

PLAYER COMPLAINTS POLICY

(last update 05.11.2025)

1. Introduction

This Player Complaints Policy (the “Policy”) has been established in compliance with the National Ordinance on Games of Chance (LOK) and the Curaçao Gaming Authority (CGA) guidelines regarding player complaints and dispute resolution.

Promotech N.V., registration number 165167, address: Dr. H. Fergusonweg 1, Curaçao (hereinafter referred to as “we” or the “Company”), is dedicated to maintaining a transparent, fair, and accessible complaint handling procedure for all users of its domain, <http://fortunica.casino/> (the “Website”).

As an operator licensed under Curaçao jurisdiction (OGL/2024/611/0233), the Company acknowledges the importance of resolving player disputes promptly and fairly.

Under this Policy, players have the right to submit complaints and, where necessary, escalate unresolved issues to an independent Alternative Dispute Resolution (ADR) entity.

All terms used in this Policy shall carry the meanings assigned to them by the LOK and CGA guidelines.

1.1 Player interaction

Player Interaction encompasses any written communication initiated by a player and directed to the Company’s customer support team, including inquiries, feedback, requests for assistance, or clarifications. Such communications are not necessarily complaints. A communication is classified as a complaint only when the player expresses dissatisfaction with specific actions or decisions of the Company and requests an official response or resolution.

1.2 Complaint

The Company is committed to delivering the highest standard of service. Should you have concerns related to the operation of our platform, our terms and conditions, technical difficulties, or the conduct of our staff, you may submit a formal written complaint. Section 8 of this Policy provides a non-exhaustive list of possible grounds for submitting a complaint. We undertake to review all complaints in line with the procedures set out herein and to

provide a detailed response. To facilitate effective handling, please include all relevant information when submitting your complaint. Only registered players are permitted to submit complaints, and this right is non-transferable to third parties.

1.3 Dispute

If you are dissatisfied with the resolution of your complaint through our internal processes, you have the right to escalate the matter to an independent authority. The Company supports constructive engagement and fully respects the player's right to pursue resolution through Alternative Dispute Resolution (ADR) services or legal action if desired.

1.4 Alternative dispute resolution (ADR)

The Company is committed to transparency and fairness in resolving disputes. When a disagreement cannot be settled directly between the player and the Company, we provide the option to escalate the matter to an independent Alternative Dispute Resolution (ADR) body. This impartial process involves a neutral third party who seeks to facilitate a fair resolution without the need for formal court action. Further details about the ADR procedure can be found in Section 5 of this Policy.

2. Deadline for filing a complaint

You may submit at complaints@fortunica.casino formal complaint within six (6) months from the date the issue occurred.

- For disputes related to bets, the six-month period begins from the settlement of the bet.
- For complaints concerning poker or other player-to-player (P2P) games, the timeframe starts from the conclusion of the game session.
- For live betting, we strongly advise submitting complaints as promptly as possible, as certain data may no longer be accessible after a specific time, which could impact the availability of evidence and the resolution outcome.

3. Filing a complaint

3.1. Complaints can be submitted by emailing from the email address registered to your account.

The complaint form should contain the following details:

- Your full name, residential address, and country of residence;
- Your account number;
- The date when the event occurred and the date the complaint is being filed (the complaint filing date is recognized as the date we receive your request);
- A detailed description of the issue;
- Any supporting evidence such as documents or screenshots, if applicable.

We accept complaints submitted in English and in the official language of the website.

4. Timeframes for complaint handling

We are committed to addressing complaints promptly while adhering to specific deadlines depending on the complaint type.

4.1 Responsible gaming complaints

For complaints related to responsible gaming matters (e.g., self-exclusion), we will acknowledge receipt within 2 business days. A full response will be provided within 5 business days from the date the complaint is received.

If additional time is required to investigate the matter thoroughly, the deadline may be extended by up to 2 weeks. In such cases, we will notify you in advance about the delay and the expected timeframe.

4.2 Other complaints

For all other types of complaints, acknowledgment of receipt will be sent within 7 calendar days. A final response will be provided within 4 weeks from receipt of the complaint.

If the case is complex and requires further investigation, the resolution period may be extended by an additional 4 weeks. We will clearly communicate the reason for any delay.

In every instance, you will receive a written response with the outcome of the review. Should we require more information from you during the investigation, we will reach out within the initial 4-week period. If no response is received from you, we reserve the right to close the complaint due to lack of cooperation.

5. Alternative dispute resolution (ADR)

- 5.1. If you disagree with our decision regarding your complaint, you have the right to refer the matter to an independent Alternative Dispute Resolution (ADR) provider. ADR

offers a fair and impartial process for resolving disputes without resorting to court proceedings.

- 5.2. Under Curaçao law, we are required to provide players with the opportunity to submit claims free of charge to an independent ADR provider from the official list approved by the Curaçao Gaming Authority (CGA). However, at present, the CGA has not yet published an official list of certified ADR providers.

Until such list is made available, players may choose to use other reputable and certified ADR organizations that meet standards of transparency, independence, and professionalism at their own expense. This Policy will be updated once the CGA releases its official ADR provider list.

- 5.3. Please note that once the ADR process concludes, the same complaint cannot be submitted again through another provider. Additionally, if a player voluntarily withdraws from the ADR process, the complaint will be considered closed.

6. Curaçao Gaming Authority (CGA) role and complaint handling

- 6.1. The Curaçao Gaming Authority (CGA) does not review or adjudicate complaints related to gambling transactions between players and operators. All such complaints are handled internally by our support and compliance teams according to the procedures set forth in this Policy.
- 6.2. If you believe that we have violated regulatory requirements or breached the terms of our license, you may contact the CGA directly. Complaints to the CGA can be submitted through the online complaint form available on the official CGA website.
- 6.3. Please be aware that the CGA does not mediate individual disputes between players and operators. However, information received by the CGA may be used as part of its supervisory duties to ensure compliance with regulatory standards.
- 6.4. We commit to retaining all complaint records for a minimum of five years. Additionally, we submit biannual complaint reports to the CGA on January 15 and June 15 each year. For more information or to file a report, please visit the CGA's official website:

<https://www.gamingcontrolcuracao.org/>

7. Possible Reasons for Filing a Complaint

You may submit a complaint if you experience any of the following issues:

- Delays in depositing or withdrawing funds;
- Unfair, unclear, or misleading bonus terms and conditions;

- Unjustified account suspensions or bans;
- Errors, glitches, or failures during gameplay;
- Difficulties or delays in identity verification (KYC) processes;
- Incorrect handling or processing of your personal data;
- Insufficient or ineffective responsible gaming measures;
- Technical problems affecting the website or platform;
- Suspected fraudulent activity;
- Breaches of license conditions or platform rules.

This list is intended to help you clearly identify potential grounds for submitting a complaint and to assist our support team in processing your request efficiently. However, it is not exhaustive and does not restrict your right to file a complaint for other valid reasons.