



Player Complaints PolicyGuideline

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1、 Policy Overview

This **U8 Group** Complaints Policy establishes the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in compliance with Article 5.3 of the *National Ordinance on Games of Chance* (Landsverordening op de kansspelen, LOK).

Players may submit complaints directly to U8 Group's dedicated complaints email: u8complaints@gmail.com

Adherence to this Complaints Policy is considered a requirement under the LOK. Non-compliance will be addressed by the Curaçao Gaming Authority (CGA) through its supervision, monitoring, and enforcement procedures.

This **U8 Group** Complaints Policy guarantees players access to a simple and effective complaints and dispute resolution process through **U8 Group**, including a free Alternative Dispute Resolution (ADR) service that prioritizes quality and independence.

Pursuant to Article 5.3 of the LOK, further rules, policies, and guidelines regarding complaints and ADR processes may be established by **U8 Group**.

Key Requirements:

- ***U8 Group's** player complaints policy must be explicitly included or referenced in the operator's Terms and Conditions. It must detail all stages of complaint resolution (Article 3.2).*
- ***U8 Group's** may, at their discretion, publish the policy as a "standalone" document and provide a link on their website's homepage and/or registration page.*
- ***U8 Group's** may, at their discretion and in compliance with applicable private law, require players to explicitly acknowledge acceptance of the Complaints Policy via checkboxes, pop-ups, or email.*

- ***U8 Group's** may, at their discretion, make acceptance of the Complaints Policy part of **U8 Group's** registration process.*

This **U8 Group's** Complaints Policy is based on the regulatory requirements of the LOK. It does not affect or replace applicable private law rules, including but not limited to the provisions of Book 6 of the **Curaçao Civil Code** regarding general terms and conditions. **U8 Group** must independently ensure compliance with all relevant civil law obligations beyond this policy. **U8 Group** should seek appropriate legal advice to ensure their complaints procedures and Terms and Conditions meet private law requirements.

2、 Definitions

2.1 Player Interaction

Written communication initiated by a player and directed to the operator's customer support team. Includes general inquiries, feedback, or requests for information, assistance, or clarification.

2.2 Complaint

A written expression of dissatisfaction by a player regarding the operator's services, decisions, terms, or actions, indicating the player's expectation of a response or resolution. For reporting purposes (Article 6), a complaint is defined as a player submitting a complaint form (Article 3.2.3) and/or the complaint being escalated to ADR.

2.3 Dispute

A complaint that remains unresolved to the player's satisfaction through internal procedures and is escalated, either within the organization or to an

independent third party (e.g., ADR provider or court).

2.4 Urgent Complaint

Defined as complaints that may cause irreversible harm, including:

- Participation of minors in gambling
- Active self-excluded player accounts
- Suspected misappropriation of funds

Such complaints must initiate a resolution process within 24 hours.

3、 Complaint Submission Process

3.1 Complaint Window

1. This Complaints Policy applies to all players of LOK-licensed operators, effective from the date of license issuance; for NOOGH-registered operators, it takes effect upon obtaining a green or orange dynamic seal.
2. Players may submit complaints free of charge within six months of bet settlement or the occurrence of the complaint-triggering event.
3. For P2P (e.g., poker) or fixed-odds bets placed in advance, the six-month period starts from bet settlement or the conclusion of the specific event, not the bet placement time.
4. For complaints involving live sports bets, players must be informed that while complaints may be submitted within six months, investigations relying on specific data (which may become unavailable due to the nature of live bets) may require prompt action.

