

# Player Complaints Policy

**Version 1.0 — Effective Date: July 25, 2025**

**Next review date: July 25, 2026**

## 1. Introduction

This Player Complaints Policy outlines the procedures and standards adopted by Code Harbor N.V. (the Operator) to ensure the fair, transparent, and efficient resolution of player complaints. 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 Curacao Gaming Authority (CGA) Player Complaints Policy Guidelines Version 1.1 (18 June 2025).

Our objective is to ensure that all players have access to a clearly defined and legally compliant process to address grievances and disputes, including the right to free Alternative Dispute Resolution (ADR). We treat every complaint seriously and commit to resolving them in a timely, respectful, and lawful manner.

## 2. Definitions

**2.1 Player Interaction:** Any written communication initiated by a player directed to the operator's support team.

**2.2 Complaint:** A written expression of dissatisfaction by a registered player regarding services, decisions, or actions taken by the operator.

**2.3 Dispute:** A complaint that has not been resolved internally and has been escalated to an independent third party such as an ADR provider or a legal authority.

## 3. Complaint Submission Process

### 3.1 Timeframe:

Complaints must be submitted within six (6) months from the date of the incident or event in question. In P2P or ante-post betting, the timeframe begins at the conclusion of the event. In-running (live) betting complaints should be submitted as soon as possible due to the transient nature of data.

### 3.2 Eligibility:

Only the registered account holder may file a complaint. Claims may not be transferred, pledged, or assigned.

### 3.3 Submission Channels:

- **Step 1: Contact Customer Support** via email (support@wildwinz.com ) or live chat.
- **Step 2: Submit Formal Complaint** using the online form or downloadable Complaint Submission Form (available in English and other supported languages).

**Required Information:**

- Full name, address, and country of residence
- Account ID or username
- Date of complaint and disputed event
- Category and detailed description of complaint
- Supporting documentation

**Categories:** Deposit issues, withdrawal issues, bonus terms, account restrictions, game errors, responsible gaming, KYC, AML, privacy/data protection, technical errors, minors, fraudulent activity, regulatory breaches, unfair terms, and others.

**4. Complaint Resolution Process****4.1 Responsible Gaming Complaints:**

- Acknowledgment within 2 business days
- Resolution within 5 business days
- Max extension: 2 additional weeks with notice
- Extended only for delay due to player non-response

**4.2 Other Complaints:**

- Acknowledgment within 7 calendar days
- Resolution within 4 weeks
- Extension: One additional 4-week period, with written notice

**4.3 Final Determination:**

All complaints receive a written final response that includes:

- Reasoned decision
- Summary of findings
- Evidence or relevant procedures
- Instructions for ADR if unsatisfied

**4.4 Artificial Intelligence:**

AI tools are not used.

- Responsible Gaming and all complaints are handled only by human staff.

**5. Alternative Dispute Resolution (ADR)**

### **5.1 ADR Access:**

If a complaint remains unresolved, players may escalate to a CGA-approved ADR provider free of charge.

This section will be updated shortly to include the contact information and process instructions of the designated ADR provider.

### **5.2 ADR Conditions:**

- No re-submission to another ADR once resolved
- Withdrawal from ADR forfeits reopening rights
- ADR decisions are binding within the scope of the dispute

### **5.3 ADR Limitations:**

To prevent abuse, we may impose:

- Minimum claim value (except Responsible Gaming or regulatory complaints)
- Requirement to complete internal procedure first
- Exclusion of malicious/frivolous complaints (subject to CGA guidance)

## **6. Record-Keeping and Reporting**

- Complaint records retained for five (5) years
- Biannual reporting is made to CGA (January 15 and June 15):
  - Number and type of complaints
  - Resolved, pending, rejected
  - ADR referrals and legal actions

## **7. Player Rights**

Players may complain about any aspect of their gaming experience, including:

- Financial transactions (deposits/withdrawals)
- Bonuses and terms
- Account issues
- Responsible gaming failures
- KYC/AML processing
- Privacy and technical matters
- Regulatory concerns or misconduct

## **8. CGA Role**

The CGA does not intervene in individual complaint outcomes but may:

- Investigate systemic breaches
- Respond to license violations or misconduct

- Receive whistleblower reports

Players may contact the CGA at: <https://www.gamingcontrolcuracao.org/contact>

## **9. Policy Availability**

This policy is available:

- On our website as a standalone page
- Linked in the Terms and Conditions
- Presented at registration (via checkbox)
- In English and other supported languages

## **10. Version Control and Transition**

- Effective Date: July 25, 2025
- Uploaded to CGA Portal as required
- ADR information will be updated and published no later than 31 July 2025

## **11. Commitment to Fairness**

Code Harbor N.V. is committed to:

- Fair and timely complaint handling
- Respectful and impartial treatment of all players
- Ensuring transparency and legal compliance

For assistance, contact:

- Customer Support: [support@wildwinz.com](mailto:support@wildwinz.com)
- Complaints Office: [compliance@wildwinz.com](mailto:compliance@wildwinz.com)

Yevhen Dyba



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Signature