

CW Marketing B.V. – Player Complaint Policy

1. Policy Overview

This Complaints Policy outlines how CW Marketing B.V. ensures fair, transparent, and efficient resolution of player complaints in compliance with Article 5.3 of the National Ordinance on Games of Chance (LOK). It guarantees access to free and effective complaint and dispute resolution processes, including independent Alternative Dispute Resolution (ADR).

This policy forms part of our Terms and Conditions and is accessible via our homepage and registration page. By using our services, players confirm acceptance of this policy.

2. Definitions

- **Complaint:** A written expression of dissatisfaction by a player regarding CW Marketing B.V.'s services, conduct, terms, or decisions, requiring a response or resolution.
- **Dispute:** A complaint not resolved to the player's satisfaction and escalated to ADR or a legal body.
- **Player Interaction:** Any communication from the player to customer support, including inquiries and feedback.

3. Complaint Submission Process

3.1 Complaint Window

- Players may file a complaint free of charge within six months of the event in question (e.g., settlement of a bet or game).
- For P2P games or ante-post betting, the six months start from event conclusion.
- For in-running betting, players are advised to act quickly due to possible loss of temporary data.

3.2 Complaint Stages

1. Initial Contact:

Complaints must be submitted by the registered player via email or live chat.

2. Complaint Submission Form:

A Complaint Submission Form will be made available to the player, which must be completed and returned in order to initiate the complaints process.

Required fields include:

- Full name, address, and country of residence
- Player account number
- Date of the complaint and the related incident
- Description and category of the complaint

The form is available in English and in the language of the player's website.

3. Escalation to ADR:

If unresolved, the complaint may be referred to an independent ADR provider.

3.3 Role of the CGA

- The CGA does not intervene in individual complaints but may take regulatory action if the complaint reveals breaches or malpractice.
- Players can contact the CGA for regulatory issues but not for dispute resolution.

4. Complaint Resolution Process

4.1 Responsible Gaming Complaints

- Prioritized and resolved within 5 business days.
- Initial acknowledgement within 2 days.
- If delayed, resolution within 2 weeks (extendable by another 2 weeks if delay is player-related).

4.2 Other Complaints

- Resolution within 4 weeks (extendable once by another 4 weeks if necessary).
- Acknowledgement and explanation provided within 1 week.

4.3 Response Format

- A clear decision with reasoning or explanation for complaint rejection.
- Information on escalating to ADR if needed.

5. Alternative Dispute Resolution (ADR)

- ADR services provided free of charge through CGA-certified entities.
- ADR agreement uploaded to CGA portal.
- ADR outcomes are final and cannot be restarted with another entity.
- Players who abandon ADR may not re-initiate it.
- Players retain legal rights unless otherwise agreed.

6. Record-Keeping and Reporting

- Reports submitted to CGA biannually.
- Reports include totals of complaints received, resolved, pending, and escalated.
- Records kept for up to 5 years or as legally required.
- Records provided to CGA upon request.

7. Policy Visibility and Terms

- Policy is accessible via homepage and registration.
- Clearly included in Terms and Conditions with:

- Contact info
- Complaint steps and timelines
- Player rights (ADR, CGA)
- Regulatory disclaimers

8. Examples of Complaint Topics

- Deposits and withdrawals
- Bonus terms
- Account issues
- Game fairness
- Responsible gaming
- KYC, AML, data protection
- Technical or regulatory issues

9. Policy Review and Transition

This policy is effective from July 2025 and will be submitted to the CGA before the 31st July 2025 deadline. CW Marketing B.V. reserves the right to revise this policy as required by regulatory updates or operational needs.

APPENDIX 1.0

COMPLAINT FORM

Please complete all fields clearly and accurately.

1. Full Name:

2. Address and Country of Residence:

3. Nationality:

4. Player Account Number:

5. Date of the Complaint:

6. Date of the Disputed Event:

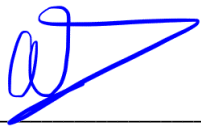
7. Description of the Complaint:

(Please provide a detailed explanation of the issue or concern, including any relevant facts or circumstances.)



8. Category of the Complaint:

- ☐ Account Issues
- ☐ Technical Problems
- ☐ Payment / Withdrawal
- ☐ Bonuses / Promotions
- ☐ Responsible Gaming
- ☐ Customer Support
- ☐ Other (please specify): _____

Signature:  _____

Name: eMagnus Curacao B.V. Managing Director

Date: 7/28/2025

Approvals

Document Title	Player Complaint Policy
Author	Compliance Department
Department	Compliance / Legal
Reviewed by	Andrea Maria Engelhardt
Approved by	Andrea Maria Engelhardt/ Director
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