

Complaints Policy

Version Control

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1. Introduction

livebetline.com (the “website”) is owned and operated by **Complex Technologies B.V.**, a company registered under the laws of **Curaçao** (registration number: 153939) with its registered address at **Abraham Mendez Chamicuro Boulevard 03, Curaçao, P.O. Box 4750**, and licensed under **Curaçao Gaming License No.: OGL/2024/334/0243** (the “Company”).

livebetline.com is committed to providing all players with a **safe, transparent, and enjoyable gaming environment**. In accordance with our legal obligations under **Article 5.3 of the National Ordinance on Games of Chance (N.G. 2024, no. 157)**, the Company is dedicated to maintaining a structured process for the **resolution of player complaints and disputes**.

The Company acknowledges that issues may occasionally arise and takes every player’s complaint **seriously, impartially, and with due diligence**. Therefore, **Complex Technologies B.V.** has adopted this **Complaints Policy** to ensure that the complaint-handling procedure is **transparent, fair, and accessible** for all players.

1.1. Purpose and Scope

This Complaints policy sets out the process for the submission, handling and resolution of player complaints in a fair, transparent and timely manner. It also specifies the official channels through which complaints may be submitted to **livebetline.com**, as well as the procedures for managing and resolving complaints and disputes.

This policy applies to:

- All players with registered accounts on **livebetline.com**;
- All employees or representatives involved in customer support and the complaint handling process.

2. Definitions

For the sake of clarity and consistency, the Company considers it essential to provide definitions of certain key terms used throughout this policy.

Company: Refers to **livebetline.com**, including its employees, agents, and authorized representatives.

Player: An individual who holds a registered account with **livebetline.com**.

Complaint: A written expression of dissatisfaction by a player relating to the Company’s services, decisions, terms or conduct, which indicates that the player is unhappy and expects a response or resolution. In order to comply with regulatory reporting requirements a complaint is further regarded as when a complaint has been submitted through the complaint submission form by the player and or a complaint has been escalated to Alternative Dispute Resolution.

Dispute: A complaint that has not been resolved to player’s satisfaction and has been escalated internally either within the Company or to an independent third-party (e.g. Alternative Dispute Resolution (ADR) provider or the court of law).

Responsible Gaming Complaint: Any issue concerning responsible gambling measures such as self-exclusion, deposit limits, or safeguarding vulnerable players.

Technical Issue: Any malfunction, outage, or defect in the Company's systems affecting gameplay.

Fraudulent Activity: Any attempt to deceive or gain unfair advantage, such as account takeover, use of bots, or bonus abuse.

Complaint categorization: A complaint may be classified or fall in the following categories:

#	Category	Description
1	Deposit Issues	Difficulties or delays in funding a Player's account.
2	Withdrawal Issues	Delays, errors, or restrictions when withdrawing funds.
3	Bonus Terms and Conditions	Concerns regarding eligibility, application, or interpretation of bonus offers.
4	Account Closures or Restrictions	Queries or disputes related to account suspensions, closures, or imposed limitations.
5	Alleged Errors or Unfairness in Game Outcomes	Claims of incorrect results or perceived bias during gameplay.
6	Responsible Gaming Issues	Complaints about responsible gaming tools, such as self-exclusion, deposit limits, and their implementation.
7	Treatment of Player Balances	Concerns about the management, crediting, or deduction of Player funds.
8	Know Your Customer (KYC) and Verification	Issues arising during identity verification or account approval processes.
9	Data Protection	Concerns regarding the confidentiality, storage, or handling of personal information.
10	Technical or Software Issues	Problems arising from platform malfunctions or software errors.
11	Anti-Money Laundering (AML) Concerns	Reports or issues related to the Company's AML procedures.
12	Issues with Minors	Concerns about underage access or participation.
13	Fraudulent Games	Allegations of manipulation, cheating, or unfair practices in the games offered.
14	Fraudulent Practices	Concerns about suspected dishonest conduct by the Company, employees, or other Players.
15	License or Regulation	Complaints related to the Company's compliance with licensing requirements and regulatory obligations.

#	Category	Description
16	Unfair Terms and Conditions	Complaints regarding unclear, misleading, or inequitable terms and conditions applied by the Company.

This above list provides examples of common complaint categories and is not exhaustive. Players are welcome to submit complaints regarding any aspect of their relationship with the Company or any incident related to their participation on the website, including game payouts, outcomes and other material terms of the betting arrangement as well as to declare such arrangements unconcluded or void, free of charge. Each complaint will be appropriately classified during the complaint handling process.

3. Conditions For Filing a Complaint

Registered player: Complaints may only be submitted by registered players with verified accounts with the Company.

