

Dragon Money Player Complaints Policy

Version 1.0 — Effective Date: July 25th, 2025

1. Introduction

At Dragon Money, we are dedicated to building and maintaining a secure, fair, and transparent gaming environment. Our commitment to responsible conduct extends beyond gameplay and includes how we address and resolve concerns raised by our players.

This Player Complaints Policy is designed to provide a clear and accessible process for resolving any disputes or grievances that may arise. It adheres to the requirements set forth in Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”) and the guidelines issued by the Curaçao Gaming Authority (CGA).

Our aim is to ensure that every player has access to an impartial and efficient mechanism for resolving complaints, including—when necessary—the right to seek assistance from an independent Alternative Dispute Resolution (ADR) body. We believe that transparency and accessibility are essential to maintaining player trust, and we strive to handle each complaint with care, professionalism, and due diligence.

2. Definitions

2.1 Player Interaction

Any written correspondence initiated by a player directed to Dragon Money’s customer service team, including requests for assistance, feedback, questions, or clarification of the terms and services offered. Player interaction does not necessarily constitute a complaint unless it reflects dissatisfaction.

2.2 Complaint

A Complaint is defined as a written expression of dissatisfaction submitted by a registered player regarding Dragon Money’s services, policies, decisions, or any actions that have negatively affected their experience. A complaint must reasonably reflect the expectation of a response or resolution. A complaint becomes formal for reporting purposes once it is submitted using our Complaint Submission Form or escalated to ADR.

2.3 Dispute

A Complaint escalates to the status of Dispute when it remains unresolved after the internal complaints process and has been formally referred to an independent ADR provider or legal authority. Disputes often involve situations where the player challenges the outcome of a resolution or seeks independent review.

3. Submitting a Complaint

3.1 Timeframe for Submission

Players may submit a complaint free of charge within six (6) months of the incident, decision, or bet settlement that gave rise to the complaint. This period begins:

- on the date the disputed bet was settled,
- or on the date the event or issue occurred.

This time limit ensures that records and evidence remain available for meaningful investigation. In the case of peer-to-peer (P2P) games or ante-post fixed odds betting, the six-month timeframe begins after the conclusion or settlement of the event, not the wager placement.

Please note: in cases involving live/in-running sports betting, data may not be retained for an extended period due to the dynamic nature of such events. Prompt filing of complaints is encouraged in these instances to ensure accurate and timely resolution.

3.2 Eligibility

Only the registered account holder may submit a complaint. This is in line with Article 1.3(c) of the LOK, which prohibits players from transferring or assigning their claims to third parties. This measure safeguards the integrity of the process and ensures that only authorized parties are involved.

3.3 Submission Channels

To ensure an efficient and traceable process, players are advised to follow this sequence:

Step 1: Initial Contact with Support

Players should first contact our Customer Support team through:

- Email: support@drgn.casino
- Live Chat: accessible directly from our website interface.

Support representatives will make reasonable efforts to resolve the issue informally and as quickly as possible. If a satisfactory resolution cannot be reached at this stage, the matter may proceed to the formal complaint process.

Step 2: Formal Complaint Submission

If the initial response does not resolve the matter, the player may file a formal complaint using our Complaint Submission Form, available:

- as a downloadable PDF, upon request, or
- through a secure online form on our website (www.drgn.casino/complaints).

The form must include at least the following:

- Player's full name, address, and country of residence
- Account ID or username
- Date of the complaint and of the underlying incident
- Description of the complaint, including relevant facts and category of issue
- Any supporting documentation (e.g., screenshots, correspondence)

The Complaint Submission Form is provided in English and the primary language of the domain through which the player accessed the platform.

Step 3: Escalation

If the player is not satisfied with the final decision issued by Dragon Money, the matter may be escalated to an independent ADR entity (see Section 5). Dragon Money will include escalation instructions and provide all necessary documentation to support the player in initiating the ADR process.

4. Complaint Review and Resolution

4.1 Responsible Gaming-Related Complaints

Due to their sensitivity and regulatory priority, complaints that involve responsible gaming (e.g., failure of self-exclusion tools, targeting of vulnerable players) receive expedited treatment.

Timeline:

- Acknowledgment of receipt within 2 business days
- Resolution target within 5 business days
- If additional time is required, the player will be informed of the reason and the estimated resolution timeframe, not exceeding an additional 2 weeks (4 weeks total). If delays result from missing input by the player, the resolution period may be extended accordingly.

Such complaints are reviewed by trained personnel with expertise in player protection. Decisions in these cases are subject to heightened scrutiny, and any finding of policy failure is reported to our internal Compliance Officer.

4.2 All Other Complaints

All non-responsible gaming complaints are acknowledged within 7 calendar days.

- Dragon Money aims to provide a written resolution within 4 weeks.
- If a longer investigation is needed due to complexity, the deadline may be extended by up to an additional 4 weeks, and the player will be notified in writing.

Examples of issues in this category include disputes about bonus terms, withdrawal delays, or perceived errors in game outcomes. These complaints are assigned a case number and tracked throughout the process to ensure transparency and accountability.

4.3 Final Determination

All formal complaints will receive a written final response that includes:

- The decision and rationale behind it
- References to relevant evidence, procedures, or terms
- Where applicable, a detailed explanation for rejecting the complaint

The written decision marks the closure of the internal resolution process. If the player wishes to pursue the matter further, they will be informed of their right to escalate to ADR.

