

LOTOSTORM B.V. (163910)
Abraham Mendez Chumaceiro Boulevard 03, Curacao



Player Complaints Policy

July 2025

Approved by the Board of Directors



GENERAL PROVISIONS

Lotostorm B.V is a legally registered entity in Curaçao that owns and operates the website <https://clickpari.com>. The company holds the license issued by the Curaçao Gaming Control Board, specifically OGL/2024/303/0300, and complies with all licensing regulations and regional restrictions established by the Curaçao regulatory authorities.

This Policy has been established to provide a clear and structured framework for receiving, handling, and resolving complaints submitted by players. It reflects Lotostorm B.V.'s ongoing commitment to maintaining the highest standards of fairness, transparency, and player protection, in alignment with the requirements outlined in Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK) and the supervisory guidelines of the Curaçao Gaming Authority (CGA).

The primary objective of this Policy is to ensure that all players have access to a reliable and efficient complaints resolution process that emphasizes impartiality and addresses concerns in a timely and fair manner. Additionally, it guarantees players the right to escalate unresolved complaints to independent and free Alternative Dispute Resolution (ADR) services, in full compliance with Curaçao's regulatory standards.

This Policy is binding on all players from the moment they register an account and engage with the gaming services provided by Lotostorm B.V. By either explicitly accepting the Policy during registration (e.g., via checkbox or pop-up confirmation) or by continuing to use the services offered under the company's license, players are deemed to have agreed to its terms.

The provisions of this Policy operate in conjunction with, and do not override, any applicable private law obligations, including but not limited to those set forth in Book 6 of the Civil Code of Curaçao regarding general terms and conditions. Nothing within this Policy limits or affects a player's rights under applicable civil law.

PROCEDURE FOR SUBMITTING COMPLAINTS

COMPLAINT TIMEFRAME

Players may submit a Complaint within six (6) calendar months of the settlement of a bet, the occurrence of the relevant incident, or the conclusion of the gaming event to which the Complaint relates. This six-month period applies uniformly across all gaming activities offered by the company, including but not limited to peer-to-peer games such as poker, ante-post fixed odds betting, and in-running sports betting.

For in-running betting markets, where outcomes depend on rapidly changing data, Players are encouraged to submit Complaints promptly. This guidance reflects the reality that certain data points are temporary in nature and may not be retained indefinitely. The company cannot reasonably be expected to preserve such transient data beyond its standard data retention policies.

SUBMITTING AN OFFICIAL COMPLAINT

To ensure fairness and consistency, all Complaints must be submitted personally by the registered Player using the official Complaint Submission Form provided by Lotostorm B.V.. This form is available through the following channels:

- As a downloadable PDF or Word document on the company's website, which can be completed and sent via email (or)
- As an interactive online form accessible and submittable directly through the Player's account dashboard.

The Complaint Submission Form requires, at a minimum, the following details:

- Full name, residential address, and Player account ID (if applicable).
- The date of the Complaint and the date of the event or decision that led to the Complaint.
- A detailed description of the issue, with supporting documentation or evidence where possible.
- Selection of the relevant Complaint category from a predefined list (e.g., deposit issues, withdrawal issues, technical failures, Responsible Gaming concerns).

Players may be requested to provide additional information or documentation reasonably necessary to allow Lotostorm B.V. to conduct a thorough and impartial investigation. Any such requests will be reasonable and proportionate to the nature and complexity of the Complaint.

OVERSIGHT ROLE OF THE CURAÇAO GAMING AUTHORITY (CGA)

Players should be aware that the Curaçao Gaming Authority (CGA) does not intervene in individual disputes between Players and licensed operators. The CGA's role is supervisory, utilizing aggregated Complaint data to monitor compliance and support its regulatory oversight functions.

However, Players retain the right to report concerns directly to the CGA in instances where they believe Lotostorm B.V. has engaged in regulatory breaches, malpractice, or violations of licensing conditions. The company must not impose any restrictions on a Player's ability to contact the CGA for these purposes.

COMPLAINT RESOLUTION PROCESS

HOW WE PRIORITIZE YOUR COMPLAINT

Lotostorm B.V. treats every Complaint seriously. Once we receive your Complaint, we carefully log and review it to determine the appropriate priority level.

Responsible Gaming Complaints—such as concerns about self-exclusion or the protection of vulnerable players—receive top priority because your well-being is our priority. We aim to resolve these cases within five (5) business days. In rare cases, if the issue is particularly complex, we may need up to two (2) additional weeks to provide a thorough response.

For all other types of Complaints, we handle them in the order they're received. Our goal is to resolve these within four (4) weeks, although especially complex cases may take up to eight (8) weeks.

