

Complaints Handling Policy of Gatepost N.V.

Version 1.2
4th July 2025

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1. Policy Overview

1.1 Purpose

Gatepost N.V., operator of www.coinhero.io, is committed to maintaining the highest standards of fairness, transparency, and responsiveness in the handling of player complaints. This Complaints Policy is fully aligned with the requirements set out in the Curaçao Gaming Authority's 2025 LOK framework and the Player Complaints Policy for Licensed Operators (Guidelines Version 1.1, dated 18th June 2025).

The purpose of this policy is to ensure that all player concerns are addressed promptly, thoroughly, and professionally. Gatepost aims to foster player confidence by providing a clear, accessible, and effective complaints process.

Gatepost N.V. is a company registered in Curaçao under registration number 163081, with its principal place of business located at Zuikertuintjeweg z/n (Zuikertuin Tower), Willemstad, Curaçao.

1.2 Regulatory Compliance

This Complaints Policy adheres to Article 5.3 of the National Ordinance on Games of Chance (LOK), ensuring that players have a formal avenue to raise grievances. It guarantees free access to Alternative Dispute Resolution (ADR) services if internal resolution is unsuccessful. The Curaçao Gaming Authority (CGA) supervises compliance with these requirements and may audit adherence regularly.

2. Definitions

2.1 Complaint

A **Complaint** is any written expression of dissatisfaction from a player regarding any aspect of Gatepost's operations, including but not limited to service delivery, decisions made, or conduct of staff and systems.

2.2 Dispute

A **Dispute** arises when a complaint remains unresolved after internal review and the player chooses to escalate the matter either internally to higher management or externally to an ADR provider or legal authority.

2.3 Player Interaction

Player Interaction refers to general communications or enquiries made by players to customer support that do not constitute a formal complaint.

3. Complaint Submission Process

3.1 Eligibility and Timeframe

Players are entitled to submit complaints within six months following the date of the incident or bet settlement that triggered the concern. Submissions made after this timeframe may not be considered unless exceptional circumstances apply.

In relation to in-play sports betting, while customers are entitled to submit a complaint within six (6) months of the relevant event, due to the time-sensitive nature of in-play sports betting and real-time data, the Company may not be able to fully investigate or address complaints if key data necessary to assess the issue is no longer available at the time of review. As such, Customers are advised that any relevant complaints are promptly submitted on the basis that the Company cannot reasonably be expected to retain such data beyond standard retention periods for live betting events.

3.2 Submission Methods

Complaints must be submitted by registered players using the Complaint Submission Form. This form is accessible online via Gatepost's website or may be downloaded and sent back to the Customer Support Team via email. The form is available in the language of the website that the player is using (e.g. English), and captures necessary details, including:

- Player personal, residential, and account information
- Nature and details of the complaint
- Relevant dates and supporting information

3.3 Supporting Documentation

Gatepost reserves the right to request supporting documentation (such as screenshots, transaction records, or communications) deemed necessary to investigate the complaint thoroughly.

3.4 Important Points

- Submission of complaints is free of charge.
 - Complaints must be submitted by the player directly to ensure authenticity.
 - Players are informed of their right to escalate unresolved complaints to independent ADR providers.
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4. Complaint Resolution Process

4.1 Responsible Gaming Complaints

4.1.1 Prioritization and Timelines

Complaints involving responsible gaming concerns are given the highest priority and the Company will make every effort to resolve such complaints within **five (5) business days**. If more time is needed to make a reasonable and informed decision, the player will be informed about the handling procedure and provide an expected timeline for resolution. Such timelines should not exceed **two (2) weeks**, unless this is due to a lack of feedback from the player, whereby the resolution period may be extended by no more than a further **two (2) weeks**.

4.1.2 Acknowledgement and Communication

Upon receipt of a complaint, Gatepost will acknowledge receipt within **two (2) business days** for responsible gaming complaints, and communicate the following to the player:

- Confirmation of receipt of the complaint in writing.
- An explanation of how the complaint will be processed.
- Notice of the average timeline for resolution of such complaints.

4.2 All Other Complaints

4.1.1 Prioritization and Timelines

All other complaints, which are not of a responsible gaming nature, will be processed and resolved within **four (4) weeks**, with a possible extension of up to an additional **four (4) weeks** for complex cases.

4.1.2 Acknowledgement and Communication

Upon receipt of a complaint, Gatepost will acknowledge receipt within **one (1) week** for all other complaints, and communicate the following to the player:

- Confirmation of receipt of the complaint in writing.
- An explanation of how the complaint will be processed.
- Notice of the average timeline for resolution of such complaints.

4.3 Investigation and Decision

Gatepost will investigate the complaint impartially, gathering relevant facts and evidence. A final written response will be issued, detailing the outcome, rationale, and any supporting documentation or references.

If the player fails to provide the necessary documentation within the initial four (4) week period, the Company reserves the right to reject the complaint.

4.3 Escalation Rights

Should the player be dissatisfied with the final resolution, they may escalate the matter to an independent ADR provider at no cost, as detailed in the Terms and Conditions.

Notwithstanding the above, the Company will not restrict the player's ability to contact the CGA directly with regard to matters including but not limited to malpractice, breach of license conditions or whistleblowing.

5. Alternative Dispute Resolution (ADR)

5.1 ADR Access and Process

If a complaint cannot be resolved internally, players are entitled to escalate the matter to an independent ADR provider, free of charge.

Gatepost guarantees access to a CGA-approved independent ADR entities to resolve disputes impartially outside the internal complaint handling mechanism.

5.2 Information and Transparency

Detailed ADR contact information, procedural guidelines, and related resources are available within Gatepost's Terms and Conditions and on the company website, ensuring players are fully informed of their rights.

5.3 Binding Nature of ADR

The outcome of the ADR process is binding on Gatepost. Players retain the right to pursue legal action in accordance with the ADR terms and applicable laws.

6. Record-Keeping and Reporting

6.1 Record Maintenance

All complaints, including those resolved internally, escalated to ADR, or leading to legal action, will be securely archived for at least five (5) years in compliance with regulatory obligations and data protection standards.

6.2 Reporting to the CGA

Gatepost submits semi-annual reports to the Curaçao Gaming Authority on the 15th of January and June, as of January 2026, summarizing:

- The total number of complaints received
- Types and categories of complaints
- Outcomes and resolution rates

- Number of cases escalated to ADR or legal authorities

6.3 Regulatory Access

The CGA reserves the right to review complaint records and investigate complaint handling practices as part of its regulatory oversight.

7. Terms and Conditions

7.1 Integration

This Complaints Policy is incorporated in full into Gatepost's Terms and Conditions and is published on the company website both as part of the general Terms and as a standalone document for ease of reference.

7.2 Information Provided

Players can find in the Terms and Conditions, details on the complaints procedures, including but not limited to:

- Customer support contact details
 - Step-by-step complaint submission instructions
 - Expected timelines for complaint handling
 - Explanation of ADR rights and CGA contact information
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8. Common Reasons for Complaint

Players may raise complaints regarding various issues including, but not limited to:

- Deposit and withdrawal delays or failures
 - Bonus terms, wagering requirements, and account restrictions
 - Concerns about game fairness, errors, or malfunctions
 - Responsible gaming practices and player protection
 - Verification processes and data privacy concerns
 - Technical difficulties or software bugs
 - Suspected fraud, collusion, or suspicious activity
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9. Transition Deadline

Gatepost confirms that this updated Complaints Policy will be uploaded to the CGA Portal by 31st July 2025, ensuring full compliance with regulatory requirements and timelines.