

NUMERETO B.V.

COMPLAINTS POLICY



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1. Introduction to the Complaints Policy

This Player Complaints Policy (“Policy”) has been formally established and issued by Numereto B.V., a private limited liability company incorporated under the laws of Curaçao. The company is registered under company number 163869 and holds the license issued by the Curaçao Gaming Control Board under license number OGL/2024/315/0489.

The purpose of this Policy is to provide a clear and structured framework for receiving, managing, and resolving Complaints submitted by Players. It demonstrates Numereto B.V.’s commitment to upholding high standards of fairness, transparency, and player protection. All procedures outlined in this Policy fully comply with the requirements of Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de Kansspelen, LOK) and follow the supervisory guidance issued by the Curaçao Gaming Authority (CGA).

This Policy ensures that Players have access to an effective and impartial mechanism for resolving Complaints. It sets out processes designed to address Player concerns promptly and fairly. Furthermore, it affirms the Player’s right to escalate unresolved matters to an independent Alternative Dispute Resolution (ADR) service at no cost, in line with Curaçao’s regulatory requirements.

The provisions of this Policy apply to all Players from the moment they register an account and use Numereto B.V.’s gaming services. By completing the registration process—whether through explicit acknowledgment, such as ticking a checkbox, or by continuing to use the services—Players confirm their acceptance of the terms of this Policy.

This Policy is intended to complement existing private law obligations and operate in harmony with applicable legal frameworks, including the provisions of Book 6 of the Civil Code of Curaçao concerning general terms and conditions. It shall not be interpreted as restricting or overriding any rights provided to Players under civil law.

2. Submitting a Complaint

2.1. Timeframe for Filing a Complaint

Players of Numereto B.V. may submit a Complaint within six calendar months from the date a bet was settled, the occurrence of the relevant incident, or the conclusion of the gaming event to which the Complaint relates. This timeframe applies uniformly across all services provided by the company, including peer-to-peer games such as poker, ante-post fixed odds betting, and in-play sports markets.

For in-play betting, where outcomes are dependent on rapidly changing data, Players are strongly encouraged to raise their Complaints as soon as possible. Given the dynamic nature of such data, it may not remain available indefinitely.

Numereto B.V. cannot be expected to retain this information beyond its standard data retention periods.

2.2. How to Submit a Complaint

To maintain fairness and consistency in its complaint handling process, only registered Players are permitted to submit Complaints. Players must use the official Complaint Submission Form provided by Numereto B.V., which is available in the following formats:

- A downloadable PDF or Word document accessible on the company's website, which can be completed and returned via email (or)
- An online interactive form that can be completed and submitted directly through the Player's account dashboard.

The Complaint Submission Form requires Players to provide key information, including:

- Full legal name, residential address, and Player account identifier where applicable.
- The date of submission and the date of the event or decision prompting the Complaint.
- A detailed description of the issue, supported by relevant documents or evidence where possible.
- The category of Complaint, chosen from a predefined list such as deposit issues, withdrawal delays, technical problems, or Responsible Gaming concerns.

Players should be aware that Numereto B.V. may request additional information or documentation if necessary to conduct a thorough and fair investigation. Such requests will remain proportionate to the complexity and nature of the Complaint.

2.3. Oversight Role of the Curaçao Gaming Authority (CGA)

Players should understand that the Curaçao Gaming Authority (CGA) does not mediate individual disputes between Players and licensed operators. The CGA's primary role is regulatory and supervisory, using aggregated complaint data to monitor operator compliance and to support its enforcement actions.

Nevertheless, Players retain the right to contact the CGA directly if they believe Numereto B.V. has breached its licensing obligations or violated Curaçao's regulatory framework. The company will not place any restrictions on a Player's ability to report such concerns to the regulator.

3. Resolution Process

3.1. Prioritisation

All Complaints received by DOUBLED B.V. are recorded systematically and reviewed to assess their priority. Complaints that involve Responsible Gaming issues, including but not limited to failures in applying self-exclusion measures or concerns about the targeting of vulnerable players, are given priority due to their potential impact on player well-being.

For such Responsible Gaming Complaints, the company strives to provide a final response within five business days. In exceptional circumstances, where the complexity of the matter or external factors require more time, this period may be extended by no more than two additional weeks.

Other categories of Complaints are processed in the order they are received. The target resolution period for these is four weeks. If additional time is necessary due to the complexity or evidentiary requirements of a particular case, the company may extend the period once by up to four more weeks, with prior notification provided to the Player.

3.2. Confirmation of Receipt

When a Complaint is received, DOUBLED B.V. provides a formal acknowledgment in writing within the following timeframes:

- Within two calendar days for Complaints relating to Responsible Gaming issues.
- Within seven calendar days for all other types of Complaints.

This acknowledgment will include:

1. Confirmation that the Complaint has been received and the assignment of a unique reference number for tracking purposes.
2. A clear outline of the steps that will be taken during the investigation and resolution process.

3. Information about the expected timeframe for resolution, including any potential for extensions and the reasons they may be required.

