution period by up to an additional 28 calendar days, with written notice to the player explaining the reason.
- If a player fails to respond to an information request within 14 calendar days, the complaint may be closed as “unable to process.”

Possible resolution outcomes:

Resolution Status	Description
Upheld (Full)	The complaint is accepted and a remedy is offered (e.g., refund, bonus credit, correction).
Upheld (Partial)	Part of the complaint is accepted; a proportional remedy is offered.
Rejected	The complaint is not upheld. Full reasoning and evidence are provided.
Referred	The player is advised to contact an ADR provider or the CGA for escalation.

All players will receive a final written response, clearly stating the outcome, justification, and next steps (if applicable). This is referred to as the Final Determination Letter.

7. Responsible Gambling Complaints

Given the potential risks to vulnerable players and the reputation of the gaming sector, complaints related to responsible gambling are subject to enhanced priority, scrutiny, and internal oversight.

7.1 Types of Responsible Gambling Complaints

These include, but are not limited to:

- Failure to action self-exclusion or deposit limit requests.
- Continued marketing to self-excluded or at-risk players.
- Allowing minors or unauthorized persons to access accounts.
- Ignoring red flags (e.g., excessive losses, erratic behavior, long play sessions).
- Insufficient reality checks, reminders, or game session warnings.
- Delays in implementing time-outs or permanent exclusions.

All such complaints are immediately flagged and escalated to the Responsible Gambling Compliance Lead.

7.2 Responsible Gambling Complaint Handling Timeline

Action	Timeline
Acknowledgment	Within 2 business days
Target resolution	Within 5 business days
Maximum extension	Up to 2 additional weeks, with written notice
Extension for player delay	Up to 2 additional weeks, only if the player is unresponsive

These cases are documented with enhanced rigor. A2F B.V. may also self-report failures to the CGA and take disciplinary action internally if procedural safeguards were violated.

8. Escalation and ADR (Alternative Dispute Resolution)

A2F B.V. is committed to ensuring that unresolved player complaints can be reviewed by a qualified, impartial third party. In line with CGA regulations and Article 5.3 of the LOK, all licensed B2C operators must offer players access to Alternative Dispute Resolution (ADR) free of charge.

8.1 ADR Policy and Process

If a player is not satisfied with the final response provided by A2F B.V., they may escalate the complaint to an ADR entity, provided the following conditions are met:

- The complaint has been formally submitted through A2F B.V.'s internal complaint process.
- The operator has issued a Final Determination Letter.
- The complaint is eligible under the ADR provider's terms (e.g., within time limits, value thresholds, and subject matter).

ADR Procedure Steps:

1. The player is referred to a CGA-approved ADR provider. A2F B.V. maintains contracts with at least one certified entity and updates this list as needed.
2. The player may submit the unresolved complaint to the ADR body free of charge.
3. The ADR provider reviews the case independently, requesting additional documents from both the player and the operator if necessary.
4. A decision is issued, typically within 60 days.

ADR decisions are final and binding on the operator, though not necessarily binding on the player (unless agreed to in the ADR terms).

Contact information for ADR providers is published:

- On each brand's complaint policy webpage
 - Within the Terms and Conditions
 - In the Final Determination Letter issued to the player
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8.2 Conditions and Legal Considerations

To prevent abuse or manipulation of the complaints system, the following ADR rules apply:

- Players may not submit the same complaint to multiple ADR entities.
- If a player abandons the ADR process, the complaint is considered closed and may not be reinitiated.
- If the player initiates legal proceedings, ADR is no longer applicable unless mandated by law.
- A2F B.V. will bear all costs of ADR referrals, including document compilation and any applicable filing or case review fees.

Players are strongly encouraged to cooperate with ADR officials and provide timely and accurate information. Abusive behavior or submission of fraudulent evidence may result in dismissal of the case.

9. Involvement of the Curaçao Gaming Authority (CGA)

The Curaçao Gaming Authority (CGA) is the regulatory body overseeing the conduct of licensees under the National Ordinance on Games of Chance (LOK). While the CGA does not directly resolve player-to-operator disputes, it plays an important supervisory role.

