

PLAYER COMPLAINTS POLICY

Breakout Group B.V.

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Effective

Date: July 21, 2025

Contact: compliance@breakoutgroup.com



This Player Complaints Policy (hereinafter the "Policy") governs the procedure for submission, handling, escalation, and resolution of player complaints and disputes at Odds96. This Policy is implemented in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, "LOK") and the relevant guidelines issued by the Curaçao Gaming Authority ("CGA"). This Policy shall form an integral part of the Terms and Conditions of the Website and is legally binding on all registered players.

1. Scope and Purpose

This Policy ensures that all players have access to a transparent, fair, timely, and cost-free process for submitting complaints and escalating disputes arising from their interaction with Odds96. The Policy guarantees access to independent Alternative Dispute Resolution ("ADR") mechanisms and provides clear stages for the handling of complaints, including initial support, formal review, and potential escalation.

2. Definitions

Complaint - a written expression of dissatisfaction submitted by a player relating to the services, conduct, terms, or decisions of Odds96, which reasonably requires a response or resolution.

Dispute - a complaint that remains unresolved to the player's satisfaction after completion of the internal complaints procedure and is escalated to ADR or legal proceedings.

Player Interaction - any written communication from the player to customer support, including inquiries, feedback, or assistance requests.

3. Submission of complaints

3.1. Complaints may only be submitted by the registered player associated with the relevant account. Third-party submissions are not permitted.

A complaint must be submitted within six (6) months from the date of the settlement of the bet or the occurrence of the relevant event. For peer-to-peer games (e.g., poker) or ante-post bets, the period begins after settlement or event conclusion. For in-play betting, players are advised to submit complaints promptly, as relevant data may not be retained indefinitely.

3.2. Players may lodge a complaint by:

- Contacting customer support via live chat or email, providing at a minimum the information specified in the Player complaint submission form, and ensure that the complaint description complies with the types and criteria set out in Section 3.3 of this Policy.

PLAYER COMPLAINT SUBMISSION FORM

- Full Name: _____
- Residential Address: _____
- Email Address (used on the account): _____
- Username / Account Number: _____
- Date of Complaint Submission: _____
- Date of Incident / Disputed Event: _____
- Type of Complaint: _____
- Complaint Description: _____



- Supporting Documents: _____

The Complaint shall be available in English and in the language of the website version accessed by the player.

3.3. Players may submit complaints related to, but not limited to:

- Deposit and withdrawal issues
- Bonus terms and wagering requirements
- Account closures, restrictions, or balance handling
- Game fairness and technical malfunctions
- KYC/AML procedures and delays
- Data protection and privacy concerns
- Responsible gaming, self-exclusion, or misuse of player status
- Fraudulent activities or software errors
- Disputes over the interpretation of the Terms and Conditions
- Alleged violations of the operator's regulatory obligations

4. Complaint handling procedure

4.1. Complaints involving responsible gaming (e.g., self-exclusion, vulnerable players) are prioritized and must be resolved within five (5) business days. Within two (2) business days of receipt, Odds96 will:

- Confirm receipt of the complaint in writing
- Provide a description of the resolution process
- Communicate estimated resolution timelines

In the event of delays, the player will be notified. The maximum total resolution period is two (2) weeks, extendable by two (2) additional weeks only if the delay is due to the player's non-responsiveness.

4.2. All other complaints shall be:

- Acknowledged within seven (7) calendar days
- Processed and resolved within four (4) weeks, with a one-time extension of an additional four (4) weeks in case of complexity or insufficient information (subject to prior notice)

4.3. All complaints will receive a final written response, which shall include:

- A reasoned outcome with supporting facts and/or evidence, or
- A clear explanation for declining to handle the complaint, or
- Instructions to escalate to ADR if the player remains dissatisfied.

If additional information is required, it must be requested within the initial resolution period. If the player does not respond within that period, the complaint may be closed.

5. Escalation to ADR

If a complaint cannot be resolved through our standard procedure, it may be referred to an external dispute resolution body (ADR), as required by applicable regulations.

- Access to ADR is provided in line with licensing rules, without additional charges for the player.
- All procedural costs are handled by the operator.
- Each complaint can only be reviewed by one ADR provider.
- Once the ADR process has started, it cannot be restarted with another provider.
- If a player chooses to discontinue the process, the matter will be considered closed and cannot be raised again.

Information about the ADR providers we cooperate with will be made available on a dedicated page of our website.



6. Role of the Curaçao Gaming Authority (CGA)

The CGA does not intervene in individual complaints or disputes

Players may contact the CGA to report suspected regulatory breaches, whistleblowing concerns, or non-compliance with license conditions

The CGA may use complaint data for supervisory or enforcement purposes

Operators must not obstruct a player's right to communicate with the CGA directly

7. Miscellaneous

All matters not expressly governed by this Policy including, but not limited to, procedures for record-keeping and reporting, the use of internal operator resources, application of automated or AI-based dispute resolution tools, communication with supervisory authorities, internal audits, and any other aspects of complaint handling shall be regulated by the applicable laws of Curaçao, including the National Ordinance on Games of Chance (LOK), binding guidelines issued by the Curaçao Gaming Authority (CGA), and the internal policies and procedures of the operator.

Approved by: eMagnus Curacao B.V.

Managing Director

Breakout Group B.V.

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