

CONFIDENTIAL

COMPLAINTS POLICY

REVISION HISTORY

Version Number	Date	Summary of changes	Author
1.0	01/07/2025	New policy drafted	Alper Soylemez

PURPOSE

The purpose of this policy is to ensure that **all customer complaints** are handled:

- Promptly, fairly, and transparently
- In compliance with Curaçao Gaming Authority (CGA) regulations under LOK
- Consistently across the organisation
- With appropriate escalation and record keeping

This policy underpins our commitment to **player protection and regulatory compliance**.

SCOPE

This policy applies to:

- All employees, contractors, and support teams who interact with customers
- All forms of customer contact: email, live chat, phone, social media, and tickets
- All complaints, including but not limited to:
 - Deposit issues
 - Withdrawal issues
 - Bonus terms and conditions
 - Account closures or restrictions
 - Alleged errors or unfairness in game outcomes
 - Responsible gaming issues
 - Treatment of player balances
 - KYC and Verification
 - Data Protection

- Technical or Software issues
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation
- Unfair terms and conditions

POLICY PRINCIPLES

1. Fair Treatment

- Every complaint is taken seriously, regardless of its nature or the customer's status
- No customer shall face retaliation for raising a complaint

2. Transparency

- Customers are kept informed about the progress and outcome of their complaint
- All communications are polite, factual, and non-confrontational

3. Timely Resolution

- Acknowledgement within 24 hours of receipt
- Resolution within 14 days, or updates provided if more time is needed

4. Escalation and ADR

- If a complaint cannot be resolved internally, customers must be directed to the approved ADR provider (CADRE)
- Management approval is required before any ADR referral

5. Confidentiality

- Complaint details and player data are treated as confidential in line with our Privacy Policy and GDPR obligations

6. Record Keeping and Reporting

- All complaints and outcomes are logged in the Complaints Register

- Records are retained for a minimum of 3 years, as required by CGA/LOK
- The Compliance Officer is responsible for reporting patterns or serious issues to management

ROLES AND RESPONSIBILITIES

Role	Responsibility
Customer Support	Receive and log complaints; attempt initial resolution
Head of Customer Support	Oversee complaint handling and ensure timely responses, maintain register
Compliance Officer / MLRO	Monitor compliance, prepare reports
Senior Management	Approve final decisions; authorise ADR referrals if unresolved

COMPLIANCE STATEMENT

This policy is designed to comply with:

- **Curaçao Gaming Authority (CGA) – LOK regulation**
- **Alternative Dispute Resolution (ADR) requirements**
- **Our Licence Terms and Conditions**

Failure to adhere to this policy may result in disciplinary action and/or regulatory breaches.

REVIEW

- This policy is reviewed annually by the Compliance Officer or upon any regulatory change.
- Updates are communicated to all relevant staff.