

Poligon Entertainment N.V– Player Complaints Policy

Version: 1.0

Effective Date: 30.07.2025

Owner: Poligon Entertainment N.V

This policy sets out how Poligon Entertainment N.V receives, assesses, resolves and reports player complaints and disputes in line with the Curaçao LOK (Article 5.3) and the CGA Player Complaints Policy Guidelines (v1.1, 18 June 2025).



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1. Policy Overview & Scope

This Player Complaints Policy (the “Policy”) governs how Poligon Entertainment N.V. (the “Operator”) handles player complaints and disputes. It is binding on the Operator and forms part of the Operator’s licensing obligations under the Landsverordening op de Kansspelen (LOK). The Policy aligns with Article 5.3 LOK and the Curacao Gaming Authority (CGA) Player Complaints Policy Guidelines (v1.1).

Scope: This Policy applies to all players of Poligon Entertainment N.V.’s websites from the date the Operator’s Curaçao license is issued. The Policy is self-contained and publicly available.

2. Definitions

ADR – Independent Alternative Dispute Resolution provider certified/recognized by the CGA.

Business Day – A day other than Saturday, Sunday, or a public holiday in Curaçao.

CGA – Curaçao Gaming Authority.

Complaint – A Complaint is a written expression of dissatisfaction by a player relating to the Operator’s services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution. For the purpose of Reporting requirements (Clause 6) a complaint is when a Complaint Submission Form (Clause 3.2 paragraph 3) has been submitted by the player to the Operator and/or a complaint has been escalated to ADR.

Dispute – A complaint that has not been resolved to the player’s satisfaction through the internal complaints process and has been escalated, either within the organization or to an independent third party (e.g. an ADR provider or court of law).

Player Interaction – Any written communication initiated by a player and directed to the Operator’s customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

Responsible Gaming Complaint – Any complaint concerning vulnerable players, self-exclusion/cooling-off access or application, or related breaches that may affect player well-being.

3. Governance & Responsibilities

- Policy Owner: Poligon Entertainment N.V.
- First-line Handling: Customer Support receives and triages complaints; escalates to the Complaints Officer where necessary.
- Decision Authority: Complaints Officer / Compliance; RG complaints involve RG Lead.

- Oversight: Compliance monitors SLA adherence, quality and reporting; Legal advises on civil law/ADR implications.
- Non-retaliation: Players will not be treated unfavourably for filing a complaint in good faith.
- Ensure that complaint records, outcomes, and ADR correspondence are available to the CGA upon request.
- Ensure that internal handling is impartial, timely, and auditable to demonstrate compliance with LOK Art. 5.3 supervision requirements.

4. Complaint Submission Process

4.1 Eligibility & Window

- Only the registered player may file a complaint. Claims are non-assignable per LOK (no sale/lease/pledge of claims).
- Deadline: within six (6) months of bet settlement or the incident. For P2P/ante-post, timer starts at settlement/conclusion. In-running issues should be raised promptly due to time-sensitive data.

4.2 Channels

- Live Chat and/or Email: support@superbetin/betsat/turkbet/turkishvegas.com
- Complaint Submission Form: online submission and downloadable PDF/Word; available in English and in the language of the accessed domain.

4.3 Required Information (Form Minimum)

- Player's full name, address, place of residence.
- Account number/username (if applicable).
- Date of complaint and date/time of disputed event.
- Description of the conduct being disputed; select category (Appendix B).
- Reasonable supporting documents (e.g., screenshots, transaction IDs).

4.4 CGA's Role

- The CGA does not resolve individual transactional complaints.
- Players may contact the CGA regarding malpractice, licence breaches, or whistleblowing. The CGA may use information for supervisory/enforcement actions.

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5. Resolution Process & Timelines

5.1 Responsible Gaming (RG) Complaints

- Prioritised. Acknowledge within two (2) Business Days; aim to resolve within five (5) Business Days.
- If more time is required, inform the player. Delay may not exceed two (2) weeks; if awaiting player information, one additional two-week period is allowed.

5.2 All Other Complaints

- Acknowledge within one (1) week; assess and respond within four (4) weeks.
- One-time extension of up to four (4) additional weeks for complex/insufficient information cases, with written notice to the player.

5.3 Outcomes & Closure

- Reasoned final assessment with supporting evidence where appropriate; or
- Explained decision not to handle the complaint (with reasons). If additional information was reasonably required, it must have been requested within the initial four-week period; and/or
- Escalation guidance: if unsatisfied, the player may escalate to an independent ADR entity (Section 6).

5.4 Use of Artificial Intelligence (AI)

- AI may assist routine complaint handling. RG and complex complaints must be handled by humans.
- Monitor AI outputs for accuracy, fairness, and consistency; maintain audit logs.

5.5 Abusive/Vexatious Behaviour

- The Operator may set reasonable parameters to prevent abuse while ensuring fairness (e.g., consolidating repetitive submissions). Any limits will be proportionate and documented.

6. Alternative Dispute Resolution (ADR)

- Maintain an agreement with at least one CGA-certified ADR provider; upload agreement to the CGA Portal within one month of provider list publication.
- ADR is free for players; the Operator bears all costs.
- Once concluded, the ADR process cannot be recommenced with another ADR entity.



