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GLOBONET B.V.

PLAYER COMPLAINTS POLICY

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1. Overview

- 1.1. GLOBONET B.V. (hereinafter “we”, “casino”, “operator”) is committed to providing a transparent, fair, and efficient process for addressing player concerns and complaints. For this purpose and in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the regulations of the Curacao Gaming Authority (CGA) the Player Complaints Policy (hereinafter the “Policy”) is established.
- 1.2. The 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.
- 1.3. This Policy is an integral part of our General Terms and Conditions and sets out the complaints submission and resolution process for the registered players of the casino.

2. Definitions

- 2.1. **Player Interaction** means any written communication initiated by a player and directed to the operator’s customer service team via LiveChat or registered email. This includes general enquiries, feedback, or requests for information, assistance, or clarification.
- 2.2. **Complaint** means 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. The Player’s Interaction is considered to be the Complaint when it is expressed via Complaint Submission Form and has been submitted by the player to the operator and/or a complaint has been escalated to ADR.
- 2.3. **Dispute** means 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).
- 2.4. **ADR** means an independent Alternative Dispute Resolution process.
- 2.5. **ADR Provider** means a CGA Certified ADR entity that has agreed with the operator.

3. Stages of complaint resolution

- 3.1. The registered player may express their dissatisfaction related to our services, and we provide a set of tools to let them escalate the issue up to the final resolution.
- 3.2. There are three stages of complaint resolution process:

- i. **Interaction with customer support team via registered email or LiveChat.** At this stage, the player's dissatisfaction is not recognized as a complaint. Nevertheless, the casino provides all reasonable endeavours to resolve the player's issue at this stage.
- ii. **Submission of the complaint.** The player may skip the first stage and lodge the complaint via the Complaint Submission Form given in the footer of the website. Once the operator receives the fully completed complaint, it becomes subject to the National Ordinance on Games of Chance regulation and will be processed as described below.
- iii. **Alternative dispute resolution (ADR).** If the player's complaint has not been resolved internally on any of the previous stages, the player may apply to the independent ADR Provider free of charge. Once ADR process is completed, it cannot be recommenced by either the player or the operator with another ADR entity. In the event that the player drops out of the ADR process (but it has already begun), it should be noted that the player should not have the right to resurface the dispute in the future. The complaints addressed to ADR Provider have a minimum claim value threshold, except complaints related to responsible gaming issues. The detailed process of applying to ADR Provider is stated in our ADR Policy.

4. Complaint submission process

- 4.1. Who can submit the complaint: only registered players. The player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the operator.
- 4.2. Deadline for submission of the complaint is at any time up to six months after the settlement of the bet or the incident about which they are making a complaint.
- 4.3. How to submit the complaint: the player submits completed Complaint Submission Form. The Complaint Submission Form is always available in the footer of the casino website. Only fully completed Form is recognized as a complaint and will be processed. The operator may request supporting documentation the player requires to include as part of the complaint.

5. Reasons for complaint

- 5.1. The player has the right to make a complaint regarding any part of their relationship with the operator, or any incident related to their participation in a game of chance. This includes (but is not limited to):
 - i. Deposit issues
 - ii. Withdrawal issues
 - iii. Bonus terms and conditions

- iv. Account closures or restrictions
- v. Alleged errors or unfairness in game outcomes
- vi. Responsible gaming issues
- vii. Treatment of player balances
- viii. KYC and Verification
- ix. Data Protection
- x. Technical or Software issues
- xi. AML concerns
- xii. Issues with minors
- xiii. Fraudulent games
- xiv. Fraudulent practices
- xv. License or regulation
- xvi. Unfair terms and conditions.

6. Complaint resolution process

6.1. Complaints related to responsible gaming and other matters have different timelines. All responsible gaming issues are prioritized.

6.2. **Timeline for Responsible Gaming Complaint.** The general term to resolve these cases is supposed to be **five business days**. Within the first two days of receiving the complaint the operator:

- i. confirms receipt of the complaint in writing;
- ii. provides an explanation of how the complaint will be processed;
- iii. provides notice of the average timeline for resolution of such complaints.

However, the time limit may be extended up to the next two weeks if the operator needs more time to make a reasonable and informed decision. 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.

6.3. **Timeline for all Other Complaint Types.** The general term to assess and respond to these cases is supposed to be four weeks. Within one week of receiving the complaint the operator:

- i. confirms receipt of the complaint in writing;
- ii. provides an explanation of how the complaint will be processed;
- iii. provides notice of the average timeline for resolution of such complaints.