3.2 Complaint Resolution Stages/Escalation

1. Only registered players may file complaints. Article 1.3(c) of the LOK prohibits players from selling, donating, leasing, pledging, or mortgaging any claims against CGA gaming licensees.
2. Operators must first provide customer support via email and/or online chat.
3. An official complaint submission form must be provided to players:
 - a. The form may be downloadable (fillable and uploadable via email) and/or an online form.
 - b. The form must include at least:

- i. Complainant's name, address, and residence
 - ii. Complainant's account ID (if applicable)
 - iii. Date of complaint and disputed event
 - iv. Description of the disputed conduct (with predefined category options, if applicable)
- c. The form must be available in English and the language of the website/domain.
- d. Operators may request supporting documentation. Any additional information requested must be reasonable in the context of complaint resolution.
- 4. Operators must offer ADR options as per Article 5.
- 5. Operators may not restrict players' right to pursue legal action, except by mutual agreement under ADR terms (Article 5).

3.3 Role of the CGA

- 1. Operators must clearly define the CGA's role in their Terms and Conditions.
- 2. The CGA does not resolve or decide on player complaints related to gambling transactions on operator websites.
- 3. Decisions by operators and/or ADR providers are not subject to CGA review or overturning unless mishandled.
- 4. Notwithstanding the above, operators may not restrict players from directly contacting the CGA regarding matters such as misconduct, license violations, or whistleblowing.
- 5. While the CGA does not mediate individual disputes, it may use such information to support supervision and enforcement actions.

4、 Complaint Resolution Process

4.1 Timeline: Responsible Gambling-Related Complaints

Complaints related to responsible gambling (e.g., involving vulnerable players, self-exclusion, or cooling-off periods) must be prioritized due to potential impacts on player well-being. Operators must resolve such cases within five business days.

Within two days of receiving a complaint, operators must:

- Acknowledge receipt in writing.
- Explain the handling process.
- Provide an estimated resolution timeline.

If additional time is needed, players must be notified, with delays not exceeding two weeks. Delays caused by player unresponsiveness may extend the resolution period by up to two additional weeks.

4.2 Timeline: All Other Complaint Types

Operators must assess and respond to complaints within four weeks. This may be extended by another four weeks with prior written notice if complexity or insufficient information warrants it.

Within one week of receiving a complaint, operators must:

- Acknowledge receipt in writing.
- Explain the handling process.
- Provide an estimated resolution timeline.

4.3 Response and Resolution

Players will always receive a final written decision, including:

1. A reasoned assessment of the outcome/solution, with supporting evidence if applicable.
2. Detailed reasons if the complaint is not processed. If additional information is required, operators must request it within the initial four-week period. Failure to provide such information may result in complaint rejection.
3. If unsatisfied, players must be informed of their right to escalate the matter to an independent ADR entity.

4.4 Artificial Intelligence (AI)

AI may be used under this Complaints Policy, subject to:

1. Human handling of responsible gambling-related complaints (Article 4.1).
2. Human handling of complaints reasonably deemed complex.
3. Monitoring of AI records to ensure consistency and reasonableness in resolutions.

5、 Alternative Dispute Resolution (ADR)

To comply with LOK licensing conditions, each licensed operator must provide players with access to an independent ADR service per the ADR Policy.

Key Requirements:

1. Full ADR process details must be included in the operator's Terms and Conditions.
2. Within one month of the CGA publishing its certified ADR provider list, operators must upload agreements with at least one CGA-certified ADR entity to the CGA portal.
3. If a complaint remains unresolved internally, players may escalate it free of charge to an independent ADR provider. Operators bear all ADR costs.
4. Once the ADR process concludes, neither party may refer the matter to another ADR entity.
5. Players who withdraw from an initiated ADR process forfeit future rights to resubmit the dispute.
6. ADR decisions are binding on operators, who must execute them within 10 business days. A public database of anonymized ADR rulings will be maintained.
7. ADR provision is mandatory. Operators may set ADR parameters (e.g., pre-litigation requirements, binding outcomes for players, or minimum claim thresholds) but must seek legal advice to ensure compliance with civil law. The CGA will assess the reasonableness of such measures case-by-case.

