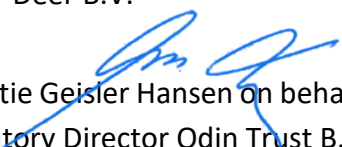


Silver Deer B.V.

Player Complaints Policy

Policy Owner	Silver Deer B.V.
Approver	 Christie Geisler Hansen on behalf of Statutory Director Odin Trust B.V.
Date approved	27 May 2025
Date last reviewed	27 May 2025
Review frequency	Annual
Next review date	May 2026
Responsible for document management	Evgeny Korolkov, MLRO
Security classification	Private and Confidential

1. Introduction

This Player Complaints Policy establishes the procedures and principles adopted by Silver Deer B.V. to ensure that all player complaints are handled fairly, transparently, and in compliance with the National Ordinance on Games of Chance (LOK), Article 5.3, and related regulatory requirements as issued by the Curacao Gaming Authority (CGA).

Our goal is to offer players a streamlined dispute resolution pathway, including free access to independent Alternative Dispute Resolution (ADR) services, and to promote trust and accountability in all player interactions.

2. Scope of the Policy

This policy applies to all complaints submitted by players concerning:

- Game fairness
- Financial transactions (deposits, withdrawals, bonuses)
- Responsible gaming measures
- Account actions (suspensions, closures)
- KYC and verification
- Data protection
- Technical issues
- Any other operational matters

Complaints relating to suspected breaches of regulation may be escalated to the CGA but are not directly mediated by the Authority.

3. Complaint Submission Process

3.1 Submission Timeline

Players may submit a complaint within **six (6) months** of the disputed event, or in the case of ongoing games/events (e.g. poker or ante-post betting), within six months of the **event's final resolution**.

3.2 How to Submit a Complaint

Complaints can be submitted free of charge via:

- Online Complaint Form: [\[Insert URL\]](#)
- Email using the downloadable template: [\[Insert Email Address\]](#)

3.3 Information Required

Players must provide the following information in the complaint:

- Full name, address, and residence

- Account number (if applicable)
- Date of the complaint
- Description of the issue (selectable categories)
- Preferred communication language (English or language of the target market)
- Supporting documentation (if any)

4. Complaint Handling Procedures

4.1 Acknowledgement

Within **seven (7) calendar days** of receiving the complaint, the player shall receive:

- Written confirmation of receipt
- Summary of the complaint process
- Estimated timeline for resolution

4.2 Resolution Timeline

The complaints shall be resolved within the following timelines:

- Responsible Gaming complaints: Resolved within five **(5) business days**, extendable to two (2) weeks with notice
- General complaints: Resolved within four **(4) weeks**, extendable once for a further four (4) weeks if complexity or further data is needed

4.3 Final Determination

Upon thorough analysis of the complaint, players shall receive:

- A written response with reasoning and any supporting evidence
- Notice of rejection if the complaint is incomplete and further information was not provided within the time limit

If unresolved, the player will be advised of the right to escalate the complaint to ADR.

5. Alternative Dispute Resolution (ADR)

5.1 Access and Availability

- We shall provide players with access to **independent ADR services**, free of charge
- An agreement with a CGA-Certified ADR provider shall be publicly available on our websites once the list of Certified ADR providers is available

5.2 Escalation Conditions

- If a complaint remains unresolved internally within the abovementioned term, players shall always be provided with the opportunity to escalate it to ADR
- The Player will be informed by the Silver Deer B.V. about the possibility of contacting the ADR.
- Use of ADR may be mandatory under our Terms & Conditions. Corresponding changes shall be brought to the Terms & Conditions

5.3 CGA Non-Mediation

Since the CGA does not resolve individual disputes, the players shall be provided with the opportunity to notify the CGA of suspected regulatory breaches via the CGA's official online form. The corresponding link shall be kept in the Terms & Conditions and in a public Complaints policy.

6. Record-Keeping and Compliance Reporting

6.1 Record Retention

We maintain a secure log of all complaints, including:

- Internally resolved complaints (upheld/rejected)
- Unresolved complaints
- ADR escalations
- Legal proceedings

These records are retained for **five (5) years**.

6.2 Bi-Annual Regulatory Reports

We submit reports to the CGA on:

- **January 15** and **June 15** annually
- Reports include:
 - Total complaints received
 - Complaints resolved, pending, or escalated
 - Complaint categories and outcomes
 - Legal actions initiated by players

7. Website and Terms Integration

This policy shall be:

- Published as a standalone document on our website
- Summarized clearly in our Terms and Conditions

The following will be included:

- Complaint submission details and links
- Expected timelines
- ADR rights and implications
- CGA's non-mediatory role

8. Player Rights and Grounds for Complaint

Players may raise complaints concerning, but not limited to:

1. Deposit or withdrawal delays/errors
2. Misleading or unfair bonus terms
3. Account closures or restrictions
4. Game malfunction or fairness
5. Responsible gambling breaches
6. Player balance disputes
7. KYC/Verification problems
8. Personal data mishandling
9. Technical issues affecting gameplay
10. AML concerns or fraud
11. Underage gambling
12. Licensing or regulatory breaches

9. Contact Information

For complaint submission or further assistance:

- Email: [Insert Support Email]
- Online Complaint Form: [Insert Form URL]

For CGA regulatory complaints:

- Online form available at [Insert CGA Form URL]

Player Complaint Form

Operator Name: [Insert Operator Name]

Submission Method:

- Online Form
- Email (attach this completed form to [Insert Support Email])

1. Player Information

- Full Name: _____
- Residential Address: _____
- City/Country: _____
- Email Address: _____
- Phone Number (optional): _____
- Account Username/ID (if applicable): _____

2. Complaint Details

- Date of Incident: _____
- Date of Complaint Submission: _____
- Category of Complaint:
 - Deposit Issue
 - Withdrawal Issue
 - Bonus Terms and Conditions
 - Account Closure/Restriction
 - Game Outcome / Error
 - Responsible Gaming Concern
 - Verification / KYC
 - Data Protection
 - Technical Issue

- Other (please specify): _____

- **Detailed Description of the Complaint (please include relevant facts, dates, and interactions):**

3. Supporting Documentation

Please attach any relevant documents (screenshots, emails, receipts, etc.)

Documents Attached:

4. Language Preference for Communication:

- English
- **[Insert Language of Target Market]** (offer to use languages of the restricted GEOs is not recommended)

5. Declaration

I confirm that the information provided in this complaint is accurate and complete to the best of my knowledge.

Signature (if printed): _____

Date: _____