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. During the initial four-week term, the

operator may request additional information. If the player fails to provide the necessary information within this time period, the operator may reject the complaint.

- 6.4. Response and Resolution. We provide the player with a final determination of their complaint in writing. If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player may escalate the matter to an independent ADR entity.

7. Player rights & regulatory contact

- 7.1. The player may also contact the Curacao Gaming Authority for regulatory concerns (e.g. license breaches, malpractice, or whistleblowing).
- 7.2. The CGA does not intervene in individual disputes.

8. Record-keeping & reporting

- 8.1. We maintain complaint records in compliance with legal requirements and report regularly to the CGA. Records of unresolved or escalated complaints are stored for up to five years.

9. Versions and Amendments

- 9.1. We acknowledge that internal and website versions of the Policy may have minor differences in wording, but not in meaning, to make it more readable for players. For this purpose, the drafts of website versions are attached.
- 9.2. The Policy and its website versions may be subject to amendment due to the regulation requirements, alterations in the complaint submission flow, etc. The updated Policy takes effect in two weeks after it has been announced on the website, and for the player - from the moment they confirm their acceptance of the amended Policy. The date and time of the announcement is indicated in the Policy.

10. Acceptance of this Policy

- 10.1. By accepting our General Terms and Conditions, the player acknowledges and accepts this Complaints Policy.

11. ANNEXES

ANNEX 1 "PlayFortuna Player Complaints Policy";
ANNEX 2 "Booi Player Complaints Policy";
ANNEX 3 "JOZZ Player Complaints Policy".

Player Complaints Policy

1. Introduction

- 1.1. GLOBONET B.V. (referred to as “we” or “the operator”), as the licensed operator of the online casino at <https://playfortuna.com/> (the “casino”), ensures a clear, equitable, and effective approach for handling player issues and concerns. In line with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority (CGA) guidelines, this Player Complaints Policy (the “Policy”) has been created.
- 1.2. The Policy outlines our commitment to providing users with easy access to a structured complaint and dispute resolution mechanism, including no-cost access to independent alternative dispute resolution (ADR) services of a high standard.
- 1.3. This Policy forms part of our General Terms and Conditions and outlines the procedures for submitting and resolving complaints made by registered users of the casino.
- 1.4. By agreeing to the General Terms and Conditions, the player also agrees to follow the terms of this Complaints Policy.

2. Key Definitions

- 2.1. **Player Interaction** means any written communication initiated by a player and directed to the operator’s support team, either through LiveChat or a registered email address. This may include general inquiries, feedback, or requests for support or clarification.
- 2.2. **Complaint** means a formal written dissatisfaction regarding the operator’s services, actions, or terms, where the player seeks a response or resolution. A Complaint is considered valid once submitted through the Complaint Submission Form [URL] or escalated to ADR.
- 2.3. **Dispute** means a Complaint that has not been successfully resolved through the operator’s internal process and is subsequently referred to an external party (such as an ADR body or a court).
- 2.4. **ADR** stands for Alternative Dispute Resolution, which refers to an independent method of resolving disputes outside of court.
- 2.5. **ADR Provider** means an ADR entity certified by the CGA and engaged by the operator.

3. Stages of complaint resolution

- 3.1. Registered players may raise any dissatisfaction regarding the services we provide, with a structured escalation path leading up to final resolution.
- 3.2. There are three stages of complaint resolution process:
 - i. **Initial Interaction**. The player may contact the customer support team via LiveChat or a registered email. This stage is not yet considered a formal complaint, though the operator will make reasonable efforts to address the issue.
 - ii. **Submission of the complaint**. Players may bypass the initial stage and submit a formal complaint directly through the Complaint Submission Form [\[URL\]](#). Upon full completion and receipt of the form, the complaint becomes subject to regulation under the National Ordinance on Games of Chance and will be reviewed accordingly.
 - iii. **Alternative dispute resolution (ADR)**. If the issue remains unresolved internally, the player may approach an independent ADR provider, free of charge. Once the ADR process is concluded, it cannot be restarted with another ADR body. If the player withdraws mid-process, the dispute cannot be reopened in the future. Note: the operator may set out a minimum claim value requirement, excluding responsible gaming concerns. See our ADR Policy [\[URL\]](#) for further details.

