

Player Complaints Policy

This policy establishes the procedures by which the Company receives, investigates, resolves and reports player complaints and disputes. It is fully aligned with Version 1.1 (18 June 2025) of the Curaçao Gaming Authority (CGA) **Player Complaints Policy Guidelines** and with Article 5.3 of the National Ordinance on Games of Chance (*Landsverordening op de Kansspelen*, “LOK”).

1 Policy Overview

The Company is committed to ensuring that every player has access to a **transparent, fair, fast and free** mechanism for resolving complaints.

This policy is an integral part of the Terms & Conditions and is available as a standalone PDF from every page footer and the registration screen.

Acceptance of the Complaints Policy is obtained during account creation via a compulsory tick-box and is reconfirmed whenever material changes are made.

Nothing in this policy limits a player’s statutory rights under Curaçao civil law or their right to seek legal redress.

2. Definitions

Player Interaction: Any written contact initiated by a player to Customer Support (e-mail, chat, webform, social media DM).

Complaint: A written expression of dissatisfaction regarding the Company’s services, decisions, terms or conduct for which the player expects a response. A complaint formally begins once the *Complaint Submission Form* has been filed.

Dispute: A complaint that remains unresolved after the internal process and is escalated to Alternative Dispute Resolution (ADR) or a court of law.

3. Complaint Submission Process

3.1 Complaint Window

Players may file a complaint within six (6) months of the incident which gave rise to the complaint, such as the settlement of a bet, account-related actions, a game malfunction, or any other decision or event by the Company that the player wishes to contest.

3.2 Stages of Resolution

Stage 1 – Customer Support

Stage 2 – Complaint Submission Form

Stage 3 – Final Internal Review

Stage 4 – ADR Escalation

Only the registered player may submit or pursue a complaint; claims cannot be assigned to third parties in line with LOK Art 1.3(c).

3.3 Role of the CGA

- CGA does **not** decide individual complaints but will use aggregated data for supervision.
- Players retain the right to alert the CGA to regulatory breaches or whistle-blowing concerns at any time.

4 Complaint Resolution Process

4.1 Responsible-Gaming Complaints

Matters affecting vulnerable players, self-exclusion or cooling-off must be prioritized:

- Receipt confirmation: **within 48 business hours**.
- Resolution target: **within 5 business days**.
- Extension (operator delay): max **+9 business days** (total 14).
- Extension (awaiting player info): max additional 14 business days.

4.2 All Other Complaints

- Assessment & response: **within 4 weeks**.
- Extension (complex cases): **+4 weeks** with written notice.

5 Alternative Dispute Resolution (ADR)

The Company maintains an agreement with **[ADR Entity Name]**, certified by the CGA.

- ADR services are **free** to players; the operator bears all fees^[1].
- Once ADR concludes, either party may pursue court action, but the same matter may not be resubmitted to a different ADR provider^[1].
- If the player abandons ADR mid-process, the complaint is considered closed unless new evidence emerges.

6 Record-Keeping & Regulatory Reporting

Requirement	Detail	Frequency
Complaints register	Secure database holding all interactions, evidence and decisions	Continuous
CGA Report	Totals, outcomes, categories, ADR referrals, legal actions	15 Jan & 15 Jun each year (first due Jan 2026)
Retention	Unresolved or escalated cases kept 5 years or as per applicable law	
Access	CGA may request records at any time	

7 Terms & Conditions Disclosure

The following text (or a link thereto) appears in the T&C and at client-co.com/complaints:

1. **How to complain** – links to live chat, e-mail, webform.
2. **Information required** – fields listed in §3.2.
3. **Timelines** – RG and standard deadlines (§4).
4. **Player rights** – internal review → ADR → courts; right to contact CGA.
5. **Binding effect of ADR** – explanation of consequences.
6. **ADR contact details** – postal, e-mail, website.
7. **Clarification** – CGA does not adjudicate individual monetary claims^[1].

8 Reasons for Complaint

Players may complain about (non-exhaustive list):

- Deposits / withdrawals - Bonus conditions - Account closure - Game fairness - Responsible gaming - Balance treatment - KYC/AML - Data protection - Technical errors - Fraud - License issues - Unfair terms.

9 Transition & Version Control

This policy supersedes all previous versions and is effective **1 August 2025**. In compliance with Clause 9 of the CGA guidelines, it has been uploaded to the CGA Portal before the 31 July 2025 deadline.

- Version 1.0 – 28 July 2025 – Initial issue.
- Future amendments will be logged in this section and notified to the CGA and to players at least 14 days in advance unless mandated sooner by law.

Appendix A – Complaint Submission Form (Web & PDF)

Fields:

1. Player Name (mandatory)
2. Residential Address & Country (mandatory)
3. Account/Username (mandatory)
4. E-mail & Phone (mandatory)
5. Date of Incident (mandatory)
6. Complaint Category (dropdown)
7. Narrative (free text, 1 000 chars)
8. Attachments (up to 10 MB)
9. Declaration (“I confirm this information is true...”)
10. Consent to ADR referral if unresolved