

Player Complaints Policy

Version 1.0 – June 2025

Company: TTM Gaming B.V.

Website: siii.com



1. Purpose

This policy outlines the procedure for players of siii.com to submit complaints and escalate disputes regarding any aspect of their relationship with TTM Gaming B.V. The goal is to ensure a transparent, fair, and timely complaints process in line with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the guidelines of the Curaçao Gaming Authority (CGA).

2. Definitions

Complaint: A written expression of dissatisfaction regarding the operator's services or conduct.

Dispute: A complaint that remains unresolved after completion of the internal process and is escalated to an ADR (Alternative Dispute Resolution) entity.

Player Interaction: Any written communication initiated by a player via live chat or email.

3. How to Submit a Complaint

Players may file a complaint using any of the following methods:

- Email: complaints@siii.com
- Live Chat (on the website)
- Online Complaint Submission Form: Available under the "Contact Us" or "Responsible Gaming" section of siii.com

The complaint must include:

- Full name and registered email address
- Account number or username
- Date of the incident or issue
- Description of the complaint
- Supporting documents if applicable

Complaints must be submitted within 6 months of the incident or bet settlement. For poker or future bets, the window starts upon the completion of the event.

4. Complaint Review Process

4.1 Initial Response

- A written acknowledgment will be sent within 2 business days
- A case reference number will be assigned
- Players will be informed of the expected resolution timeline

4.2 Resolution Timelines

- Responsible Gaming-related complaints: Resolved within 5 business days
- All other complaints: Resolved within 4 weeks

- If additional information is needed, the player will be notified in writing
- One-time extension (max 4 additional weeks) may apply for complex cases

4.3 Final Response

A final written decision will be provided, including:

- Explanation of outcome
- Supporting evidence (if applicable)
- Right to escalate to ADR if not satisfied

5. Escalation to ADR (Alternative Dispute Resolution)

If the complaint remains unresolved, players may escalate the matter to an independent ADR provider.

- ADR is free of charge to the player
- TTM Gaming B.V. bears all ADR-related costs
- The ADR provider will make a final, independent decision on the dispute

Contact details and links to the approved ADR provider will be included in the Terms and Conditions and Complaints section on the website.

Once ADR is completed, the decision cannot be re-submitted or re-litigated under another ADR entity.

6. Important Notes

- Complaints can only be made by the registered player — not a third party
- Use of AI for complaint handling is restricted:
 - Complex or Responsible Gaming complaints will always be handled by a human
- All complaint records will be kept for a minimum of 5 years

7. CGA Role and Regulatory Contact

- The CGA does not mediate individual disputes or gambling outcomes
- However, players may contact the CGA to report:
 - Breach of license conditions
 - Regulatory misconduct
 - Whistleblowing complaints

8. Transparency and T&Cs Disclosure

This policy is available:

- On siii.com as a standalone document (under “Legal” or “Help” section)
- Within the Terms and Conditions, including:
- Submission methods
- Timelines
- ADR process and rights
- Link to CGA disclaimer

9. Reporting to CGA

TTM Gaming B.V. submits complaint reports twice per year (January 15 and June 15), including:

- Number of complaints received and resolved
- Complaints by category
- Number escalated to ADR
- Any legal disputes

10. Reasons for Complaint May Include:

- Deposit or withdrawal delays
- Bonus conditions
- Account suspension or closure
- Suspected errors or unfair outcomes
- KYC or AML-related delays
- Responsible Gaming concerns
- Breach of Terms & Conditions
- Regulatory or license-related complaints