- If the player drops out after ADR has begun, the dispute should not be re-opened later.
- ADR parameters to prevent abuse (e.g., minimum claim thresholds, binding nature, pre-litigation requirement) will be evaluated carefully with legal advice and in line with civil law; sensitive matters (e.g., self-exclusion admission) must be taken seriously regardless of monetary value.
- Provision of ADR services is mandatory under the LOK.
- The Operator recognises that certain disputes, such as those involving admission of a self-excluded person, must be addressed irrespective of claim value.

7. Record-Keeping & Regulatory Reporting

- Reporting: Submit complaints reports to the CGA on 15 January and 15 June each year (first report due January 2026).
- Content: totals; settled (upheld/rejected); pending; by category; sent to ADR; subject to legal action.
- Retention: keep unresolved and ADR/legal complaints for the lesser of five (5) years or the applicable statutory/data-protection period.
- Disclosure: provide records to the CGA upon request.

8. Accessibility & Transparency

This Policy is published as a standalone document on the Operator's websites.

The Terms and Conditions and this Policy will together disclose at least:

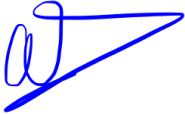
- Contact information for customer service;
- Instructions for submitting a complaint;
- Applicable timelines for acknowledgement and resolution;
- Player rights to ADR and regulatory escalation; and
- A clear statement that the CGA does not mediate individual disputes.

9. Data Protection & Confidentiality

- Handle complaint data in accordance with applicable data-protection laws and the Operator's privacy policy.
- Limit access to a need-to-know basis; store securely; redact third-party data as required.
- Share information with ADR/CGA or law-enforcement as legally required.

10. Review, Version Control & Effective Date

- Review Cycle: at least annually or upon regulatory change.
- Versioning: maintain version history and change log.
- Effective Date: see cover page.



Andrea Engelhardt

eMagnus Curacao B.V.

Managing Director

10/30/2025



Appendix A – Complaint Submission Form (Template)

Poligon Entertainment N.V. Complaint Submission Form

Complete all sections and submit via the online form or email.

A1. Full Name	
A2. Address & Place of Residence	
A3. Account Number / Username	
A4. Email & Phone	
A5. Date of Complaint	
A6. Date/Time of Disputed Event	
A7. Category (see Appendix B)	
A8. Description of Issue (include relevant URLs, game IDs, bet IDs, screenshots)	

Attachments: [List filenames] | I confirm the information is true and accurate.

Signature/Date: _____



Appendix B – Complaint Categories

- Deposits
- Withdrawals
- Bonus Terms & Promotions
- Account Closure / Restrictions
- Game Fairness / Outcomes
- Responsible Gaming (Self-exclusion, Vulnerable Players)
- Player Balances / Wallet
- KYC / Verification
- Data Protection / Privacy
- Technical / Software
- AML Concerns
- Minors / Access Controls
- Fraudulent Games / Practices
- Licence / Regulation
- Unfair Terms

Appendix C – SLA at a Glance

Complaint Type	Acknowledge	Target Resolution	Permissible Extensions
Responsible Gaming	≤ 2 Business Days	≤ 5 Business Days	Up to 2 weeks (one extra 2-week period if awaiting player info)
All Other Complaints	≤ 1 week	≤ 4 weeks	One additional 4-week extension with written notice
ADR Escalation	—	ADR timelines apply	As per ADR provider rules
Reporting	—	15 Jan & 15 Jun	—

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Appendix E – Acknowledgement & Final Determination Templates

E1. Acknowledgement (Responsible Gaming – send within 2 Business Days)

Subject: We've received your Responsible Gaming complaint [Ref: #####]

Hello [Player Name],

Thank you for contacting [Brand Name]. We have received your complaint concerning [brief issue]. We will prioritise this matter and aim to provide a final response within five (5) Business Days. If we require more time, we will inform you (maximum two weeks; an extra two weeks only if we await your information).

Regards,
[Brand Name] Complaints Team

E2. Acknowledgement (All Other Complaints – send within 1 week)

Subject: We've received your complaint [Ref: #####]

Hello [Player Name],

Thanks for your message. We have registered your complaint concerning [brief issue]. We will investigate and aim to provide a final response within four (4) weeks. If the matter is complex or information is missing, we may extend this timeline once by up to four (4) weeks and will notify you in writing.

Regards,
[Brand Name] Complaints Team

E3. Final Determination (All Complaints)

Subject: Final determination – Complaint [Ref: #####]

Hello [Player Name],

We have completed our review of your complaint regarding [summary]. Our decision is: [Outcome].

Reasoning: [clear, reasoned explanation with references to evidence/terms].

If you remain unsatisfied, you may refer the matter to our CGA-certified ADR provider at no cost to you: [ADR Provider Details]. Please note that once ADR is completed, it cannot be recommenced with another ADR entity. You may also seek legal remedies independently, as



permitted by law.

Regards,

[Brand Name] Complaints Officer

A handwritten signature in blue ink, appearing to be a stylized 'W' or 'N', located in the bottom right corner of the page.