9.1 CGA's Role in Complaints

- The CGA does not act as a mediator in individual financial disputes, bonus claims, or service complaints.
- However, if a player believes that A2F B.V. has violated licensing conditions, regulations, or consumer protection laws, they may file a regulatory complaint through the CGA's official platform.
- Regulatory complaints may include:
 - Breaches of self-exclusion or responsible gambling requirements
 - Misleading terms and conditions
 - Failure to implement ADR or complaint procedures

- Unfair treatment or potential fraud

The CGA reserves the right to:

- Request complaint records from A2F B.V.
 - Conduct audits or compliance reviews
 - Enforce corrective actions, penalties, or license conditions
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9.2 Player's Right to Contact CGA

Players are informed that they have the right to contact the CGA directly using the online contact form at:

👉 <https://gamingcontrol.cw>

This is especially appropriate if:

- The complaint relates to structural or repeated failures by the operator.
- There is a lack of response or procedural integrity.
- The player believes A2F B.V. has operated in bad faith or outside the scope of its license.

While the CGA will not render a decision on an individual payout or refund, it will record the complaint, and may:

- Issue warnings or directives to the operator.
- Monitor complaint trends across licensees.
- Launch enforcement investigations if a pattern of misconduct emerges.

10. Use of Artificial Intelligence (AI)

As part of its digital operations, A2F B.V. utilizes various forms of Artificial Intelligence (AI) and automated decision-making tools to enhance user experience and internal efficiency. However, the use of AI in complaint handling is tightly regulated within this policy to ensure that fairness, accountability, and transparency are upheld.

10.1 Permissible Use of AI in Complaints

AI may be used in the following non-decisional functions:

- Automatically categorizing complaints by type (e.g., payment, game fairness, KYC).

- Prioritizing incoming tickets based on keywords (e.g., “urgent,” “RG issue,” “no payout”).
- Providing templated acknowledgment messages or directing users to the correct team.
- Identifying trends in complaint submissions across regions, product types, or times of day.

These tools are used to reduce human error in ticket classification, reduce waiting times, and route complaints efficiently to qualified staff.

10.2 Restrictions on AI Use

In accordance with CGA Guidelines and A2F B.V.'s internal ethics framework:

- AI shall not issue or draft final responses to player complaints.
- AI shall not process complaints related to Responsible Gambling (RG) — these require full human review due to their sensitivity and legal implications.
- Complex complaints involving fraud, account security, or multi-department issues must be handled manually by a senior complaints officer.

Where AI is used, a human is always assigned to review, validate, and sign off on any communications or determinations issued to the player.

10.3 Monitoring and Quality Assurance

The compliance department is responsible for:

- Monitoring the accuracy and consistency of AI categorization.
- Reviewing AI-assisted routing for fairness and impartiality.
- Auditing AI usage logs monthly.
- Ensuring that no AI system makes binding decisions on players.

Players are notified in the Complaints Policy and Terms and Conditions that AI may assist in the classification of their complaint, but not in the resolution.

11. Record-Keeping and Reporting Obligations

Maintaining thorough and secure records of all complaint activity is both a regulatory requirement and a best practice. A2F B.V. ensures robust documentation and transparent reporting in compliance with Article 5.3 of the LOK and CGA policy guidelines.

11.1 Internal Record-Keeping

For each complaint submitted, A2F B.V. stores a secure and auditable file that includes:

- The original complaint (email or form submission)
- All communications between the player and the operator
- Internal notes and investigation records
- Documents reviewed (screenshots, game logs, payment evidence)
- The final resolution (with justification)
- Whether the case was escalated to ADR or CGA

These records are maintained in encrypted servers and systems with access control restrictions.

All complaints are assigned a unique case ID and retained for a minimum of five (5) years from the date of resolution, or longer if required by data protection, taxation, or civil litigation law.