4. Complaint submission process

- 4.1. Eligibility: Only individuals who are registered players may submit complaints. These claims cannot be transferred, sold, donated, leased, or pledged in any way.
- 4.2. Deadline: Complaints must be filed within six months from the date the bet was settled or the relevant incident occurred.
- 4.3. Procedure: Complaints must be submitted via the Complaint Submission Form [\[URL\]](#), located in the footer of the casino website. Only fully completed forms will be recognized and processed. The operator may request relevant documentation to support the complaint.

5. Reasons for complaint

- 5.1. Players are entitled to submit a complaint about any aspect of their interaction with the operator, including but not limited to:
 - i. Deposit issues
 - ii. Withdrawal issues
 - iii. Bonus terms and conditions

- iv. Account closures or restrictions
- v. Alleged errors or unfairness in game outcomes
- vi. Responsible gaming issues
- vii. Treatment of player balances
- viii. KYC and Verification
- ix. Data Protection
- x. Technical or Software issues
- xi. AML concerns
- xii. Issues with minors
- xiii. Fraudulent games
- xiv. Fraudulent practices
- xv. License or regulation
- xvi. Unfair terms and conditions.

6. Complaint resolution process

6.1. Different complaint categories follow specific timelines, with responsible gaming matters receiving priority.

6.2. **Timeline for Responsible Gaming Complaint.** These are addressed within **five** business days. Within the **first two** days, the operator will:

- i. confirms receipt of the complaint in writing;
- ii. provides an explanation of how the complaint will be processed;
- iii. provides notice of the average timeline for resolution of such complaints.

The resolution period may extend up to an additional two weeks if more time is needed. If delays are due to lack of response from the player, a further extension of up to two weeks may apply.

6.3. **Timeline for all Other Complaint Types.** Typically resolved within **four weeks**. Within the **first week**, the operator will:

- i. confirms receipt of the complaint in writing;
- ii. provides an explanation of how the complaint will be processed;
- iii. provides notice of the average timeline for resolution of such complaints.

If necessary, and with written notification, this period may be extended once by up to four weeks due to complexity or insufficient information. The operator may request further documentation. Failure to provide it in time may result in the complaint being rejected.

6.4. **Response and Resolution.** A written resolution will be provided. If unsatisfied, the player may escalate the matter to an independent ADR Provider.

7. Player rights & regulatory contact

- 7.1. Players may also contact the Curacao Gaming Authority (CGA) regarding regulatory violations, misconduct, or whistleblower concerns. The CGA does not handle individual dispute cases.

8. Record-keeping & reporting

- 8.1. The operator keeps complaint records as legally required and submits reports to the CGA. Unresolved or escalated complaints are retained for up to five years.

9. Versions and Amendments

- 9.1. This Policy may be updated in response to regulatory changes or internal process updates. Revised versions take effect two weeks after publication on the website and are binding for players upon their acknowledgment. The date and time of publication will be stated in the document.

Version 1.0

dd/mm/yyyy

Player Complaints Policy

1. Introduction

- 1.1. GLOBONET B.V. (“we” or “the operator”), as the licensed entity responsible for operating the online casino at <https://booi.com/> (the “casino”), is dedicated to managing player complaints in a transparent, fair, and timely manner. In accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority (CGA) standards, we have established this Player Complaints Policy (the “Policy”).
- 1.2. The aim of this Policy is to ensure that all players have access to an uncomplicated and effective mechanism for raising concerns and resolving disputes. This includes free access to an independent Alternative Dispute Resolution (ADR) service that upholds impartiality and quality standards.
- 1.3. This Policy forms part of the General Terms and Conditions of the casino, and by agreeing to those terms, players confirm their acceptance of and compliance with this Policy.

2. Key Definitions

- 2.1. **Player Interaction** means any message or inquiry submitted by a player via registered email or LiveChat to the customer service team. This may include general questions, feedback, or requests for support.
- 2.2. **Complaint** means a written statement of dissatisfaction related to services, decisions, or terms provided by the operator. A submission is considered a complaint when it is completed through the official Complaint Submission Form [URL] or has been referred to ADR.
- 2.3. **Dispute** means any complaint that remains unresolved through internal procedures and is taken to an external authority, such as an ADR entity or legal institution.
- 2.4. **ADR** means an independent Alternative Dispute Resolution process.
- 2.5. **ADR Provider** means an ADR entity that is certified by the CGA and engaged by the operator for handling escalated complaints.