4.4 Use of Automated Systems

Dragon Money may utilize AI tools to assist in complaint handling where appropriate, under the following conditions:

- Complaints involving responsible gaming or complex issues are handled exclusively by human staff.
- All automated responses are reviewed for consistency, fairness, and compliance.

AI may be used to detect recurring patterns, generate draft responses, or help prioritize complaint queues, but never as a final arbiter of dispute resolution.

5. Alternative Dispute Resolution (ADR)

Dragon Money is currently in the process of formalizing an agreement with an independent ADR provider licensed and approved by the Curaçao Gaming Authority. This process is expected to conclude by 31 July 2025, or within one month of the publication of certified ADR providers by the CGA, whichever is later, as required by CGA regulation.

Until then:

- Players retain full legal rights and may pursue court action independently.
- ADR services will be provided at no cost to the player once activated.

Upon appointment of the ADR provider:

- All ADR procedures, terms, and provider contact information will be made available on the DragonMoney website and incorporated into the Terms and Conditions.
- The ADR entity will operate independently from Dragon Money and maintain its own decision-making framework in line with CGA expectations.

Once the ADR decision has been issued, the complaint is considered closed and cannot be resubmitted to a different ADR entity. If a player withdraws from the ADR process mid-way, they may forfeit the right to reopen the complaint, unless otherwise permitted under applicable civil law.

5.1 ADR Parameters and Limitations

To ensure the fair and efficient operation of the ADR process and to avoid abuse, Dragon Money may, upon appointment of an ADR provider, implement reasonable and proportionate parameters, including:

- **Minimum claim threshold:** Dragon Money may require that a complaint meet a minimum financial value (e.g. €200) in order to be eligible for ADR escalation, unless the complaint involves Responsible Gaming, self-exclusion, or regulatory matters.
- **Mandatory internal resolution attempt:** Players must first complete the internal complaints procedure, including formal submission, before the case can be referred to ADR.
- **Single ADR attempt:** Once a complaint is submitted to ADR and resolved, it cannot be reopened or resubmitted to a different ADR entity.
- **No frivolous or malicious use:** Complaints deemed to be deliberately abusive, repetitive without new evidence, or filed in bad faith may be excluded from the ADR process, subject to CGA guidance.

These parameters will be clearly communicated on our website and in the Terms and Conditions, and shall not restrict any player's rights under applicable civil law or CGA supervision.

6. Data Handling, Reporting, and Retention

Dragon Money maintains complete records of all complaints, their status, and their outcomes, including:

- Communication logs
- Supporting documentation

- Investigation notes
- Resolution statements

Complaint records are stored for at least five (5) years or as required by applicable laws.

Summary reports are submitted to the CGA biannually (on January 15th and June 15th, beginning January 2026), including:

- Total number of complaints received
- Number of resolved, rejected, and pending complaints
- Categorization by issue type (e.g., bonus, KYC, game error)
- Number of escalated disputes to ADR
- Number of complaints that led to legal action

Dragon Money may also voluntarily submit trend analyses or risk assessments based on aggregated complaint data to assist the CGA in supervisory efforts.

7. Rights and Recourse

Players may lodge complaints about any of the following (non-exhaustive list):

- Deposit or withdrawal problems
- Account restrictions, suspensions, or closures
- Bonus terms and misapplication
- Alleged unfair game outcomes
- Responsible gaming features and failures
- Verification and KYC processes
- AML procedures
- Use of personal data or privacy issues
- Technical disruptions or errors
- Alleged misconduct or regulatory breaches

We encourage players to articulate their concerns clearly and to include as much relevant information as possible when submitting a complaint. This will help expedite resolution and reduce unnecessary delays.

Players will never face retaliation or disadvantage for filing a complaint in good faith.

8. Role of the Regulator (CGA)

The Curaçao Gaming Authority does not mediate individual complaints but may take regulatory action in response to:

- Systemic issues
- Breaches of license conditions
- Misconduct or non-compliance

Players may contact the CGA directly via www.cga.cw for regulatory concerns, including whistleblowing. The CGA reviews aggregate data and operator behavior to identify regulatory breaches and non-compliance patterns.

9. Policy Availability and Incorporation

This policy is available:

- As a standalone page on www.drgn.casino/complaints
- As a referenced document within the Terms and Conditions
- At the point of registration (by checkbox or popup)

The policy is provided in English and other supported languages as needed. We encourage players to review the policy before engaging in real-money play.

10. Policy History and Transition

This policy is effective as of July 25th, 2025, and has been submitted to the CGA Portal as part of the regulatory transition process.

An updated version reflecting our appointed ADR provider will be published no later than July 31st, 2025.

11. Fairness and Transparency Statement

At Dragon Money, we recognize that trust is the foundation of our relationship with players. We are committed to:

- Treating every complaint seriously, respectfully, and without bias
- Responding to complaints with professionalism and timely communication
- Acting in good faith to reach a fair and reasoned outcome

We continuously review our internal procedures to enhance fairness, and all staff involved in complaint resolution receive regular training in compliance, customer protection, and conflict resolution.

For any questions related to this policy, players are invited to contact:

- Customer Support: support@drgn.casino
- Complaints Office: complaints@drgn.casino

Dragon Money N.V.

Registered number: 159443

Address: Abraham de Veerstraat 9, Willemstad, Curaçao

Kateryna Veremiienko
Compliance Officer (MLRO)

