

Player Complaints Policy

Overview

123GlobalMedia is committed to providing a fair, transparent, and efficient complaints process in compliance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority (CGA) Complaints Guidelines, Version 1.1.

This policy ensures that all players have access to a clear and effective complaints procedure, including access to an independent and free-of-charge Alternative Dispute Resolution (ADR) mechanism.

This Complaints Policy is publicly available on our website and clearly referenced in our Terms and Conditions.

Definitions

Complaint: A written expression of dissatisfaction regarding our services, terms, or actions.

Dispute: A complaint that has not been resolved to the player's satisfaction and is escalated.

Player Interaction: Any written communication initiated by a player toward our support team.

Submitting a Complaint

Players may submit a complaint within six months of the settlement of the relevant bet or incident.

Complaints must be submitted by the registered player only.

A Complaint Submission Form is available through CS and in English and in the language of the platform used by the player.

The form includes:

- Full name and address
- Player account number
- Date of complaint and incident
- Description and category of the issue
- Supporting documentation may be requested if relevant.

Complaint Handling Process

Initial Acknowledgment

Within 2 business days (for responsible gaming complaints) or 1 week (for other types), the player will receive:

- A written confirmation of receipt
- Information on how the complaint will be handled
- Estimated resolution timelines

Resolution Timelines

Responsible Gaming complaints: Resolved within 5 business days (extendable to 2 weeks if justified)

Other complaints: Resolved within 4 weeks, extendable once by another 4 weeks with written notice

Final Response

A written, reasoned final decision will be provided, including any supporting evidence or reasons for rejection.

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

Use of AI

Human handling is required for responsible gaming and complex complaints.

AI, if used, will be supervised to ensure consistency and fairness.

Alternative Dispute Resolution (ADR)

- If the complaint is not resolved, players have the right to escalate to a CGA-certified ADR provider at no cost.
- The ADR provider's decision is final for the process and cannot be re-initiated elsewhere.
- Contact information and access to ADR will be made available in our Terms and Conditions and via direct communication.

Record-Keeping & Reporting

123GlobalMedia maintains complete records of complaints and outcomes.

Reports will be submitted to the CGA on January 15th and June 15th each year, starting in January 2026, including:

Total complaints, outcomes, ADR referrals, and legal escalations

Access and Transparency

This Complaints Policy is accessible via [homepage/registration page] and within our Terms and Conditions.

We provide:

- Clear complaint submission instructions
- Response timelines
- ADR contact information
- Notice that CGA does not mediate individual disputes but accepts regulatory breach reports

Grounds for Complaint

Complaints may include but are not limited to:

- Deposit/withdrawal delays
- Bonus terms
- Account restrictions
- Game fairness
- Responsible gambling
- Verification or KYC
- Data protection
- Technical issues
- AML and fraud concerns
- Unfair terms
- Minor involvement
- Breach of license terms

Transition Clause

As per the CGA's requirements, this policy has been uploaded to the CGA Portal before the July 31, 2025 deadline.

Communication

This policy will be placed on Confluence and communicated to Staff.

Review

The Company will review this policy at least every year since publication of the last revision.

Non-Compliance

All company employees are required to read and comply with this policy. Failure to comply with this policy shall be considered gross misconduct and could result in termination of employment.

Document Quality

Version	Changes	Updated by	Approved by	Date
v1.0	Initial Version	CCO	CCO	15/7/2025