

Player Complaints Policy

Effective date: 30 July 2025

Last updated: 7 October 2025

1. Purpose and Scope

This Player Complaints Policy ensures that all player complaints and disputes are handled transparently, fairly, and efficiently in accordance with Article 5.3 of the *National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”)* and the Curaçao Gaming Authority (“CGA”) Complaints Guidelines.

All registered players of **JER-Team N.V.** have the right to submit complaints free of charge regarding any aspect of their relationship with the operator.

2. Definition of Complaint

A **Complaint** is a written expression of dissatisfaction from a player regarding the operator’s services, conduct, or decisions, indicating that the player expects a response or resolution.

A **Dispute** arises when a complaint is not resolved to the player’s satisfaction through the internal complaints process and is escalated to an independent third party (ADR).

3. How to Submit a Complaint

1. **Who can submit:** Only the registered player may file a complaint.
2. **When to submit:** Complaints may be submitted within six (6) months from the settlement of the relevant bet or incident.
3. **How to submit:**
 - Players may contact our customer support via **email** at legal@roypins.com or **live chat**.
 - If unresolved, players must complete the **Complaint Submission Form**, available online or as a downloadable file.
 - The form must include:
 - Full name, address, and country of residence
 - Player account ID
 - Date of complaint and disputed event
 - Detailed description of the issue
 - Supporting evidence (screenshots, emails, or transaction records) may be requested.

4. Complaint Handling and Resolution

4.1 Responsible Gaming Complaints

Complaints relating to Responsible Gaming, including self-exclusion, vulnerable players, or responsible play tools, are prioritized and must be resolved within **five (5) business days** wherever possible.

Receipt will be confirmed within **two (2) business days**.

If an extension is necessary, players will be informed; total resolution time may not exceed **two (2) weeks**, unless delay is caused by lack of response from the player.

4.2 All Other Complaints

Receipt will be confirmed within **seven (7) days** of submission.

The operator will resolve the complaint within **four (4) weeks**.

In complex cases, the period may be extended once by another **four (4) weeks**, with prior written notice.

4.3 Final Decision

Upon conclusion, players will receive a written response that includes:

- A clear decision and explanation, with supporting evidence where relevant; or
- Reasons why the complaint cannot be processed.

If unresolved, the player will be informed of their right to escalate to ADR.

5. Alternative Dispute Resolution (ADR)

If the player remains unsatisfied, they may escalate the matter to an **independent ADR provider**, free of charge.

[Operator Name] has an agreement with a CGA-certified ADR provider:

[ADR Provider Name, Contact Information]

ADR decisions are final for that process and cannot be refiled with another ADR entity.

The operator bears all ADR-related costs.

The player retains the right to take legal action unless otherwise agreed within ADR terms.

6. Role of the Curaçao Gaming Authority (CGA)

The CGA does **not** resolve individual player complaints.

However, players may contact the CGA if they believe the operator has breached regulatory obligations or license conditions.

CGA contact information:

Website: [<https://www.curacaogamingauthority.org>]

Email: [info@curacaogamingauthority.org]

7. Record Keeping and Reporting

All complaints and resolutions are recorded and retained for up to **five (5) years**, in compliance with data protection and regulatory requirements.

Statistical summaries of complaints are submitted to the CGA twice yearly (January 15 and June 15).

8. Player Rights

Players may submit complaints about, including but not limited to:

1. Deposits or withdrawals
2. Bonus conditions or promotional terms
3. Account closure or restriction
4. Game fairness or technical malfunctions
5. Responsible gaming tools or self-exclusion
6. KYC or verification issues
7. Data protection concerns
8. Alleged fraudulent activity or AML breaches
9. Any other conduct related to participation in games of chance

9. Accessibility

This policy is publicly available on our website and linked from the homepage, registration page, and Terms & Conditions.

Players must acknowledge acceptance of this Complaints Policy during registration.

10. Transition Deadline

This Complaints Policy has been implemented in accordance with the CGA requirement to have a compliant policy uploaded to the CGA Portal by **31 July 2025**.