11.2 Reporting to the CGA

A2F B.V. submits structured complaints data to the CGA twice per year, with reporting deadlines as follows:

- 15 January (covering July to December of the prior year)
- 15 June (covering January to June of the current year)

Each report includes:

- Total number of complaints received
- Complaints resolved (by category and outcome)
- Unresolved or open cases at period end
- Number of cases referred to ADR
- Complaints involving Responsible Gambling issues
- Any complaint-related litigation or enforcement actions

The CGA may request ad hoc or expanded reporting during supervisory reviews or license renewals.

- **12. Transparency in Terms and Conditions**

- Transparency is a core value at A2F B.V., especially where players' rights and responsibilities are concerned. In accordance with Article 5.3 of the LOK and guidance issued by the CGA, this policy and all related complaint procedures are clearly disclosed in the operator's Terms and Conditions (T&Cs), as well as across its consumer-facing digital platforms.
- **12.1 Embedding in the Terms and Conditions**
 - Each of the operational websites features comprehensive T&Cs that contain the following complaint-related disclosures:
 - Clear reference to this Player Complaints Policy, with a direct link to the full document.
 - Explanation of how and where players may file complaints.
 - Timeline for acknowledgment and response.
 - Right to escalate complaints to ADR and, where appropriate, to the CGA.
 - Description of the implications of ADR outcomes (binding on the operator; not necessarily on the player).
 - A statement confirming that the CGA does not resolve transactional disputes but monitors systemic issues and regulatory compliance.
 - These references are maintained in the T&Cs and updated simultaneously when the Complaints Policy is revised.
- **12.2 Website Placement and Public Access**
 - In addition to the T&Cs, A2F B.V. ensures visibility of this policy through:
 - A standalone "Complaints" or "Dispute Resolution" page accessible via the main navigation or footer.
 - A "Help" or "Support" section linking to the policy.
 - The Responsible Gambling page, which cross-references complaint procedures relevant to self-exclusion and RG breaches.
 - The registration process, where players are required to confirm acceptance of the Complaints Policy and T&Cs via an opt-in checkbox.
 - These placement strategies guarantee that players cannot claim ignorance of complaint processes or their legal rights.
- **12.3 Multi-Language Accessibility**

- The primary language of communication is English. However, where A2F B.V. targets non-English speaking markets, translated summaries of the policy are made available. Translations are accurate, legally validated, and clearly state that the English version prevails in the event of any conflict.

- **13. Permitted Reasons for Complaint**

- A2F B.V. recognizes that the scope of legitimate player grievances is wide. Therefore, it maintains an inclusive and adaptive definition of what constitutes a valid complaint.
- The following categories are accepted as valid grounds for complaint, subject to evidence and compliance with submission requirements:

- **13.1 Financial and Transactional**

- Deposit not credited or delayed
- Withdrawal withheld, canceled, or limited without explanation
- Incorrect bet settlement
- Bonus not applied, removed, or altered post-wagering
- Currencies incorrectly displayed or exchanged
- Payout method refused without policy basis

- **13.2 Bonus and Promotion-Related**

- Confusion over bonus terms (e.g., max bet, wagering contribution)
- Bonus removal due to misunderstood play
- Disqualification from a tournament or promotion
- Failure to award loyalty points or cashback

- **13.3 Game Fairness and Technical Issues**

- Game freezing or disconnecting during wager
- Jackpot not triggered or improperly settled
- RNG-related suspicions
- Delay in refunding aborted rounds

- Loss of progress or session history

- **13.4 Account Management and Compliance**
- Unexplained account restriction or permanent closure
- Document requests not aligned with AML policy
- Repeated KYC requests despite prior completion
- Delays in verifying account
- Alleged breach of T&Cs not communicated clearly

- **13.5 Responsible Gambling**
- Ignored self-exclusion requests
- Deposit limits not implemented or exceeded
- Continued marketing post-exclusion
- No response to signs of problematic play
- Accessibility to minors or third parties

- **13.6 Privacy and Data Protection**
- Unlawful sharing of personal data
- Retention of documents beyond permitted duration
- Failure to comply with a player's data access or deletion request

- **13.7 Customer Service**
- Delayed or no reply to complaints or inquiries
- Rude or unprofessional staff behavior
- Conflicting information from support agents
- Inadequate or dismissive complaint resolutions
- All complaints must still be supported by factual detail and submitted via the designated channels. Frivolous, abusive, or intentionally false complaints may be rejected in accordance with Section 15.