3.3. Investigation and Resolution

Each Complaint is investigated thoroughly and with impartiality. The investigation process includes:

- A review of relevant account information, transaction logs, system records, and communication history.
- Collaboration with internal departments such as Customer Support, Compliance, and Technical Operations to ensure all aspects of the Complaint are fully understood.
- Requests for additional information or documentation from the Player if this is necessary to resolve the matter.

The designated Complaint Handler ensures that the investigation is conducted diligently and transparently. Upon completion, the Player will receive:

1. A detailed written explanation of the outcome, supported by relevant evidence where applicable.
2. Clear guidance on the Player's right to escalate the matter to an Alternative Dispute Resolution (ADR) provider if they remain dissatisfied.
3. Contact details for the ADR provider(s) engaged by DOUBLED B.V..

3.4. Artificial Intelligence

DOUBLED B.V. may use artificial intelligence tools to support certain aspects of the Complaint management process, such as sorting cases or identifying patterns. However, human oversight is mandatory in specific instances, including:

- Complaints that involve Responsible Gaming issues.
- Complaints considered complex or those that include sensitive personal or financial information.

Any resolution that involves AI assistance is carefully reviewed to ensure that the outcome is fair, accurate, and consistent with regulatory requirements and the protection of Player rights.

4. Alternative Dispute Resolution (ADR)

If a Player is not satisfied with the outcome after completing Numereto B.V.'s internal complaints process, they may escalate their Complaint to an independent Alternative Dispute Resolution (ADR) provider. ADR services are provided to Players at no cost. All expenses related to the ADR process are fully covered by Numereto B.V. in accordance with its licensing obligations and regulatory requirements.

4.1. Finality of ADR Decisions

Once an ADR process is completed and a decision is issued by the appointed ADR provider, neither the Player nor Numereto B.V. may bring the same matter before another ADR entity. However, Players still have the right to seek additional legal remedies through the courts or other competent legal channels where ADR determinations are not binding under private law.

4.2. Safeguards Against Misuse of ADR

To protect the integrity of the ADR process, Numereto B.V. may consult with its legal advisors to establish reasonable measures for ADR referrals. These may include setting minimum claim thresholds or criteria to prevent misuse of the service. Any such measures will remain fair, proportionate, and fully compliant with civil legislation and are subject to oversight by the Curaçao Gaming Authority.

5. Record-Keeping and Reporting Obligations

Numereto B.V. acknowledges its regulatory responsibility to maintain complete, accurate, and securely stored records of all Complaints submitted by Players. These records are essential for promoting transparency, accountability, and compliance with oversight requirements. Records maintained include, but are not limited to:

- Copies of all Complaint Submission Forms, whether submitted online or in hard copy.
- All correspondence between the Player and Numereto B.V.'s representatives throughout the complaint process.
- Internal investigation reports and supporting documents such as account histories, transaction records, and technical evaluations.
- Records of any referrals or escalations to ADR providers and any legal actions initiated by either party.

These records will be retained for no less than five years from the date of the final resolution of the Complaint, unless shorter retention periods are mandated by data

protection laws, statutes of limitation, or other applicable legal provisions. Numereto B.V. ensures its data retention practices are fully compliant with Curaçao's regulatory and privacy requirements.

5.1. Reporting to the Regulator

In addition to maintaining internal records, Numereto B.V. is required to submit biannual reports to the Curaçao Gaming Authority (CGA). These reports, due by January 15th and June 15th each year, must include:

- The total number of Complaints submitted during the reporting period.
- A breakdown of Complaints resolved, specifying those upheld in favor of the Player and those rejected.
- The number of Complaints pending or unresolved as of the reporting date.
- Categorization of Complaints by type, such as technical problems, payment issues, or Responsible Gaming concerns.
- The number of Complaints escalated to ADR and the outcomes of these referrals.
- Details of any legal proceedings initiated by Players against the company.

The CGA reserves the right to request access to Complaint records at any time as part of its supervisory duties. Numereto B.V. will fully cooperate with such requests, ensuring all information is provided promptly and in the required format.

6. Integration of the Complaints Policy into Terms and Conditions

This Complaints Policy is considered a core part of the Terms and Conditions of Numereto B.V. and is made accessible to Players in a clear and transparent manner.

To ensure ease of access and visibility, Numereto B.V. has implemented the following measures:

- The complete Complaints Policy is published as a standalone document, accessible through a prominent link on the company's homepage, the registration page, and within the Player account dashboard.
- A concise summary of the complaints procedure is included in the Terms and Conditions, accompanied by direct hyperlinks leading to the full Policy text.

- During the account registration process, Players must acknowledge and accept the Complaints Policy. This is facilitated through user-friendly mechanisms, such as a mandatory checkbox or a pop-up window, ensuring informed consent prior to account creation.