Personal Complaints: A complaint must be submitted directly by the player. Complaints submitted by third parties on behalf of a player will not be accepted.

Timeframe Complaint Submission: A player must submit a complaint to the Company within six (6) months from the date of the incident giving rise to the complaint, or from the date of settlement of the relevant bet.

However, the Company strongly advises that all complaints be submitted as soon as the player becomes aware of any incident, including a potential violation of the player's rights, in order to avoid the loss of sensitive data. All bet calculation claims for Cyber-Live games are accepted within seventy-two (72) hours from the moment that the game has concluded.

4. Submitting a Complaint

All players must submit their complaints to the Company through one of the following channels:

Website form: A designated complaint form can be found through the seal on the website at: **(insert a link to Complaint Form here)**. The player is required to fill out this form accurately. The Complaint Form will include: full name, residential address and country, account number, date of complaint, date of incident, description, and supporting documents as further outlined in paragraph 4.1.

Email: In addition to the website form, complaints may also be submitted by email to: complaints@livebetline.com. Upon receipt, an official complaint form will then be sent to the player for completion.

4.1. Information to be Submitted

To enable the Company to handle complaints fairly, efficiently, and in accordance with the Curacao Gaming Authority (CGA) guidelines, players submitting a complaint via the website Complaint Form or by email are required to provide the following information:

1. Full Name, Residential Address, and Country of Residence of the Player

- ❖ (This information is mandatory and must be included in the Complaint Form as per CGA requirements.)
- 2. Player Account Number or Username (*if applicable*)
 - ❖ The Company must include this field on the form if applicable, in accordance with CGA guidelines.
- 3. Date of the Complaint and Date of the Disputed Incident or Event
 - ❖ Both dates are required to ensure proper tracking and investigation of the complaint.
- 4. Detailed Description of the Issue or Conduct Being Disputed
 - ❖ Players may select from pre-determined categories provided by the Company or provide a free-text description.
 - ❖ This information is mandatory for the Company to assess the complaint in accordance with CGA guidelines.
- 5. Supporting Documents or Evidence
 - ❖ Players are encouraged to provide any relevant documentation, including but not limited to: screenshots, videos, transaction IDs, or correspondence.
 - ❖ While not explicitly required by CGA, submission of supporting evidence is strongly recommended to facilitate the resolution process.
- 6. Preferred Method of Contact and Response Language (*optional but recommended*)
 - ❖ Players may specify their preferred method of communication and language for responses, to ensure timely and clear communication.
- 7. Consent to Processing Personal Information
 - ❖ By submitting a complaint, the player consents to the Company processing their personal information for the purpose of investigating and resolving the complaint.
 - ❖ Processing will comply with applicable data protection laws and the Company's Privacy Policy.
- 8. Acknowledgment of Complaint Procedure (*optional but recommended*)
 - ❖ Players acknowledge that the Company may take a reasonable period to investigate the complaint and will respond in accordance with the Company's complaint handling policy.

4.2. Complaint Handling Process

1. Acknowledgement

- ❖ Once the complaint is received by the Company, the Company will promptly confirm the receipt of the complaint via email, however no later than within seven (7) days.
- ❖ An explanation of the complaint handling process will be provided to the player as well as the expected timeline for complaint resolution.
- ❖ Additionally, a complaint reference number for tracking purposes will also be included.

2. Assessment

- ❖ The Company's Customer's Support team will review, assess and investigate the submitted complaint.
- ❖ During this process, the Company reserves the right to request additional information or documents if needed to fully understand and address the complaint.

3. Resolution Timeline

- ❖ Within an initial period of four (4) weeks, the Customer's Support team will conduct its investigation and provide a response to the player.

- ❖ If more time is needed, the Company may extend this period for an additional four (4) weeks.
- ❖ Prior to proceeding with an extension, the player will be duly notified at least one (1) week before expiration of the first period.

4. Resolution

- ❖ After completing the assessment of the complaint, a final decision or response, based on the Company's findings, will be provided to the player in writing through email.

The Company's final decision or response will be one of the following:

1. A clear and substantiated resolution on the complaint, supported by evidence and information on ADR escalation.
2. A clear and substantiated explanation for declining to handle the Complaint or on why the complaint cannot be addressed and information on ADR escalation.

4.2.1. Responsible Gaming Complaints

The Company is committed to promoting responsible gaming and protecting players from gambling-related harm. Complaints related to responsible gaming concerns, are prioritized and are handled promptly. The Company, thus, employs the following complaint handling procedure regarding such complaints.

