

Betrust Entertainment – Player Complaints Policy

(Compliance with the Curaçao Gaming Authority Guideline, Version 1.1 – 18 June 2025)

1. Policy Overview

This Player Complaints Policy explains how **Betrust Entertainment** manages complaints and disputes submitted by its players. The policy ensures that all concerns are handled fairly, transparently, and efficiently, in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and with all requirements issued by the Curaçao Gaming Authority (CGA).

This Complaints Policy must be included or referenced in the Betrust Entertainment Terms and Conditions. It may also be published as a standalone document on the website.

Betrust Entertainment guarantees players access to a straightforward complaint process and to a free, independent Alternative Dispute Resolution (ADR) mechanism.

This policy does not replace any obligations under applicable civil law. Betrust Entertainment will seek legal advice when necessary to ensure full compliance with private law.

2. Definitions

2.1 Player Interaction

Any written communication initiated by a player to the Betrust Entertainment customer support team. This includes questions, requests for assistance, feedback, or general inquiries.

2.2 Complaint

A written expression of dissatisfaction relating to Betrust Entertainment services, decisions, terms, or conduct, where the player expects a response or resolution. For reporting purposes, a complaint exists once the official Complaint Submission Form has been submitted or when a complaint is escalated to ADR.

2.3 Dispute

A complaint that has not been resolved to the player's satisfaction through the internal processes of Betrust Entertainment and which has been escalated internally or to an independent ADR provider or court.

3. Complaint Submission Process

3.1 Complaint Window

1. Players may submit a complaint to Betrusted Entertainment at any time within six months from the settlement of the bet or the incident concerned.
2. For peer to peer games or ante post betting, the six month period begins once the event is completed.
3. For in running sports betting, players may still submit a complaint within six months, but certain technical data may no longer be available after a short period.

3.2 Stages of Complaint Resolution

1. Only the registered player may submit a complaint. Claims cannot be transferred or assigned.
2. Betrusted Entertainment provides customer support via email and or live chat.
3. Betrusted Entertainment will provide a Complaint Submission Form containing at minimum:
 - Player name, address, and country of residence
 - Account number
 - Dates of the complaint and disputed event
 - Description of the issue and category selection if applicable
4. The form will be available in English and in the language used on the Betrusted Entertainment website.
5. Supporting documentation may be requested if reasonably required.
6. Betrusted Entertainment will not restrict the player's right to pursue legal action.

3.3 Role of the CGA

- The CGA does not resolve individual gambling related complaints.
- Players may contact the CGA regarding regulatory breaches, malpractice, or whistleblowing.
- Unless mishandled, decisions made by Betrusted Entertainment or the ADR provider will not be reviewed or overturned by the CGA.
- Betrusted Entertainment will clearly describe the CGA's role in its Terms and Conditions.

4. Complaint Resolution Process

4.1 Responsible Gaming Complaints

Betrust Entertainment prioritizes complaints involving responsible gaming, including issues related to vulnerable players, self exclusion, and cooling off.

Timeline:

- Acknowledgment within two business days
- Resolution within five business days where possible
- Maximum delay of two weeks, with a possible extension of two additional weeks if delay is caused by the player's lack of response

4.2 All Other Complaint Types

- Acknowledgment within one week
- Resolution within four weeks
- One possible extension of four additional weeks with prior written notice

4.3 Final Response

Betrust Entertainment will issue a written final decision containing either:

1. A reasoned explanation including supporting evidence, or
2. A justified refusal if the complaint cannot be handled, or
3. Instructions to escalate the case to ADR if the player remains dissatisfied

4.4 Use of Artificial Intelligence

- AI will not be used for Responsible Gaming related complaints.
- AI will not be used for complex complaint cases.
- Any AI generated responses must be monitored for consistency and fairness.

5. Alternative Dispute Resolution (ADR)

Betrust Entertainment provides free access to ADR services certified by the CGA.

Requirements:

1. ADR procedures and provider details will be included in the Terms and Conditions.
2. Betrust Entertainment will maintain and upload an active agreement with a certified ADR provider to the CGA Portal.
3. ADR services are free for players. The operator pays all associated costs.

4. Once ADR is completed, the dispute cannot be reopened with another ADR provider.
 5. If a player abandons an ADR process, the dispute cannot be resurfaced later.
 6. Betrusted Entertainment may set reasonable ADR parameters to prevent abuse, in line with civil law requirements.
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6. Record Keeping and Reporting

Betrusted Entertainment will submit biannual reports to the CGA on January 15 and June 15, starting January 2026.

Reports will include:

- Total complaints received
- Number of resolved complaints (upheld or rejected)
- Pending complaints
- Complaints by category
- Complaints escalated to ADR
- Complaints resulting in legal action

Records of unresolved complaints and disputes will be kept for up to five years or as required by applicable law. The CGA may request access to complaint records at any time.

7. Terms and Conditions Requirements

The Complaints Procedure must be clearly visible on the Betrusted Entertainment website and included in the Terms and Conditions.

Required information includes:

- Support contact details
- Instructions for submitting a complaint
- Links to the Complaint Submission Form
- Resolution timelines
- Player rights including ADR rights
- Consequences of ADR decisions and implications for further legal recourse

- ADR provider contact information
 - Clear statement that the CGA does not mediate individual disputes
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8. Valid Reasons for Complaint

Players may submit a complaint to Betrusted Entertainment for issues including but not limited to:

- Deposit or withdrawal problems
- Bonus conditions
- Account suspension or restrictions
- Game outcome errors or fairness concerns
- Responsible gaming issues
- Player balance concerns
- KYC or verification
- Data protection
- Technical or software failures
- AML related concerns
- Issues involving minors
- Fraudulent games or practices
- Licensing or regulatory issues
- Unfair terms and conditions