

COMPLAINTS POLICY

REVISION HISTORY

Version Number	Date	Summary of changes	Author
1.0	01/07/2025	New policy drafted	Edward Mackrill
1.1	20/01/2026	Updated following feedback from CGA	Edward Mackrill

PURPOSE

This Player Complaints Policy sets out the procedures by which Luminect Limited B.V. (“the Company”) receives, processes, investigates and resolves player complaints in a fair, transparent and timely manner, in accordance with Article 5.3 of the National Ordinance for Games of Chance (LOK) and Curaçao Gaming Authority (“CGA”) regulatory requirements.

This policy is designed to ensure that all players have access to a clear, accessible and effective complaint resolution process, including free independent Alternative Dispute Resolution (ADR) services.

DEFINITIONS

Player Interaction

Any written communication initiated by a player directed to customer support, including enquiries, feedback and information requests.

Complaint

A written expression of dissatisfaction relating to the Company’s services, decisions, products, terms or conduct where the player expects a response or resolution.

Dispute

A complaint that remains unresolved after completion of the internal complaint process and is escalated to ADR or legal proceedings.

COMPLAINT ELIGIBILITY WINDOW

Players may submit a complaint free of charge within six (6) months of the settlement of the bet or occurrence of the relevant incident.

For peer-to-peer games or ante-post betting, the six-month period begins from event settlement rather than wager placement.

For in-running sports betting disputes, players are advised that while complaints may be submitted within six (6) months, certain event-specific data may only be available for a limited period and timely submission is therefore encouraged.

This policy applies from the date the Company was issued its Curaçao Gaming Authority licence or dynamic seal under the LOK framework.

HOW TO SUBMIT A COMPLAINT

Initial Contact

Players are encouraged to first contact Customer Support via:

- Live Chat
- Email
- Support Ticket System

If the issue is not resolved, players may submit a formal complaint.

Submitting a complaint to the Company is free of charge.

FORMAL COMPLAINT SUBMISSION FORM

The Company provides an official **Complaint Submission Form** which can be completed online or downloaded and submitted electronically.

The form includes at minimum:

- Full name
- Residential address and country of residence
- Registered account username or ID
- Date of complaint

- Date of disputed event
- Description of the complaint (including selectable complaint categories)
- Supporting documentation (where applicable)

The form is available in English and in the primary language of the website used by the player.

Only registered account holders may submit complaints.

COMPLAINT RESOLUTION PROCESS

Responsible Gambling Complaints

Complaints relating to responsible gambling matters (including self-exclusion, vulnerable player protection, cooling-off periods, or affordability concerns) are prioritised.

Timeline:

- Written acknowledgement within **2 business days**
- Best effort resolution within **5 business days**
- If additional time is required:
 - Extension up to **2 weeks**, with written notice
 - Maximum additional extension of **2 further weeks** if justified

Once classified as responsible gambling related, communication will be handled by trained human staff (not automated systems).

All Other Complaints

Timeline:

- Written acknowledgement within **7 days**
- Resolution within **4 weeks**
- If required due to complexity or missing information:
 - One extension up to **4 additional weeks**
 - Player will be notified in writing of the delay

Final Response

All complaints receive a written final determination including:

- Outcome of the complaint

- Reasoned explanation
- Evidence or references where applicable
- Information on escalation rights to ADR

If a complaint cannot be processed due to missing required information, the Company will notify the player and allow reasonable opportunity to provide the information.

ALTERNATIVE DISPUTE RESOLUTION (ADR)

If a complaint is not resolved internally, players may escalate the dispute to an independent ADR provider certified by the Curaçao Gaming Authority.

ADR Key Principles:

- ADR services are **free of charge to the player**
- The Company bears all ADR costs
- Only one ADR process may be used per dispute
- Once ADR is concluded, the same dispute cannot be re-submitted to another ADR provider

ADR provider contact details and procedures are published in the Company's Terms and Conditions and on the website.

The legal effect of ADR outcomes will be clearly explained to players before the ADR process begins.

Except where otherwise agreed under the specific terms of the ADR process, the Company does not restrict the player's right to pursue legal remedies through competent courts.

ROLE OF THE CURAÇAO GAMING AUTHORITY (CGA)

The Curaçao Gaming Authority (CGA) does not mediate, resolve, review or overturn individual player complaints or gambling transaction outcomes. Decisions made by the Company and/or an ADR provider are not subject to review by the CGA.

However, players may contact the CGA directly regarding:

- Regulatory breaches
- Licence condition violations
- Whistleblowing concerns

The CGA may use complaint data for supervisory and enforcement purposes.

RECORD KEEPING AND REGULATORY REPORTING

The Company:

- Maintains a complaints register
- Retains complaint and dispute records for **five (5) years** or statutory minimum periods
- Submits biannual complaint reports to the CGA on:
 - **15 January**
 - **15 June**

Reports include complaint volumes, categories, ADR referrals and legal escalations. Where no complaints have been received during a reporting period, a nil return will be submitted.

PUBLICATION AND ACCESSIBILITY

This policy:

- Is publicly available on the Company's website and accessible via a clear link from the homepage and/or registration page
- Is referenced within the Terms and Conditions
- Is accessible prior to account registration

POLICY REVIEW

This policy is reviewed annually or following regulatory changes and updated where required.