14. Data Privacy and Confidentiality

A2F B.V. acknowledges that handling complaints involves access to sensitive personal data, transactional information, and private communications. Therefore, data privacy and confidentiality are central to the complaints process.

This section outlines the company's obligations and commitments under:

- The General Data Protection Regulation (GDPR)
- Curaçao data protection legislation
- Applicable industry standards and contractual responsibilities (e.g., with payment processors and ADR entities)

14.1 Lawful Basis for Processing

A2F B.V. processes complaint-related data under the lawful bases of:

- Contractual necessity: To investigate a claim under the gaming services agreement.
- Legal obligation: To meet compliance requirements under LOK and CGA rules.
- Legitimate interest: To monitor complaint trends and defend against potential litigation.

The player's express consent is not required to process a complaint, but transparency and safeguards must **be maintained**.

14.2 Scope of Data Processed

Data collected and processed in the context of complaints may include:

- Player identity details (name, username, email, date of birth)
- Gameplay history and bet logs
- Transaction history and payment identifiers
- Device or session data
- Account verification records
- Complaint content, attachments, and communications

14.3 Access Control and Data Security

All complaint records are:

- Stored on encrypted servers located within the EEA or approved jurisdictions
- Accessible only to authorized personnel (complaints, compliance, risk teams)
- Subject to role-based access controls and regular security audits
- Monitored for unauthorized access or modification

Access logs are retained and reviewed as part of compliance oversight.

14.4 Retention Period

Complaint records are retained for five (5) years from the date of resolution unless:

- Longer retention is required by law (e.g., for AML or financial reporting)
- A complaint has been escalated to court or regulatory action (then retained until final closure)

14.5 Sharing of Data with Third Parties

Player complaint data may be shared, only where necessary, with:

- Certified ADR providers (for escalated disputes)
- The CGA (upon request or regulatory reporting)
- Legal counsel or law enforcement (when legally mandated)

A2F B.V. never shares complaint data for marketing, profiling, or commercial purposes.

14.6 Player Rights

Players have the right to:

- Request access to their complaint file
- Request rectification of incorrect information
- Request erasure (subject to legal obligations)
- File a complaint with a data protection authority if misuse is suspected

All rights requests are reviewed within 30 days and documented by the Data Protection Officer (DPO).

15. Abuse of Complaint Procedure

While A2F B.V. encourages the use of its complaints system, misuse of the process undermines its integrity and can harm staff and other players. To prevent exploitation, the company enforces specific standards and has the right to decline cases under defined conditions.

15.1 What Constitutes Abuse

Abusive complaints include:

- Submitting false, misleading, or manipulated evidence
- Repetitive filing of complaints on the same resolved issue
- Threatening or harassing staff via complaint channels
- Using the complaints process solely to obstruct KYC/AML reviews
- Filing a complaint solely to gain promotional advantage (e.g., bonus abuse)

15.2 Response to Abuse

When a complaint is deemed abusive:

- The player is notified with reasoning and offered one opportunity to clarify or correct the issue
- If the abuse is confirmed, the complaint is rejected, and the case is closed
- Further abuse may result in restrictions placed on the player's account (e.g., chat bans, suspension)
- Severe or repeated abuse may result in reporting to the CGA or relevant legal authorities

15.3 Staff Protection

A2F B.V. operates a zero-tolerance policy toward threats, discriminatory language, or verbal harassment of its staff. Complaints accompanied by abuse will be:

- Flagged to management
- Delayed pending review
- Closed if the behavior continues after warning

Operators are entitled to protect staff from unsafe working environments—even in the context of dispute resolution.