3. Stages of complaint resolution

3.1. Players who are registered with the casino can raise concerns regarding any aspect of the service. The complaint resolution process follows three defined stages:

- i. **Initial Interaction**. Players may initially reach out to support through LiveChat or email. While concerns raised here are not officially complaints, our team will make every effort to resolve them promptly.
- ii. **Submission of the complaint**. Players can choose to bypass the first step and submit a complaint directly using the Complaint Submission Form [\[URL\]](#). Once fully completed and received, the issue will be processed in accordance with the Policy and laws of Curacao.
- iii. **Alternative dispute resolution (ADR)**. If the issue is unresolved after internal review, players may submit it to an ADR Provider at no cost. Note that once an ADR process is concluded, it cannot be reopened with a different ADR service. If a player exits the ADR process midway, the case cannot be resubmitted later. The operator may set out a minimum claim value, except in cases related to responsible gambling. See our ADR Policy [\[URL\]](#) for full guidance.

4. Submitting a Complaint

- 4.1. **Who may submit:** Only individuals with registered casino accounts may file complaints. These claims cannot be transferred or assigned in any form.
- 4.2. **Submission deadline:** Players must lodge complaints within six months from the date of the incident or bet settlement.
- 4.3. **Submission process:** Complaints must be sent via the official Complaint Submission Form [\[URL\]](#), available at the bottom of the website. Only properly completed forms will be processed. Supporting documents may be requested by the operator.

5. Reasons for complaint

- 5.1. Players may raise complaints regarding any element of their relationship with the operator or any game-related issue, including but not limited to:
 - i. Deposit issues
 - ii. Withdrawal issues
 - iii. Bonus terms and conditions
 - iv. Account closures or restrictions
 - v. Alleged errors or unfairness in game outcomes
 - vi. Responsible gaming issues

- vii. Treatment of player balances
- viii. KYC and Verification
- ix. Data Protection
- x. Technical or Software issues
- xi. AML concerns
- xii. Issues with minors
- xiii. Fraudulent games
- xiv. Fraudulent practices
- xv. License or regulation
- xvi. Unfair terms and conditions.

6. Complaint resolution timelines

6.1. Complaints are prioritized based on type, with responsible gambling concerns receiving urgent attention.

6.2. **Timeline for Responsible Gaming Complaint.** These are typically resolved within **five business days**. Within **two business days** of receiving the complaint, the operator will:

- i. confirm receipt of the complaint in writing;
- ii. provide an explanation of how the complaint will be processed;
- iii. provide notice of the average timeline for resolution of such complaints.

The resolution window may be extended by up to two additional weeks for complex cases. If a delay is caused by the player's unresponsiveness, the process may be prolonged for another two weeks.

6.3. **Timeline for all Other Complaint Types.** These are reviewed within a four-week period. Within one week of receipt, the operator will:

- iv. confirm receipt of the complaint in writing;
- v. provide an explanation of how the complaint will be processed;
- vi. provide notice of the average timeline for resolution of such complaints.

In complex situations or when documentation is lacking, the operator may extend the period once for an additional four weeks, notifying the player in advance. If the player does not provide the required information, the complaint may be dismissed.

6.4. **Response and Resolution.** The operator will send a final decision in writing. If the player remains dissatisfied, they may escalate the matter to a certified ADR Provider.

7. Regulatory contact

- 7.1. If a player believes there is a breach of license conditions or other regulatory issue, they may contact the Curacao Gaming Authority. However, the CGA does not intervene in individual complaints.

8. Record-keeping & reporting

- 8.1. The operator stores complaint data in line with legal obligations and provides periodic reports to the CGA. Documentation for unresolved or escalated complaints is retained for a period of five years.

9. Versions and Amendments

- 9.1. This Policy may be updated in response to regulatory developments or changes in our complaint procedure. Revised versions become effective two weeks after being posted on our website, and immediately upon player acknowledgment. The date and time of any update will be stated within the Policy.

Version 1.0

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Player Complaints Policy

1. Introduction

- 1.1. GLOBONET B.V. (referred to as “we” or “the operator”) operates the licensed online casino platform at <https://jozz.com/> (“the casino”) and upholds a fair, transparent, and effective system for handling player grievances. In accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority (CGA) requirements, this Player Complaints Policy (“the Policy”) outlines our procedures.
- 1.2. This Policy ensures that players have straightforward access to an efficient complaint resolution process, including free and independent Alternative Dispute Resolution (ADR) services that meet regulatory quality standards.
- 1.3. This document is a formal extension of our General Terms and Conditions. By accepting these terms, the player also agrees to comply with the processes defined in this Policy.