The Terms and Conditions also include:

- A detailed explanation of how to lodge a Complaint, along with applicable timelines for acknowledgment and resolution.
- Clear information regarding the Player's right to escalate unresolved Complaints to an independent Alternative Dispute Resolution (ADR) provider and to pursue legal remedies where permitted under the law.
- A statement clarifying that the Curaçao Gaming Authority (CGA) does not mediate individual disputes but may be contacted by Players if regulatory breaches or non-compliance by the operator are suspected.

7. Types of Issues Eligible for Complaints

Players of Numereto B.V. are entitled to submit a Complaint regarding any aspect of their engagement with the company's gaming and betting services. The following list, while not exhaustive, provides examples of common issues for which a Complaint may be lodged:

- Deposit-related problems, including delays, failed transactions, or errors in crediting funds to Player accounts.
- Withdrawal disputes, such as delays in processing, rejections of requests, or partial payments.
- Concerns about the fairness, clarity, or application of promotional offers, bonuses, or their associated terms and conditions.
- Allegations of unjustified account suspensions, closures, or restrictions that limit account functionality or access.
- Complaints about game fairness, including software errors, system malfunctions, or outcomes perceived as unfair.
- Responsible Gaming issues, such as failures to implement or honor self-exclusion requests, cooling-off periods, or other protective measures.

- Challenges during Know Your Customer (KYC) or verification procedures, including delays or repeated document requests.
- Data protection and privacy concerns regarding the collection, use, or safeguarding of personal information.
- Technical malfunctions or platform issues that hinder access or usability of gaming services.
- Allegations of fraudulent activity by third parties or the operator.
- Reports of underage individuals accessing the gaming platform.
- Suspected breaches of licensing conditions or non-compliance with Curaçao's regulatory requirements.

Players are encouraged to provide as much detail as possible, along with supporting documentation, when submitting a Complaint. This helps Numereto B.V. to investigate promptly and effectively.

8. Applicable Law and Jurisdiction

This Complaints Policy is governed by, and shall be interpreted in accordance with, the laws of Curaçao. Any legal proceedings arising from or in connection with this Policy, which are not resolved through the internal complaints process or by Alternative Dispute Resolution (ADR), will fall under the exclusive jurisdiction of the competent courts of Curaçao. This does not affect the rights of Players to initiate legal proceedings in their country of residence where such rights are provided under applicable local laws.

9. Definitions

For the purposes of this Player Complaints Policy, the following terms are defined as follows:

Player

A Player means any natural person who has successfully registered an account with Numereto B.V., completed all mandatory identity verification and customer due diligence requirements in accordance with regulatory standards, and participated in one or more gaming or betting activities offered through the company's licensed platform.

Complaint

A Complaint refers to any written communication submitted by a Player that expresses dissatisfaction with any aspect of Numereto B.V.'s services, operations,

decisions, or contractual terms, and for which the Player seeks a response, clarification, or corrective action.

Dispute

A Dispute arises when a Complaint remains unresolved to the Player's satisfaction following the completion of Numereto B.V.'s internal complaint process and has been escalated to either an independent Alternative Dispute Resolution (ADR) provider or, where applicable, a competent court of law.

Alternative Dispute Resolution (ADR)

Alternative Dispute Resolution (ADR) refers to an impartial process conducted by an independent entity certified by the Curaçao Gaming Authority (CGA) to review and resolve Complaints that remain unresolved between Players and Numereto B.V. ADR services are provided to Players free of charge, with all costs borne entirely by the company.

Responsible Gaming Complaint

A Responsible Gaming Complaint includes any issue raised by a Player concerning the application, enforcement, or effectiveness of responsible gambling measures. This may involve delays in activating self-exclusion or cooling-off periods or any perceived failure to protect vulnerable individuals as outlined in Numereto B.V.'s Responsible Gaming Policy.

Technical Issue

A Technical Issue means any fault, malfunction, or disruption in the software, hardware, or systems operated by Numereto B.V. that affects a Player's ability to access or participate in gaming activities across desktop, mobile, or other supported platforms.

Fraudulent Activity

Fraudulent Activity encompasses any act, omission, or scheme intended to mislead, defraud, or gain an unfair advantage within the context of Numereto B.V.'s gaming services. This includes unauthorized account access, misuse of automated systems or bots, bonus abuse, or submission of falsified documents for identity verification.

Complaint Handler

The Complaint Handler refers to the designated personnel or team within Numereto B.V. responsible for receiving, investigating, and resolving Player Complaints in line with this Policy. Complaint Handlers are trained in relevant regulatory requirements and are expected to operate with impartiality, fairness, and professionalism throughout the process.

10. Contact Information

Players who wish to submit a Complaint or request additional information may contact Numereto B.V. using any of the following channels:

- General Enquiries: support-en@rolsbet.com
- Complaints Department: complaints@rolsbet.com
- Live Chat Support: Available 24/7 via <https://rolsbet.com/>
- Complaint Submission Form: Accessible at <https://rolsbet.com/>
- Alternative Dispute Resolution (ADR): Information available at <https://rolsbet.com/>
- Curaçao Gaming Authority: <https://www.gamingcontrolcuracao.org>