16. Staff Training

The effectiveness of a complaints policy is only as strong as the people applying it. A2F B.V. ensures that all staff involved in customer service, compliance, and complaints handling are thoroughly trained in legal obligations, procedural expectations, and best practices.

16.1 Mandatory Training Program

All personnel assigned to handle complaints must complete a structured training program that covers:

- Complaint reception and communication protocols
- CGA and LOK regulatory expectations, including Article 5.3 requirements
- ADR referral processes and when escalation is appropriate
- Responsible Gambling indicators, triage, and sensitivity
- Data protection standards, including GDPR and confidentiality
- Record-keeping and audit trail practices
- De-escalation techniques and respectful conflict resolution

This training is required for:

- Customer support staff
- Complaints resolution team
- Risk analysts and verification officers
- Department managers

16.2 Certification and Refreshers

- All trained staff receive internal certification and must pass a knowledge check.
- Refresher training is required annually or more frequently if policies are updated or regulatory expectations change.
- Special refresher sessions are held when:
 - Complaint trends shift (e.g., surge in RG complaints)
 - Regulatory notices are issued by the CGA
 - Internal audits reveal procedural gaps

16.3 Supervision and Mentoring

Newly assigned complaints staff operate under the supervision of a Senior Complaints Officer or Compliance Manager until deemed ready for independent handling.

Staff are encouraged to escalate any unfamiliar or sensitive case (e.g., involving minors, fraud, or RG breaches) and are never penalized for asking for help. Escalation is viewed as a best practice, not a failure.

17. Policy Review and Amendments

A2F B.V. is committed to keeping this policy accurate, legally sound, and fit for purpose. Therefore, a structured review and amendment process is in place.

17.1 Review Cycle

The Player Complaints Policy is reviewed:

- Annually by the Compliance Team and Managing Director
- Immediately following any update or guidance issued by the CGA
- Following audits or adverse events (e.g., fines, player losses, complaints upheld by ADR)

The review considers:

- Internal complaint volumes and trends
- Staff feedback
- ADR recommendations
- Benchmarking against other regulated markets

17.2 Amendment Process

When updates are proposed:

- Draft changes are circulated internally for legal and operational review
- Final amendments are approved by the Director of A2F B.V.
- Updates are published publicly on the website and linked in the Terms and Conditions
- Players are notified of material changes (e.g., revised timelines, new ADR contact)

Version control is applied to all documents. Archived versions are retained for a minimum of 5 years.

18. Final Provisions

This Player Complaints Policy represents a binding and enforceable framework governing the management and resolution of all player complaints across the licensed operations of A2F B.V. It complements the Terms and Conditions, Responsible Gambling Policy, Privacy Policy, and AML/CFT Policy, and must be interpreted in conjunction with those documents.

18.1 Legal Hierarchy and Interpretation

In the event of any conflict between this policy and:

- The Terms and Conditions → the version most favorable to the player shall prevail.
- The CGA's latest directives or the LOK → those laws and requirements shall supersede.

Nothing in this document shall be construed as limiting or waiving a player's right to:

- Contact an ADR provider
- Escalate a matter to the CGA
- Seek legal advice or pursue judicial remedies in the competent courts

18.2 Accessibility

A2F B.V. guarantees:

- Free and open access to this policy without the need to create an account
- Publication in all core operating languages, with clear legal disclaimers
- Reaffirmation of complaint rights at the point of registration and within the support ecosystem

18.3 Enforceability

This policy enters into force on 15 July 2025, and is applicable to:

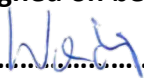
- All complaints submitted on or after that date
- All brands and websites operated by A2F B.V.
- All registered players regardless of jurisdiction, unless local law dictates otherwise

All operational staff must adhere to this policy. Violations may result in internal disciplinary procedures and reporting to the CGA.

19. Signature and Validation

This Player Complaints Policy is approved and signed by the Director of A2F B.V. and remains in force until revised or replaced in writing and with notice to players.

Signed on behalf of A2F B.V.


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Director