

DRAFT Player Complaints Policy

Version 1.0 - FarUp Entertainment

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1. Policy Overview

This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process. Farup Entertainment is committed to adhering to this policy, as required by our licensing agreement.

This policy ensures that players have access to a straightforward and effective dispute resolution process, including access to alternative dispute resolution (ADR) services.

2. Procedure for Complaints

2.1 Submitting a Complaint

- Any player may submit a complaint regarding any aspect of their relationship with Farup Entertainment, including, but not limited to:
 - Deposit issues
 - Withdrawal issues
 - Bonus terms and conditions
 - Account closures or restrictions
 - Alleged errors or unfairness in game outcomes
 - Responsible gaming issues
 - Treatment of player balances
 - KYC and Verification
 - Data Protection
 - Technical or Software issues
 - AML concerns
 - Issues with minors
 - Fraudulent games
 - Fraudulent practices
 - License or regulation
- Complaints must be submitted within six (6) months of the date of the incident. For complaints related to a specific game, the six-month period begins after the resolution of that game.
- Complaints must be submitted using the designated complaints template, which is readily available and referenced in the Terms and Conditions.
- The complaint form must include the following information:
 - Complainant's full name, address, and country of residence.
 - Complainant's email address (which the player account was registered with).
 - Date of the complaint.
 - A clear and detailed description of the issue, including relevant dates, times, and game details (if applicable).
 - Any supporting documentation (e.g., transaction records, screenshots, correspondence).
- A complaint can be submitted and will be handled in English or in the language of the target market.

2.2 Complaint form

Full name:

Address:

Country of residence:

Date of when the incident occurred:

Date of complaint:

Clear and detailed description of the issue, including relevant time stamps and game details (if applicable):

Supporting documentation:

2.2 Complaint Resolution

- The casino operator will acknowledge the receipt of a complaint within seven (7) days. Within 7 days the player will receive a confirmation of receipt of their complaint via email, an explanation of how their complaint will be processed and an expected resolution time frame.
- Farup Entertainment will assess and respond to complaints within four (4) weeks. If the complaint is complex or requires additional information, this period may be extended once by an additional four (4) weeks. The player will be notified in writing of any extension and the reasons for it.
- If the complaint is related to Responsible Gaming issues, the complaint will be prioritised and handled within five (5) business days. If due to the complexity of the case, more time than 5 business days is required, the player will be duly informed about the reason for the delay and will receive an answer to their complaint within two (2) weeks.
- The player will receive a final determination of their complaint in writing. The response will include:
 1. A reasoned final assessment of the outcome/resolution of the complaint, with supporting evidence if necessary; or
 2. Detailed reasons for not handling the complaint. If additional information is required, Farup Entertainment must request this information within the initial four-week period. If the player does not provide the necessary information within 4 weeks of the request, Farup Entertainment may reject the complaint.

2.3 Alternative Dispute Resolution (ADR)

- If Farup Entertainment is unable to resolve a complaint to the player's satisfaction, the player may escalate the matter to an independent ADR entity.
- Farup Entertainment has an agreement with at least one CGA-certified ADR entity.
- Players may escalate the matter to the ADR provider, free of charge. Farup Entertainment will bear all costs of the ADR process.

- The ADR entity will:
 - Provide expertise and ensure an independent, impartial, fair, and transparent process.
 - Offer dispute resolution methods such as mediation or adjudication.
 - Clarify information provided by both parties, without conducting independent investigations.
 - Make a decision based on the evidence provided, which is binding on Farup Entertainment, but does not supersede a player's right to take a dispute to court.
- The ADR provider will:
 - Acknowledge the player's initial contact within three working days.
 - Inform Farup Entertainment of the initiation of the ADR process.
 - Provide updates to both parties at least every 30 days.
 - Provide a summary of the dispute and the decision, including the legal basis.
- If Farup Entertainment does not engage with the ADR process or fails to supply requested information, the ADR provider will make a decision based on the available evidence, which may be in favor of the player. Farup Entertainment's non-cooperation will be reported to the CGA.
- Contact information for the ADR provider will be included in all complaint communications and in the Terms and Conditions on the Farup Entertainment website.
- Players have the right to choose whether or not to use ADR.

2.4 Escalation to the Curaçao Gaming Authority (CGA)

- The CGA will not resolve complaints regarding gambling-related transactions, which is clearly stated in the terms and conditions.
- If a player believes that Farup Entertainment is in breach of regulations, they may contact the Curaçao Gaming Authority (CGA) directly through the online form on the CGA website.

3. Player Support and Reporting

3.1 Contact Points

Players may submit complaints via email directly to customer support who will delegate the complaint to the responsible team. For the player, submitting a complaint is completely free of charge. A player may use the available complaint format which must include:

- Complainant's full name, address, and country of residence.
- Complainant's email address (which the player account was registered with).
- Date of the complaint.
- A clear and detailed description of the issue, including relevant dates, times, and game details (if applicable).
- Any supporting documentation (e.g., transaction records, screenshots, correspondence).

3.2 Record-Keeping

Farup Entertainment will maintain a log of all complaints, including:

- Complaints resolved internally (whether upheld or rejected).
- Unresolved complaints.
- Complaints escalated to ADR.
- Complaints escalated to legal proceedings.

All complaint records will be securely maintained for at least five (5) years, including details of unresolved complaints and complaints escalated to ADR or legal proceedings.

3.3 Regulatory Reporting Farup Entertainment will submit reports to the CGA (on the 15th of January and the 15th of June every year), summarizing the following:

- Total number of complaints made.
- Total number of complaints closed (settled and rejected).
- Number of pending or unresolved complaints.
- Number of complaints by category.
- Number of complaints referred to ADR and the outcomes of each.
- Number and details of complaints for which a player has taken legal action.

4. Terms and Conditions

This Complaints Policy will be published on the Farup Entertainment website as a standalone link as well as clearly presented in the terms and conditions. The information will include, at a minimum:

- Links to customer service and information on how to contact the casino operator.
- Details of the information required for a player to make a complaint, and information about the complaint form.
- Timelines for acknowledgement, responses, and resolution of complaints.
- Player's rights to complain, including the right to use ADR services and escalate matters to the CGA (under the conditions outlined in this policy).
- An explanation of the potential consequences of the relevant ADR entity's decision, and the manner in which this will affect the player's right to further legal and judicial recourse.
- Details of the ADR process and player rights.
- Contact information for the ADR provider(s).
- A clear statement that the CGA does not mediate in individual disputes, but that players may contact the CGA if they believe Farup Entertainment has breached regulations.