

PLAYER COMPLAINTS POLICY

Issued by: CUPWIN B.V.

Version 2.0

Effective Date: 29.07.2025

Licensed and Regulated by the Curaçao Gaming Authority (CGA)

1. Introduction

CUPWIN B.V.. ('Operator', 'Company') is committed to providing a **safe, fair, and responsible gaming environment**.

Our goal is to ensure that online gaming remains an enjoyable form of entertainment while preventing gambling-related harm and protecting vulnerable individuals.

This policy outlines the framework for managing player complaints and disputes, ensuring a 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")..

This policy is aligned with the **Player Complaints Policy Guidelines** issued by the **Curaçao Gaming Authority (CGA)** and reflects the company's ongoing commitment to regulatory compliance and player welfare.

This policy guarantees players access to a straightforward and effective complaint and dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

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 or a message to the designated contacts (e.g. live chat, email, etc.) has been submitted by the player to the operator and/or a complaint has been escalated to ADR.

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

2. Submitting a Complaint

2.1 Complaint Window

Players may submit a complaint **free of charge within six (6) months** of the relevant incident or the settlement of the disputed bet.

Special cases:

- For **P2P games** (e.g. poker) or **ante post fixed odds betting**, the six-month period begins **after the bet settlement or event conclusion**, not at the wager placement.
- For **in-running (live) sports betting**, complaints can be made within six months; however, **prompt submission** is advised, as data needed for review may no longer be available later.

2.2 Who Can Submit

Only the **registered player** may file a complaint.

Under **Article 1.3(c) of the LOK**, a player cannot sell, transfer, rent, or pledge any claim against the licensed operator.

2.3 How to Submit

Players may file a complaint by:

- Contacting **Customer Support** via email or live chat; or
- Completing the **Official Complaint Submission Form**, available online or as a downloadable document.

The form includes:

1. Player's full name, address, and country of residence;
2. Account number (if applicable);
3. Date of the complaint and the disputed event;
4. Description of the issue.

The form is available in **English** and in the **language of the player's domain**.

3. Complaint Resolution Process

3.1 Responsible Gaming Complaints

Complaints related to responsible gaming will be **prioritized**.

- Acknowledgment within **2 business days**.
- Resolution within **5 business days**, unless extended by no more than two additional weeks.

3.2 Other Complaints

- Acknowledgment within **1 week**.
- Resolution within **4 weeks**, extendable once by up to **4 additional weeks** if necessary.

3.3 Final Response

The player will receive a **written decision** including:

- The final outcome and reasoning; or
- Explanation for non-processing (e.g., missing information).

If unsatisfied, the player will be advised of their right to escalate to an **independent ADR provider**.

4. Use of Artificial Intelligence (AI)

AI systems shall not be used to assist in complaint handling. All complaints must be processed manually by the Operator's designated persons

5. Alternative Dispute Resolution (ADR)

If the complaint cannot be resolved internally, the player may refer the case to an **independent ADR provider, free of charge**.

- The operator bears all ADR costs.
- Once concluded, ADR outcomes are binding.
- Players retain the right to pursue **legal action** independently.

Full ADR details and contact information are available in the **Terms and Conditions** and on the website.

6. Role of the Curaçao Gaming Authority (CGA)

The **CGA** does not mediate in individual player disputes.

However, players may contact the CGA if they believe the operator has:

- Breached licensing conditions;
- Engaged in misconduct;
- Violated responsible gaming or player protection rules.

Complaint data may be used by the CGA for **supervisory and enforcement** actions.

7. Record Keeping and Reporting

The operator maintains detailed records of all complaints and resolutions.

Reports are submitted to the CGA twice yearly — **January 15** and **June 15** — summarizing:

- Number of complaints received and resolved;
- Pending or ADR-referred complaints;
- Legal actions taken.

Records are retained for **five (5) years** or as required by law.

8. Player Rights

Players have the right to:

- Submit complaints **free of charge**;
- Receive acknowledgment and a final written response within regulated timelines;
- Escalate unresolved complaints to an **independent ADR provider**;
- Contact the **CGA** for regulatory issues or misconduct.

All complaints are handled **confidentially, fairly, and in compliance with data protection laws**.

9. Reasons for Complaint

Players may submit complaints about any aspect of their relationship with the operator, including but not limited to:

1. Deposits or withdrawals
2. Bonus terms and conditions
3. Account closure or restriction
4. Alleged game errors or unfair outcomes
5. Responsible gaming issues
6. Player balances and payments
7. KYC and verification
8. Data protection or privacy
9. Technical issues
10. AML or fraud concerns
11. Access by minors
12. Fraudulent games
13. Fraudulent practices

- 14. License or regulatory matters
 - 15. Unfair terms and conditions
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10. Policy Accessibility

This **Player Complaints Policy** is:

- Published on the operator's website as a **standalone document**;
- Linked from the **Terms and Conditions** page;
- Available in English and other supported languages.

By registering or using the website, players acknowledge they have read and accepted this Policy.

11. Contact Information

For complaints, responsible gaming assistance, or any inquiries:

support@winebet.com

winebet.com

CUPWIN B.V., Curaçao

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12. Version History

Version No.	Effective dates
2	29.07.2025 (current)
1	01.03.2025