2. Glossary

- 2.1. **Player Interaction:** Any message, question, or feedback initiated by a player through LiveChat or via an email sent from a registered address to the operator’s support service.
- 2.2. **Complaint:** A player’s written expression of dissatisfaction concerning the services, conduct, or decisions of the operator, submitted through the Complaint Submission Form [URL] or referred to an ADR provider.
- 2.3. **Dispute:** A complaint that remains unresolved after internal procedures and is forwarded to an external party, such as an ADR body or judicial authority.
- 2.4. **ADR:** an independent Alternative Dispute Resolution process.
- 2.5. **ADR Provider:** An independent resolution body certified by the CGA and designated by the operator for handling escalated cases.

3. Complaint Resolution Stages

3.1. Registered players can raise issues regarding our services through the following three-tiered procedure:

- i. **Initial Interaction**. Players may initially reach out through LiveChat or email. At this point, the matter is treated as a query, not a formal complaint, although efforts will be made to resolve the issue promptly.
- ii. **Submission of the complaint**. Players may proceed directly to formal submission by completing the Complaint Submission Form [\[URL\]](#). Upon submission of a complete form, the complaint enters formal review in accordance with relevant regulations.
- iii. **Alternative dispute resolution (ADR)**. If no resolution is achieved through internal channels, the complaint can be escalated to a certified ADR Provider at no charge. Once an ADR procedure is completed, reopening the case through another ADR is not permitted. If the player withdraws during the ADR process, the dispute cannot be reopened. Minimum claim values may apply, excluding responsible gambling issues. Full details are available in our ADR Policy [\[URL\]](#).

4. How to File a Complaint

- 4.1. **Eligibility**: Only registered players can file complaints. Such rights cannot be sold, transferred, leased, or otherwise reassigned.
- 4.2. **Filing Deadline**: Players have up to six months from the date the event or bet was settled to submit their complaint.
- 4.3. **Submission Procedure**: The complaint must be sent using the official Complaint Submission Form [\[URL\]](#), accessible in the website footer. Incomplete submissions will not be processed. Additional supporting materials may be required by the operator.

5. Acceptable Complaint Topics

- 5.1. Players are allowed to submit complaints related to any issue in their interaction with the casino, such as (the list is not exhaustive):
 - i. Deposit issues
 - ii. Withdrawal issues
 - iii. Bonus terms and conditions
 - iv. Account closures or restrictions
 - v. Alleged errors or unfairness in game outcomes

- vi. Responsible gaming issues
- vii. Treatment of player balances
- viii. KYC and Verification
- ix. Data Protection
- x. Technical or Software issues
- xi. AML concerns
- xii. Issues with minors
- xiii. Fraudulent games
- xiv. Fraudulent practices
- xv. License or regulation
- xvi. Unfair terms and conditions.

6. Timelines for Resolution

6.1. Timeframes differ depending on the nature of the complaint. Responsible gambling matters are handled with urgency.

6.2. **Responsible Gambling Cases:** These are generally resolved within five working days. Within two business days of receiving the complaint, the operator will:

- i. confirm receipt of the complaint in writing;
- ii. provide an explanation of how the complaint will be processed;
- iii. provide notice of the average timeline for resolution of such complaints.

In complex cases, this period may be extended by an additional two weeks. If the delay is due to the player's lack of response, an extra two weeks may be added.

6.3. **Other Complaint Types.** A resolution is typically provided within four weeks. Within the first week, the operator will:

- i. confirm receipt of the complaint in writing;
- ii. provide an explanation of how the complaint will be processed;
- iii. provide notice of the average timeline for resolution of such complaints.

If more time is needed due to complexity or missing information, the operator may extend this period once by up to four additional weeks, provided written notice is given. During the initial four-week term, the operator may request additional information. If the player does not respond in time, the complaint may be declined.

6.4. **Response and Resolution.** The outcome will be communicated in writing. If the player is not satisfied, they can refer the matter to a certified ADR Provider.

7. Regulatory contact

- 7.1. For regulatory violations, misconduct, or whistleblower issues, players may contact the Curacao Gaming Authority. Note that the CGA does not intervene in private complaint matters.

8. Record-keeping & reporting

- 8.1. The operator retains complaint records in line with regulatory requirements and reports on them to the CGA. Files for unresolved or escalated complaints are preserved for up to five years.

9. Policy Revisions

- 9.1. This Policy may be revised due to changes in legislation or internal procedures. Updates become effective two weeks after they are posted on the casino's website and are binding once players acknowledge them. The date and time of publication will be stated.

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dd/mm/yyyy