

3. PLAYER COMPLAINTS AND ADR POLICY — VERSION 1.1

3.1 Policy Statement

Bet N Play Solution B.V. is committed to providing players with a fair, transparent, accessible and free complaints process.

This Policy applies to all player-facing domains, brands, platforms and services operated by or under the control of Bet N Play Solution B.V.

3.2 Definition of Complaint

A complaint is a written expression of dissatisfaction by a player regarding the Company's services, products, decisions, Terms and Conditions, payment handling, game outcome, account status, responsible gaming measures, AML/KYC process, conduct or any other matter where the player reasonably expects a response or resolution.

A dispute is a complaint that has not been resolved to the player's satisfaction through the internal complaints process and is escalated to an ADR provider or court.

3.3 Time Limit

Players may submit complaints free of charge within six months of the relevant incident or the settlement of the disputed bet.

For peer-to-peer games, poker or ante-post betting, the period begins when the event concludes or the bet is settled.

Complaints submitted after the six-month period may be rejected unless required by law or exceptional circumstances justify review.

3.4 Who May Submit a Complaint

Only the registered account holder may submit a complaint regarding their account or gambling activity.

The Company may request identity verification before processing the complaint.

Player claims against the licensed operator may not be sold, assigned, transferred, rented, pledged or otherwise disposed of where prohibited by law.

3.5 Complaint Channels

Players may submit complaints through:

1. customer support email;
2. live chat;
3. official complaint form;
4. any other approved customer support channel.

A complaint should include:

1. full name;
2. account username or number;
3. email address;
4. country of residence;
5. date of disputed event;
6. description of the issue;
7. supporting evidence.

3.6 Complaint Categories

Complaints may relate to:

1. deposits;
2. withdrawals;
3. payment processing;
4. bonuses;
5. promotions;
6. account restriction or closure;
7. game malfunction;
8. unfair outcome;
9. responsible gaming;
10. self-exclusion;
11. AML/KYC verification;
12. data privacy;
13. customer support;
14. technical access;
15. fraud prevention;
16. underage access concerns;
17. regulatory or licensing matters;
18. unclear or unfair Terms and Conditions.

3.7 Complaint Resolution Process

The Company shall acknowledge receipt of responsible gaming complaints within two business days and aim to provide a final response within five business days.

Other complaints shall be acknowledged within one week and answered within four weeks.

Where necessary, the Company may extend the response period once for up to four additional weeks, provided the player is informed of the reason and expected response date.

3.8 Final Response

The final response shall include:

1. the outcome;
2. reasons for the decision;
3. evidence reviewed, where appropriate;
4. any corrective action;
5. information about escalation to ADR if the player remains dissatisfied.

The Company shall not rely solely on automated decision-making or artificial intelligence to determine player complaints.

3.9 Alternative Dispute Resolution

If a complaint is not resolved internally, the player may refer it to an independent ADR provider free of charge.

The Company shall:

1. identify the ADR provider on the website and in the Terms and Conditions;
2. cooperate in good faith;
3. provide requested records;
4. bear the costs of ADR unless otherwise required by law;
5. comply with ADR decisions where binding on the Company under applicable rules.

Nothing in this Policy restricts the player's right to seek remedies before a competent court.

ADR Provider: [to be completed]

ADR Website: [to be completed]

ADR Email: [to be completed]

3.10 Role of CGA

The Curaçao Gaming Authority supervises compliance with gaming laws and licence conditions.

The CGA does not act as the internal complaint handler and does not normally adjudicate individual player disputes. However, players may contact the CGA regarding alleged regulatory breaches, player protection failures, misconduct or non-compliance.

3.11 Record Keeping and Reporting

The Company shall maintain a central complaints register including:

1. date received;
2. player identification;
3. category;
4. evidence;
5. actions taken;
6. outcome;
7. escalation to ADR or court;
8. resolution time.

Complaint and ADR reports shall be submitted to the CGA when required and in accordance with applicable reporting deadlines.

Complaint records shall be retained for at least five years or longer where required by law.

3.12 Accessibility

This Policy shall be:

1. published as a standalone website page;
2. linked in the footer;
3. linked from Terms and Conditions;
4. available in English and, where relevant, in the language of the target market;
5. kept accurate and up to date.

Nothing in this Policy limits rights available to players under applicable law.



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