6、 Record-Keeping and Reporting

Operators must:

1. Submit reports to the CGA on January 15 and June 15, covering complaints submitted via the complaint form since the last reporting period. The first report is due in January 2026.
2. Reports must summarize:
 - a. Total complaints received.
 - b. Total resolved complaints (upheld/rejected).
 - c. Pending/unresolved complaints.
 - d. Complaints by category.
 - e. Complaints referred to ADR.
 - f. Complaints escalated to legal action, with details.
3. Ensure transparency and compliance in ADR decisions and regulatory updates.
4. ADR providers have separate reporting requirements per the CGA's *ADR Policy*.

5. Retain records of unresolved complaints and those escalated to ADR or legal proceedings for five years (or shorter if required by data protection or other laws).
6. Grant the CGA access to complaint records upon request.

The complaints procedure must be visible and accessible on the operator's website as a standalone link or document and outlined in the Terms and Conditions.

Minimum required information includes:

1. Customer support contact details.
2. Instructions for submitting complaints, including links to online forms or downloadable PDFs/Word documents.
3. Response and resolution timelines.
4. Player rights, including access to ADR and regulatory escalation.
5. Potential consequences of ADR decisions and their impact on further legal recourse.
6. ADR process and player rights.
7. ADR provider contact information.
8. A clear statement that the CGA does not mediate individual disputes but may be contacted for suspected regulatory violations.

7、 Terms and Conditions

The complaints procedure must be visible and accessible on the operator's website as a standalone link or document and outlined in the Terms and Conditions.

Minimum required information includes:

1. Customer support contact details.
2. Instructions for submitting complaints, including links to online forms or downloadable PDFs/Word documents.
3. Response and resolution timelines.
4. Player rights, including access to ADR and regulatory escalation.
5. Potential consequences of ADR decisions and their impact on further legal recourse.
6. ADR process and player rights.
7. ADR provider contact information.
8. A clear statement that the CGA does not mediate individual disputes but may be contacted for suspected regulatory violations.

8、 Grounds for Complaints

Players may complain about any aspect of their relationship with the operator or events related to games of chance, including but not limited to:

1. Deposit issues.
2. Withdrawal issues.
3. Bonus Terms and Conditions.
4. Account closures/restrictions.
5. Allegedly unfair or erroneous game outcomes.
6. Responsible gambling concerns.
7. Player balance handling.
8. KYC and verification.
9. Data protection.
10. Technical or software issues.
11. Anti-money laundering concerns.
12. Minor participation.
13. Game fraud.
14. Fraudulent behavior.
15. Licensing or regulatory issues.

9、 Violations and Penalties

This Complaints Policy ensures fair, transparent, and efficient dispute resolution. The Curaçao Gaming Authority (CGA) may impose penalties for violations.

1. Player Abuse of Complaints

- Verified malicious complaints may result in account suspension.
- An abusive complainant list will be shared with the CGA.

2. Penalty Standards

- *Minor Abuse* (e.g., duplicate resolved complaints):
 - First offense: Written warning.
 - Second offense: 14-day complaint channel suspension.
 - Third offense: Permanent complaint channel closure (other account functions unaffected).
- *Moderate Abuse* (e.g., falsified evidence):
 - 30-day account fund freeze.
 - Reimbursement of investigation costs (up to \$500).
 - Internal monitoring list inclusion.
- *Severe Abuse* (e.g., syndicated fraud, identity theft):
 - Permanent account ban.
 - CGA industry-wide blacklisting.

- Legal action reserved.

3. Appeal Mechanism

- Players may, within 15 business days of penalty notice:
 - Submit a written appeal (with new evidence).
 - Request third-party ADR review (at their cost).
 - Escalate to the CGA (for procedural violations only).

4. Anti-Abuse Safeguards

- Operators must provide full evidence chains to penalize players.
- High complaint frequency alone does not justify penalties.
- Penalty records must be retained for at least three years.

5. General Terms

- Penalty notices must cite specific violated clauses.
- Major penalties (e.g., account bans) require 7-day advance notice.
- Either party may request an online hearing (CGA-supervised).

6. Penalty Disclosure

- Player violations are shared industry-wide (anonymized).