

Player Complaints Policy

Effective Date: 08.07.2025

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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 Article 5.3 of the National Ordinance on Games of Chance ("LOK").

Compliance with this policy is a licensing requirement. Non-compliance will be addressed by the Curaçao Gaming Authority (CGA) in accordance with its supervisory, monitoring, and enforcement procedures.

The policy guarantees access to a straightforward complaint and dispute resolution process, including free access to independent Alternative Dispute Resolution (ADR) services.

This policy must be clearly outlined in the Terms and Conditions and may also be published as a standalone document.

2. Definitions

- **Player Interaction:** Any written communication initiated by a player directed to customer service.
 - **Complaint:** A written expression of dissatisfaction relating to our services, decisions, or conduct.
 - **Dispute:** A complaint not resolved to the player's satisfaction that is escalated internally or externally.
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3. Complaint Submission Process

3.1 Complaint Window

- Applies to all players from date of license issuance.
- Players may submit complaints up to 6 months from the settlement of the event.
- In cases involving P2P, ante-post or in-running betting, timelines apply based on final settlement or data availability.

3.2 Submission Requirements

- Only the **registered player** may submit complaints.
- Support is available via **email and live chat**.
- A **Complaint Submission Form** must be:

- Available as a downloadable or online form.
- Include: full name, address, account number, complaint date, disputed event date, and description (with category options).
- Available in **English** as primary language of the website.
- Operators may request reasonable supporting documentation.

3.3 Role of the CGA

- The CGA does not mediate or decide individual complaints.
 - Players may contact the CGA directly for issues like malpractice or license breaches.
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4. Complaint Resolution Timeline

4.1 Responsible Gaming Complaints

- Confirmation of receipt: within 2 business days.
- Resolution: within 5 business days, extendable by 2 weeks.
- Delays due to the player may allow for one further 2-week extension.

4.2 Other Complaint Types

- Confirmation of receipt: within 7 days.
- Resolution: within 4 weeks, extendable once by an additional 4 weeks.

4.3 Response and Outcome

- Final determination provided in writing, including:
 1. Reasoned outcome with evidence.
 2. Reason for rejection if applicable.
 3. Request for more info (must be done within 4 weeks).
 4. Player informed of right to escalate to ADR.

4.4 Use of AI

- AI must not handle Responsible Gaming or complex complaints.
 - AI recommendations must be consistent and monitored.
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5. Alternative Dispute Resolution (ADR)

- ADR must be free for players; operator bears all costs.
 - Once ADR is concluded, it cannot be re-initiated with another provider.
 - Players dropping out of ADR may not re-initiate the complaint.
 - ADR provisions must be detailed in Terms and Conditions.
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6. Record-Keeping and Reporting

- Reports must be submitted biannually (Jan 15 and Jun 15), starting Jan 2026.
 - Reports must include:
 - Number of complaints received, resolved, unresolved
 - Category breakdown
 - ADR and legal referrals
 - Records must be retained for up to five years or in accordance with applicable law.
 - CGA may request complaint records at any time.
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7. Publication and Terms and Conditions

- This policy will be accessible via a standalone link on our website.
 - It is also integrated into our Terms and Conditions, including:
 - Contact methods
 - Submission process and form
 - Resolution timeline
 - Rights to ADR and CGA contact
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8. Reasons for Complaint

Players may raise complaints related (but 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