

Deep Dive Tech B.V. Policy of Player Complaints Handling

Table of Contents

1. Objective	1
2. Definitions.....	1
3. Complaint Channels & Access	2
4. Internal Complaint Handling Procedure	2
4.1 Initial Acknowledgment.....	2
4.2 Resolution Timelines.....	2
4.3 Use of Artificial Intelligence.....	2
5. Final Response Requirements.....	3
6. ADR (Alternative Dispute Resolution).....	3
7. Escalation and CGA Role	3
8. Record-Keeping & Reporting	3
9. Terms & Conditions and Website Integration	3
10. Valid Complaint Categories.....	4

Version: 1.0

Effective Date: 18/06/2025

Based on: CGA Player Complaints Policy – June 2025, version 1.1

1. Objective

To ensure our handling of player complaints complies with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the CGA Complaints Policy Guideline by providing a fair, transparent, and timely process.

2. Definitions

- Player Interaction – Any written communication by a player via live chat or email.
- Complaint – Written dissatisfaction concerning our service, decisions, or conduct that expects a response.

- Dispute – A complaint not resolved internally and escalated to an ADR provider or court.

3. Complaint Channels & Access

Players must be able to lodge complaints via:

- Live Chat and/or Email
- Official Complaint Submission Form (downloadable or online)

The Complaint Form must:

- Be available in English and the player's language
- Include required fields: Name, Account Number, Contact Details, Date of Incident, Category, and Description

Players can file complaints within 6 months from the incident/bet settlement.

4. Internal Complaint Handling Procedure

4.1 Initial Acknowledgment

- Responsible Gaming Complaints:
 - Acknowledge in writing within 2 business days
- All Other Complaints:
 - Acknowledge in writing within 1 week

Include:

- Confirmation of receipt
- How the complaint will be handled
- Estimated timeline for resolution

4.2 Resolution Timelines

- Responsible Gaming Complaints: Resolve within 5 business days
 - Delay allowed up to 2 weeks (notify player)
- Other Complaints: Resolve within 4 weeks
 - Extension allowed once, to 8 weeks total (player must be notified)

4.3 Use of Artificial Intelligence

- AI is allowed in simple complaints but:
 - Human handling is required for:
 - Responsible Gaming cases
 - Complex matters
 - AI decisions must be monitored for consistency and fairness

5. Final Response Requirements

Each complaint must receive a final written response that includes:

1. Final assessment and decision with reasoning (and evidence if needed), or
2. Reasons for not handling the complaint (e.g. insufficient documentation), and
3. Information about the right to escalate to ADR if unsatisfied.

6. ADR (Alternative Dispute Resolution)

- Agreement with at least one CGA-approved ADR provider must be in place.
- ADR must be:
 - Free to the player
 - Clearly explained in Terms & Conditions
- Once started, ADR cannot be restarted with another provider.
- If player abandons ADR, they cannot reopen the case.
- Operators may set conditions (e.g. minimum value) but must be justified and legally sound.

7. Escalation and CGA Role

- CGA does not resolve individual complaints
- Players can contact CGA for license breaches or misconduct
- Operators must NOT:
 - Prevent player from contacting CGA
 - Misrepresent CGA's role

8. Record-Keeping & Reporting

- Submit reports twice a year (Jan 15 and Jun 15) including:
 - Total complaints, resolved/unresolved
 - By category, by outcome
 - Number escalated to ADR or legal
- Keep records for 5 years (or shorter per law)
- Provide records to CGA upon request

9. Terms & Conditions and Website Integration

- Complaints procedure must be:
 - Clearly included in the Terms & Conditions
 - Visible on the website
- T&Cs must include:
 - Complaint channels
 - Timelines

- ADR rights
- CGA disclaimer
- Contact details for ADR provider

10. Valid Complaint Categories

- Deposits/Withdrawals
- Bonuses
- Account restrictions/closures
- Game fairness/errors
- Responsible Gaming
- Balance handling
- KYC/Verification
- Data Protection
- Technical issues
- AML/minor issues
- Fraudulent games or activity
- Licensing or regulatory concerns