WE CONFIRM YOUR COMPLAINT PROMPTLY

When you submit a Complaint, we'll acknowledge it quickly:

- Within 2 calendar days for Responsible Gaming issues
- Within 7 calendar days for all other types of Complaints

Our acknowledgment will include:

- A confirmation of receipt and a unique reference number for your case
- An overview of what to expect during the investigation
- An estimated timeline for resolution, along with transparency about any possible extensions

HOW WE INVESTIGATE AND RESOLVE COMPLAINTS

We approach every Complaint with care, diligence, and fairness. Here's what our process involves:

- A thorough review of your account, transactions, system activity, and communications
- Collaboration with relevant departments like Customer Support, Compliance, and Technical Operations
- Contacting you for any additional details we might need to fully understand and resolve your issue

Our trained Complaint Handlers ensure all investigations are conducted transparently and fairly. Once resolved, we'll provide you with:

- A clear, written explanation of our findings
- Any supporting evidence, where relevant
- Guidance on how you can escalate the matter to independent ADR services if you're not satisfied
- Contact details for the relevant ADR provider(s)

HOW WE USE AI TO HELP — WITH HUMAN OVERSIGHT

We leverage artificial intelligence (AI) tools to support some parts of the complaints process, like sorting cases and identifying patterns. Human oversight is maintained for all critical decisions. Human oversight is mandatory for:

- All Responsible Gaming Complaints
- Any complex cases or those involving sensitive personal information

Any AI-assisted decisions are reviewed to ensure fairness, accuracy, and compliance, keeping your rights fully protected.

ALTERNATIVE DISPUTE RESOLUTION (ADR)

YOUR ACCESS TO INDEPENDENT HELP

At Lotostorm B.V., we do our best to resolve every Complaint fairly and promptly. But if you're still not satisfied after we've completed our internal process, you have the right to take your case to an independent Alternative Dispute Resolution (ADR) provider.

ADR services are completely free. Lotostorm B.V. covers all costs so clients can seek a fair, impartial decision.

WHEN ADR IS THE FINAL STEP

Once an ADR provider has reviewed your case and made a decision, that's considered the end of the ADR process. Neither you nor Lotostorm B.V. can submit the same issue to another ADR provider.

However, if the ADR outcome isn't legally binding under private law, you're still free to pursue legal action through the courts if you choose.

KEEPING THE SYSTEM FAIR

To make sure the ADR process is used fairly and not misused, Lotostorm B.V. may set reasonable conditions for referrals — for example, requiring a minimum claim value.

These safeguards are there to ensure fairness, will always follow applicable laws, and are subject to oversight by our regulator.

RECORD-KEEPING AND REPORTING

At Lotostorm B.V., we take our regulatory responsibilities seriously. In line with Curaçao's gaming regulations, we maintain accurate, detailed, and securely stored records of all Player Complaints. These records include, but aren't limited to:

- Copies of all Complaint Submission Forms, whether submitted online or in hard copy
- Correspondence between you and our team throughout the complaints process
- Internal investigation reports and supporting materials like account histories, transaction logs, and technical reports
- Records of any referrals to ADR providers or legal proceedings initiated by either party

We retain these records for a minimum of five (5) years from the date your Complaint is fully resolved — unless a shorter retention period applies under data protection laws or other legal requirements. Our data retention practices are fully aligned with local regulations and global privacy standards.

REPORTING OBLIGATIONS

Beyond internal record-keeping, Lotostorm B.V. submits detailed reports to the Curaçao Gaming Authority (CGA) twice a year — on January 15th and June 15th. These reports cover all Complaints received since the last reporting period and include:

- The total number of Complaints submitted

- A breakdown of resolved Complaints, showing how many were upheld in the Player's favor and how many were rejected
- The number of Complaints still pending or unresolved
- Complaint categories (e.g., technical issues, payment delays, Responsible Gaming matters)
- The number of Complaints escalated to ADR and their outcomes
- The number and nature of cases where Players have initiated legal proceedings

The Curaçao Gaming Authority has the right to access our Complaint records at any time to carry out its supervisory duties. Lotostorm B.V. is fully committed to cooperating with the CGA and will always provide the requested information promptly and in the correct format.

TERMS AND CONDITIONS

This Complaints Policy forms an important part of Lotostorm B.V.'s Terms and Conditions and is presented to Players in a way that is always clear, visible, and easy to access.

To ensure transparency, Lotostorm B.V.:

- Publishes this Policy as a standalone document with a clearly visible link on the homepage, registration page, and within the Player account dashboard.
- Summarizes the complaints process in the Terms and Conditions, including direct links to the full Policy for easy reference.
- Requires Players to actively confirm they've read and accepted this Policy during registration, typically through a checkbox or pop-up to ensure clear, informed consent.