1. Acknowledgement

- ❖ Once the complaint is received by the Company, the Company will do its best to confirm the receipt of the complaint via email, within two (2) days.
- ❖ An explanation of the complaint handling process will be provided to the player as well as the expected timeline for complaint resolution.
- ❖ Additionally, a complaint reference number for tracking purposes will also be included.

2. Assessment

- ❖ The Company's Customer's Support team will review, assess and investigate the submitted complaint.
- ❖ During this process, the Company reserves the right to request additional information or documents if needed to fully understand and address the complaint.

3. Resolution Timeline

- ❖ Within an initial period of five (5) days, the Customer's Support team will conduct its investigation and provide a response to the player.
- ❖ If more time is needed for the Company to provide a response, the Company may extend this period for a maximum of two (2) weeks.
- ❖ The player will be duly notified of the delay in providing a response.

4. Resolution

- ❖ After completing the assessment, the Company will provide the player with a final decision or response in writing via email. This decision will be based on the Company's findings and will

take into account the player's requested resolution (e.g. self-exclusion, time limits, or temporary account freeze).

5. Escalation

In the event that a player is not satisfied with the final resolution provided by the Company, the player has the right to escalate their dispute further and seek resolve through the following channels:

1. Alternative Dispute Resolution;
2. Legal action through the court of law.

5.1. Alternative Dispute Resolution

The Company is obliged to offer Alternative Dispute Resolution (ADR) to players as an option to resolve their disputes. On a short-term basis, the Company intends to fully comply in offering the possibility of ADR by an independent third party approved by the Curaçao Gaming Authority.

Once implemented, the decisions of the appointed ADR provider will be binding on both parties. Neither party may restart the process with another ADR provider in respect of the same dispute. To safeguard against abuse of the ADR process, the Company reserves the right to apply reasonable conditions, such as minimum claim thresholds of claims that may be escalated to ADR.

5.2. Legal Action

Bittech is committed to resolving all player complaints internally, fairly, and to mutual satisfaction. However, the Company recognizes and fully respect each player's legal rights. Each player retains the right to pursue legal action through the court system if they are not satisfied with the final resolution of the complaint process. If a player chooses this option, the Company will fully cooperate with the legal proceedings and provide any necessary information to support the process.

6. Escalation to Curaçao Gaming Authority

As a licensed operator under the laws of Curaçao, the Company is subject to the supervision of the Curaçao Gaming Authority (CGA). The CGA will not mediate on or resolve individual player complaints regarding gambling-related transactions on the Company's website. However, players may submit their complaints or concerns to CGA at complaints@cga.cw if they believe the Company has breached for example, applicable regulations or license conditions.

7. Terms & Conditions Integration

This Policy is integrated into the Terms & Conditions. Players are explicitly required to acknowledge and accept the Policy, (by way of a tick-box or pop-up) during registration. The Policy is accessible via the homepage, registration page, and player dashboard.

8. Record Keeping

The Company records all complaints regardless of the channel through which they have been submitted, in a centralized system to ensure efficient handling and regulatory compliance.

The following information will be recorded for each complaint:

- **Complaint Reference Number** (as issued upon acknowledgment)
- **Date of Complaint Submission**
- **Player Information** (Full name, player account number or username, residential address, email)
- **Categorization of Complaint** (Deposit Issues, Responsible Gaming Issues, Unfairness in Game Outcomes etc.)
- **Complaints Details** (description of the issue and any supporting evidence such as screenshots, logs, or documents)
- **Resolution** (actions taken, date resolved, and confirmation of communication to the player)

The recording data will be securely stored for five (5) years.

9. Regulatory Reporting

In accordance with the LOK, the Company will submit complaints reports to the CGA twice a year, on January 15th and June 15th respectively. This complaints report shall include:

1. Total number of complaints received;
2. Total number of settled complaints (upheld and rejected);
3. Number of pending or unresolved complaints;
4. Number of complaints by category;
5. Number referred to ADR and the subsequent outcome of each;
6. Number and detail of complaints for which the player has taken legal action.

10. Governing Law & Jurisdiction

This Policy is governed by the laws of Curaçao. Disputes shall be subject to the exclusive jurisdiction of the courts of Curaçao.

11. Contact Information

General Enquiries: support@ **livebetline.com**

Complaints: complaint@**livebetline.com**

Live Chat: Available 24/7 via the website

Complaint Form: [insert link]

ADR Provider: [insert contact]

Curaçao Gaming Authority: complaints@cga.cw

12. Policy Review

This policy will be reviewed at least annually, or earlier if necessary, and amended as required in response to regulatory changes, operational needs, or feedback from players and stakeholders.