

Player Complaints Policy

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1. Policy Overview

Arena Sports Entertainment N.V.'s Complaints Policy outlines the framework for managing player complaints and disputes, ensuring transparent, fair, and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, "LOK").

Adherence to this Complaints Policy by Arena Sports Entertainment N.V is considered a requirement under the LOK, and failure to comply will be addressed by the Curacao Gaming Authority (CGA) in accordance with its supervision, monitoring and enforcement procedures.

The Complaints Policy guarantees players access to a straightforward and effective complaint and dispute resolution process,

This Complaints Policy is based on regulatory requirements under the LOK. It does not affect or override the applicable rules of private law, including, but not limited to, the provisions of Book 6 of the Civil Code of Curaçao concerning general terms and conditions.

Arena Sports Entertainment N.V remains responsible for ensuring compliance with all relevant civil law obligations independently of this policy and will seek appropriate legal advice to ensure that our complaints procedures and terms and conditions conform to private law requirements.

2. Definitions

2.1 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.

2.2 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, a complaint is when a Complaint Submission Form has been submitted by the player to the operator.

2.3 Dispute

A complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated.

3. Complaint Submission Process

3.1 Complaint Window

- This Complaints Policy applies to all players.

- Players may lodge a complaint free of charge at any time up to six months after the settlement of the bet or the incident about which they are making a complaint.
- In the case of P2P (such as poker) or ante post fixed odds betting, the six-month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager.
- In the case of complaints about in-running sports betting, customers must be advised that while they may submit a complaint within six months, prompt action may be necessary if the investigation may depend on data specific to the complaint which — due to the nature of in-running betting — may no longer be available after a short period, insofar as the operator cannot reasonably be expected to preserve such data any longer.

3.2 Stages/Escalation of Complaint Resolution

- Complaints can only be made by the registered player. Article 1.3 section c of the LOK mandates that a player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the holder of a gaming license from the CGA.
- In the first instance Arena Sports Entertainment N.V offers customer support via email and/or live chat for immediate complaint resolution.
- An official Complaint Submission Form will be available to the player if immediate resolution via email and/or live chat is not reached. This form will be a downloadable form that can be completed and emailed by the player. The mandatory fields for the complaint submission form are as below:
 - Complainant's name, address, and place of residence.
 - Complainant's account number (if applicable).
 - Date of the complaint and date of the disputed event.
 - Description of the conduct being disputed.
- The form is available in English and Turkish.
- It may be that Arena Sports Entertainment N.V requests supporting documentation from the player as part of the complaint. Any additional information or documentation requested by Arena Sports Entertainment N.V must be a reasonable in the context of complaint resolution.
- Arena Sports Entertainment N.V will not restrict the rights of the player him/herself to take legal action.

3.3 Role of the Curacao Gaming Authority (CGA)

- The CGA will not resolve or make decisions on any player complaints regarding gambling-related transactions with Arena Sports Entertainment N.V.
- Unless deemed to be inadequately handled, the decisions made by the Arena Sports Entertainment N.V will not be subject to reviewing and/or overturning by the CGA.
- Notwithstanding the points above Arena Sports Entertainment N.V will not restrict the player's ability to contact the CGA directly with regard to matters including but not limited to malpractice, breach of license conditions or whistleblowing.
- While the CGA does not mediate in individual disputes it will use the information to support its supervisory and enforcement actions.

4. Complaint Resolution Process

4.1 Timeline: Responsible Gaming Complaints

Complaints related to responsible gaming will be prioritized due to potential impacts on player well-being. Complaints will be categorized as related to responsible gaming in any case when it regards targeting of Vulnerable Players, the availability and/or timely implementation of self-exclusion and/or cooling-off and the mandated consequences therein as outlined in the Responsible Gaming policy.

Arena Sports Entertainment N.V will where possible resolve these cases within five business days.

Within two days of receiving a complaint, Arena Sports Entertainment N.V will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

If more time is needed by Arena Sports Entertainment N.V to make a reasonable and informed decision, players will be informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.

4.2 Timeline: All Other Complaint Types

Arena Sports Entertainment N.V will assess and respond to complaints within four weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the player.

Within one week of receiving a complaint, Arena Sports Entertainment N.V will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

4.3 Response and Resolution

A player will always receive a final determination of their complaint in writing.

The response will be either:

- A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
- Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, Arena Sports Entertainment N.V will have requested this information within the initial four-week time period. Should the complainant not provide the necessary information within that time period, Arena Sports Entertainment N.V may reject the complaint.

4.4 Artificial Intelligence (AI)

The use of AI is permissible under this Complaints Policy Guideline subject to the following terms:

- Once a player complaint has been identified as pertaining to Responsible Gaming, communications with the player will be conducted by a human, not AI.
- Complaints that can be reasonably considered as complex will be dealt with by a human, not AI.
- The AI records will be monitored to ensure that they are reasonable in their solutions/recommendations and consistent across players with like-for-like complaints.

5. Record-Keeping and Reporting

Arena Sports Entertainment N.V will:

- Submit reports to the CGA on January 15th and June 15th based on complaints submitted to the operator since the previous reporting period by players using the Complaints Submission Form.
- The report will summarise the following:
 - Total number of complaints made.
 - Total number of settled complaints (upheld and rejected).
 - Number of pending or unresolved complaints.
 - Number of complaints by category.
 - Number and detail of complaints for which a player has taken legal action.
- Maintain records of unresolved complaints and/or complaints that have been escalated or resulted in legal proceedings will be kept for the lesser of five years or the relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.

6. Terms and Conditions

The Complaints Policy is visible and accessible on the Arena Sports Entertainment N.V's website.

7. Reasons for Complaint

The player has the right to make a complaint regarding any part of their relationship with the Arena Sports Entertainment N.V, or any incident related to their participation in a game of chance. This includes (but is 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

8. Contact Us

In the first instance Arena Sports Entertainment N.V offers customer support for complaints via email and/or live chat for immediate complaint resolution.

Live Chat: [Cyprussportingclubs.com](https://cyprussportingclubs.com)

Email : mh@cyprussportingclubs.com

Tel : (+90) 392 815 1515

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Managing Director

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