

PLAYER COMPLAINTS POLICY

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DOCUMENT CONTROL

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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 in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (*Landsverordening op de kansspelen*, “LOK”).

Adherence to this Complaints Policy is considered a requirement under the LOK, and failure to comply will be addressed by the Curacao Gaming Authority (CGA) in accordance with its supervision, monitoring and enforcement procedures.

The Complaints Policy guarantees players access to a straightforward and effective complaint and dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

In accordance with Article 5.3 of the LOK, further rules, policies and guidelines regarding complaints and ADR processes may be established and implemented from time to time.

2. DEFINITIONS

2.1 PLAYER INTERACTION

The player is free to initiate any written communication directed to the customer service team using the channels as outlined on the Terms & Conditions. The written communication may include general enquiries, feedback, or requests for information, assistance, or clarification.

2.2 COMPLAINT

A player may write an expression of dissatisfaction relating to the services, decisions, terms, or conduct, and expects a response or resolution.

2.3 DISPUTE

A dispute is considered to be a written complaint that has not been resolved to the player’s satisfaction through the internal complaints process and has been escalated, either within the company or to an independent third party (e.g. an ADR provider or court of law).

3. COMPLAINT SUBMISSION PROCESS

3.1 COMPLAINT WINDOW

Players may lodge a complaint free of charge at any time up to six months after the settlement of the bet or the incident about which they are making a complaint. In the case of P2P (such as poker) or ante post fixed odds betting the six month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager. In the case of complaints about in-running sports betting, customers must be advised that while they may submit a complaint within six months, prompt action may be necessary if the investigation may depend on data specific to the complaint which — due to the nature of inrunning betting — may no longer be available after a short period, insofar as the operator cannot reasonably be expected to preserve such data any longer.

3.2 STAGES/ ESCALATION OF COMPLAINT RESOLUTION

Complaints can only be made by the registered player. Article 1.3 section C of the LOK mandates that a player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the operator.

In the first instance, we offer customer support via email and/or live chat, and an official Complaint Submission Form is available on our website.

We may request supporting documentation which requires to be included as part of the complaint. Any additional information or documentation requested by us must be reasonable in the context of complaint resolution. An ADR option may be offered subject to the requirements of Clause 5.

4. COMPLAINT RESOLUTION PROCESS

4.1 TIMELINE: RESPONSIBLE GAMING COMPLAINTS

Complaints related to responsible gaming are prioritized due to potential impacts on player well-being, and we use the best efforts to resolve these cases within five business days.

Within two days of receiving a complaint, we will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

If more time is needed to make a reasonable and informed decision, players are informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.

4.2 TIMELINE: RESPONSIBLE GAMING COMPLAINTS

We will assess and respond to complaints within four weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the player.

Within one week of receiving a complaint, we will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

4.3 RESPONSE AND RESOLUTION

A player will always receive a final determination of their complaint in writing. The response will be either:

1. A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
2. Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, we must have requested this information within the initial four week time period. Should the complainant not provide the necessary information within that time period, we may reject the complaint.
3. If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player is informed that they may escalate the matter to an independent ADR entity.

5. ALTERNATIVE DISPUTE RESOLUTION

In order to be compliant with the license conditions as mandated by LOK, we offer independent ADR. The full ADR process is included in the Terms and Conditions. If a complaint cannot be resolved internally, players are entitled to escalate the matter to the independent ADR provider, free of charge. For avoidance of doubt, we will bear all costs of the ADR process. Once an ADR process is completed it cannot be recommenced by either the player or us with another different ADR entity. In the event that the player drops out of the ADR process (but it has already begun) – it should be noted the player should not have the right to resurface the dispute in the future.

6. REASONS FOR COMPLAINT

The player has the right to make a complaint regarding any part of their relationship with us or any incident related to their participation in a game of chance. This includes (but is not limited to):

1. Deposit issues
2. Withdrawal issues
3. Bonus terms and conditions
4. Account closures or restrictions
5. Alleged errors or unfairness in game outcomes
6. Responsible gaming issues
7. Treatment of player balances
8. KYC and Verification
9. Data Protection
10. Technical or Software issues
11. AML concerns
12. Issues with minors
13. Fraudulent games
14. Fraudulent practices
15. License or regulation 16. Unfair terms and conditions