



Susan Ndinga &lt;susan\_ndinga@shshumanfirst.com&gt;

## Formal Complaint – Misconduct by EU Lotto Ltd (Lottoland) & Regulatory Negligence in Gibraltar

1 message

Susan Ndinga &lt;susan\_ndinga@shshumanfirst.com&gt;

Thu, Sep 4, 2025 at 12:42 PM

To: privacy@gra.gi, gccomplaints@gibraltar.gov.gi

Cc: Lottoland Customer Support &lt;support@lottoland.co.uk&gt;, dsar &lt;dsar@lottoland.com&gt;

Good afternoon Louise or whoever this may reach,

Hope you're having a divine start to your week.

### Introduction

I am submitting this complaint to highlight not only the unlawful practices of **EU Lotto Ltd (trading as Lottoland)** but also the **systemic negligence of Gibraltar's oversight framework** which has enabled these breaches to continue.

This is no longer an isolated customer dispute. It is evidence of a **pattern of misconduct** by a Gibraltar-licensed operator, coupled with **regulatory complacency**, which undermines both consumer rights and the integrity of Gibraltar's gambling industry.

## 1. Against Lottoland (EU Lotto Ltd)

### a. Failure of Data Protection Obligations

- **Right of Access (Art. 15 GDPR)** ignored: my Subject Access Request was acknowledged on **3 August 2025**, but the response was incomplete, misleading, and unlawful.
- **Doctored or incomplete records provided:** Their "final report" ends at **01:07am**, while I have receipts of bets placed at **02:25am**. This is prima facie evidence of **data manipulation** and concealment of potential winnings.
- **Data breach:** I was shown another customer's account information ("Nick"), exposing the company to potential investigations of personal data breaches, as I could've been sent my own "dashboard", which wasn't the information requested in the first place, yet instead a lawyer could argue if the speed of action at which Alex sent the screenshot of someone else's account, opens up investigations to other data breaches, which if even one found would back up this one specific point.
- **Failure of transparency (Art. 12–13 GDPR):** Account was closed without notice. Only after I contacted them did they claim "duplicate accounts," yet I had explicitly requested that the older account be closed, not the active one, as the old one did not have any ongoing bets, yet the one which we strongly believe had multiple wins, was the one victim of data erasure and closure. How "coincidental".

### b. Gambling Licence Breaches

- **Unfair treatment of customer:** Closing an account without warning or fair process, while withholding data and potential winnings.
- **Lack of transparent complaints procedure:** They stalled for days, ignored deadlines, and sent falsified records instead of lawful responses.
- **Possible misappropriation of winnings:** By denying access to my account at the very moment wins may have occurred, Lottoland retains the ability to **claim those winnings internally**. This is a severe integrity issue. The attention towards the account must have been flagged by multiple wins, as there's no system in place that avoids customers to create new accounts, with their own same details. If Lottoland didn't want customers to use this loophole, Lottoland wouldn't have the loophole of getting wins, with the claimed right of account closure where doubled. And as we are in 2025, there's plenty of IT systems that stop the creation of a new account, with the same address, let alone one's bank card. The negligence is the opportunity for Lottoland.

## 2. Against Gibraltar Regulatory Authorities

This case has exposed not only corporate misconduct but also **regulatory failings**:

- The **30-day allowance** under GDPR has become a loophole for operators to stall, delay, and manipulate records before disclosure. Lottoland has exploited this window to send doctored reports. I am not willing to wait any longer and it is now your responsibility, as their regulatory authority, to put pressure on this process, as I have just received another yet again incomplete email, stating if I'm unsatisfied to reply to them and they'll take up to 8 weeks to find a solution. I am now homeless, thanks to this situation, as if we find out there's even a single win they have not released, no matter how small. This might just be the biggest lawsuit they face. Not to consider they're stalling evolutionary progress, as I've offered a new interpretation and more accurate law to Einstein's. This stalls my scientific work, things you cannot even start to comprehend about the universe we live in and engage with on a daily basis.
- **Lack of proactive oversight**: I should not be the one uncovering tampering, data breaches, and concealment of winnings. Gibraltar's regulators should have enforced higher transparency standards long ago, especially when the email track was read. Instead of addressing the already lawfull tampering, I was told to wait 30 days. So the lawsuit that led me to homelessness, will also incorporate Gibraltar, if Lottoland has even one penny. I'm telling you what I'm going to do, before I do so, to give you a chance to face the reality of things and actually do your job, as I don't even have a high school diploma, I find it quite shameful that I can do your job better than you.
- **Erosion of trust**: Gibraltar markets itself as a premier gambling jurisdiction with strong consumer safeguards. Yet in practice, customers face silence, negligence, and derailment, with no visible enforcement action against operators who break the law.

This undermines Gibraltar's credibility not only for players, but also internationally as a jurisdiction meant to uphold the highest standards of probity and fairness.

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### 3. Evidence Submitted

- Full email trail with Lottoland (Ref: **250731-000556**)
- Receipts showing bets placed beyond the time recorded in Lottoland's "final" transaction file
- Screenshots and correspondence proving disclosure of another customer's account data
- Timeline summary of events and deadlines ignored by Lottoland

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### 4. Remedies Requested

I am requesting:

1. A full investigation into Lottoland's practices, specifically around **tampering with transaction records** and **withholding winnings**.
2. A full release of any wins straight to my bank account from [susan\\_ndinga@shshumanfirst.com](mailto:susan_ndinga@shshumanfirst.com) account, as the situation itself overrides any rights they might have had against withholding even £1, given the nature of their misconduct. They lost every right when they sent the unfinished transaction document, yet are trying to play the part of "You have agreed to our laws on the website..". Yes, that was before I was sent lawful documents. Creating a second account out of ignorance to your own laws, as my internet traffic can prove I had not read your terms and conditions, I am in a more favourable position than you are, as you supposedly know the rules of your industries and are the one in a "professional" role, which is regulated by institutional and constitutional laws.
3. Enforcement of GDPR obligations, including sanctions for failing my SAR.
4. Regulatory action to ensure Lottoland releases my **full, unaltered account history** and confirms whether any winnings were withheld.
5. A review of Gibraltar's regulatory procedures which currently enable operators to exploit loopholes and avoid accountability.
6. An apology letter, with implementations that will be done in order to avoid this mental turmoil to anyone else that follows me. People don't deserve this and the ways in which my case was handled, tells me I'm not the only one, so this is an easy case to take down, if you were to force my hand. I might be homeless, but I'm resourceful as you can see. I don't think like other people and would love for you not to undermine or underestimate my ingenious cunning.

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### Closing

This matter is no longer just about my personal account. It is a **test case** that highlights systemic flaws in how Gibraltar-licensed operators are regulated. If unaddressed, it risks damaging Gibraltar’s international reputation as a trusted gambling jurisdiction.

I therefore urge the GRA and the Gambling Commissioner to treat this complaint with urgency and transparency, and to provide me with a clear timeline of next steps.

Sincerely,

**Susan Ndinga Wright**

Email: [susan\\_ndinga@shshumanfirst.com](mailto:susan_ndinga@shshumanfirst.com)

Reference: Lottoland Support Ticket #250731-000556

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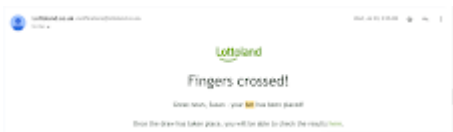
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**4 attachments**



Screenshot 2025-09-03 09.09.48.png  
45K

**Susan Ndinga Mail - Re\_ 250731-000556 - Corruption\_Negligence in the Ombudsmen - GRA.pdf**  
408K

**Gmail - Data Protection Investigation [Our Ref\_ C21\_25].pdf**  
577K

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