



## POLICY DOCUMENT

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# CASINO COMPLAINT POLICY

## 1. Introduction

At Everum N.V. we strive to provide the best possible gaming experience to our valued customers. We understand that occasionally concerns or issues may arise, and we are committed to resolving any complaints in a fair, timely, and transparent manner. This Casino Complaint Policy outlines the process and procedures for lodging and addressing complaints related to our casino services.

## Definitions

**Complaint:** A written expression of dissatisfaction by a player relating to the services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution.

**Dispute:** A complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated, either within the organization or to an independent third party

**ADR:** Alternative Dispute Resolution—a third-party, impartial body authorized to assess unresolved complaints.

**GCB:** Curaçao Gaming Control Board, the central regulatory authority for online gaming operators licensed in Curaçao.

## 2. Scope

This policy applies to complaints involving:

- Account Issues: Problems with registration, login, verification (KYC), account closure or suspension.
- Financial Transactions: Deposit failures, withdrawal delays, incorrect balances, transaction rejections.
- Game Functionality and Fairness: Technical problems, perceived rigging, payout miscalculations, or error disputes.



- **Bonuses and Promotions:** Disputes about bonus conditions, locked funds, wagering requirements, or alleged misrepresentation.
- **Responsible Gambling Tools:** Concerns related to self-exclusion, loss limits, or duty-of-care failures.
- **Terms & Conditions Enforcement:** Alleged unfair treatment or misapplication of the casino's rules and player agreements.
- **Privacy and Data Protection:** Complaints related to mishandling of personal information.

### **3. Complaint Submission Process**

#### **3.1. Complaint window**

Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint.

#### **3.2. How to Submit a Complaint**

Customers can lodge a complaint by using any of the following communication channels:

- Email: [support@everumcasino.com](mailto:support@everumcasino.com)
- Live Chat located at Casino's website
- Official Complaint Submission Form: [everumcasino.com/complaints/submit](https://everumcasino.com/complaints/submit)

#### **3.3. Complaint Requirements**

To ensure a smooth and efficient resolution process, customers must provide the following information when lodging a complaint:

- a. Full name and registered account details
- b. Detailed description of the complaint, including relevant dates and times
- c. Supporting evidence, such as screenshots or transaction records
- d. Any steps taken to resolve the issue prior to lodging the complaint

### **4. Complaint Handling Process**

#### **4.1. Acknowledgment**

Upon receipt of a complaint, we will send an acknowledgment to the customer's provided contact details within 72 hours. The acknowledgment will include a unique reference number for tracking purposes.

#### **4.2. Investigation**



Our dedicated complaint handling team will thoroughly investigate the complaint, considering all relevant information and evidence provided by the customer. We may also request additional information or clarification if necessary.

Investigations involve:

- Verification of account data and system logs
- Review of transaction records
- Consultation with third-party game providers (if needed)
- Assessment of relevant terms and conditions

#### **4.3. Resolution**

We aim to provide a resolution to the complaint within 14 business days period. If the complaint is straightforward, we will strive to resolve it as quickly as possible. However, complex complaints may require more time for a thorough investigation.

Complaints related to responsible gaming should be prioritized due to potential impacts on player well-being, aiming to be resolved within five business days.

#### **4.4. Communication**

Throughout the complaint resolution process, we will maintain regular communication with the customer in writing (via email), providing updates on the progress and expected resolution timeframe. A player will always receive a final determination in writing (via email).

#### **4.5. Fairness and Impartiality**

We will handle all complaints impartially and in a fair manner, ensuring that all parties involved are given an opportunity to present their case and provide supporting evidence.

#### **4.6. Confidentiality**

We respect the privacy of our customers, and all information provided during the complaint handling process will be treated with strict confidentiality, in accordance with our Privacy Policy.

### **5. Escalation**

If a customer is dissatisfied with the outcome of the complaint or the way it was handled, they may request an escalation. The request for escalation should be made in writing and sent to [admin@everumcasino.com](mailto:admin@everumcasino.com). The escalation will be reviewed by a senior member of the management team, who will conduct a further investigation and provide a final decision.



## **6. Alternative Dispute Resolution (ADR)**

If the customer remains unsatisfied with the resolution provided by Everum N.V., they may seek Alternative Dispute Resolution bodies recognized by Curaçao authorities.

Players may submit their complaint by visiting the ADR provider's website and completing their complaint form. This includes:

- Casino name and license number
- Complaint reference ID
- Description of issue and evidence provided
- Copy of communication between player and casino

ADR providers may require written confirmation that the internal casino process has concluded.

ADR investigations typically conclude within 30 to 90 days. The ADR body will inform both the player and the casino of its findings and recommendations.

ADR is provided free of charge to the player for valid complaints.

## **7. Record Keeping and Audit Trail**

Everum N.V. maintains a detailed log of all complaints received, including:

- Complaint reference ID
- Date submitted
- Summary of the issue
- Actions taken
- Resolution and date closed

These logs are retained for a minimum of five (5) years and are available for audit by the GCB upon request.

## **8. Policy Review**

This Player Complaints Policy is reviewed at least once per year, or whenever regulatory updates occur. All changes are communicated clearly on our website and to the Curaçao Gaming Control Board.



Approved by Board of Directors

22.07.2025

Last Reviewed: July 2025

Next Review Due: July 2026