The Terms and Conditions also clearly outline:

- How to submit a Complaint and the expected timelines for resolution.
- Your rights to escalate unresolved Complaints to an independent ADR provider and, where appropriate, to seek legal remedies.
- A clear statement that while the Curaçao Gaming Authority (CGA) does not mediate individual disputes, it remains available for any concerns regarding potential regulatory non-compliance.

REASONS YOU MAY WISH TO SUBMIT A COMPLAINT

At Lotostorm B.V., we recognize there are many potential reasons you might wish to raise a formal Complaint. Below are some of the most common areas where issues might arise:

1. Deposit Issues

- Delays in processing deposits
- Deposits not appearing in your account
- Errors related to deposit transactions

2. Withdrawal Issues

- Unreasonable delays in processing withdrawals
- Rejected or blocked withdrawal requests
- Disputes over withdrawal eligibility

3. Bonuses & Promotions

- Disputes over bonus terms and conditions
- Concerns about the fairness of promotional offers
- Issues meeting wagering requirements

4. Account Closures or Restrictions

- Unexplained account suspensions or closures
- Unclear or unjustified account limitations

5. Game Fairness

- Suspected software malfunctions
- Disputes over game outcomes or results
- Concerns about fairness or transparency

6. Responsible Gaming Protections

- Failures to implement or respect self-exclusion requests
- Issues with cooling-off periods or player protection measures

7. KYC & Verification

- Concerns over identity checks or document requests
- Delays or disputes during the verification process

8. Data Privacy & Security

- Handling of your personal data
- Concerns over data storage, processing, or misuse

9. Technical or Software Issues

- Platform access problems
- Website or app malfunctions affecting your experience

10. Fraudulent Activities

- Suspicion of fraudulent behavior by third parties

- Concerns about platform security or integrity

11. Underage Access

- Reports of minors gaining unauthorized access to the platform

12. Licensing or Regulatory Concerns

- Suspected breaches of licensing requirements
- Alleged violations of applicable regulations

GOVERNING LAW AND JURISDICTION

This Policy is governed by and interpreted in accordance with the laws of Curaçao.

If any legal dispute arises from or relates to this Policy, and it cannot be resolved through our internal complaints process or via Alternative Dispute Resolution (ADR), such matters will fall under the exclusive jurisdiction of the courts of Curaçao.

However, this does not affect any rights you may have under applicable laws to bring legal action in your country of residence, where such rights are provided by law.

DEFINITIONS

A **Player** refers to any individual who has successfully registered an account with Lotostorm B.V., completed all mandatory identity verification and due diligence procedures, and has participated in one or more gaming activities offered via the company's licensed platform.

A **Complaint** is any written expression of dissatisfaction submitted by a Player regarding the services, decisions, conduct, or terms of Lotostorm B.V., in which the Player seeks a response or corrective action.

A **Dispute** is a Complaint that remains unresolved to the Player's satisfaction after the internal complaint handling process has been exhausted and has subsequently been escalated either to an independent third-party Alternative Dispute Resolution (ADR) entity or to a competent court of law.

Alternative Dispute Resolution (ADR) refers to a process carried out by an independent entity certified by the Curaçao Gaming Authority (CGA), aimed at providing an impartial review and resolution of unresolved Complaints between Players and Lotostorm B.V.. ADR services are provided free of charge to the Player, with all related costs covered solely by the operator.

A **Responsible Gaming Complaint** relates to any issue raised by a Player concerning the enforcement or effectiveness of responsible gambling measures, such as the availability and timely implementation of self-exclusion or cooling-off periods, or any alleged failure to protect vulnerable individuals as outlined in the company's Responsible Gaming Policy.

A **Technical Issue** refers to any malfunction, outage, or defect within the software,

hardware, or systems operated by Lotostorm B.V. that affects the Player's ability to participate in gaming activities, whether through the website, mobile applications, or other supported platforms.

Fraudulent Activity includes any act or omission carried out with the intent to deceive, defraud, or gain an unfair advantage. This includes, but is not limited to, account takeovers, the use of automated tools or bots, bonus abuse, or the submission of falsified identification documents.

The **Complaint Handler** refers to the designated employee(s) or team within Lotostorm B.V. responsible for receiving, investigating, and resolving Player Complaints in accordance with this Policy. All Complaint Handlers are trained to meet applicable regulatory standards and are required to perform their duties with impartiality.

CONTACT INFORMATION

If you need to reach **Lotostorm B.V.** regarding a Complaint, you can do so through any of the following channels:

General Enquiries

support-en@clickpari.com

Complaints

complaints@clickpari.com

Live Chat Support

Available **24/7** directly on our website.

Submit a Complaint Online

Access our official **Complaint Submission Form** here:

<https://clickpari.com>

Alternative Dispute Resolution (ADR) Contact Details

Information on ADR services can be found at:

<https://clickpari.com>

Curaçao Gaming Authority

Visit the CGA's official website:

<https://www.gamingcontrolcuracao.org/>