

RESPONSIBLE GAMING POLICY

(In accordance with the Curacao Gaming Authority (CGA) Requirements – Updated 2025)

Operator: GB TECH SERVICES N. V

License Holder: OGL/2024/250/0115

Brands/Domains Covered: goplay365.com; ienabet.com; dice365.live; betx360.live; turn.bet

Version: 1.0

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1. Introduction

This Responsible Gaming Policy has been developed in accordance with the requirements of the **Curacao Gaming Authority (CGA)** and the **National Ordinance on Games of Chance (LOK)**.

Our objective is to ensure that gambling remains a form of entertainment and to prevent gambling-related harm by implementing robust tools, procedures, and safeguards.

We are committed to maintaining a **safe, fair, and transparent gaming environment** and to protecting **Vulnerable Persons**, including minors, self-excluded players, and individuals exhibiting problem gambling behavior

2. Definitions

All definitions used in this Policy correspond to those published by the CGA, including:

- **CGA** (Curacao Gaming Authority)
- **Games of Chance**
- **Cooling-Off**
- **Self-Exclusion**
- **Minor**
- **Operator**
- **Vulnerable Person**
- **Mandatory Requirements, Marketing, Responsible Gaming Tools**

3. Responsible Gaming Governance

3.1 Policy Ownership

The Operator appoints a **Responsible Gaming Officer (RGO)** or, until appointed, the **Compliance Officer** assumes this responsibility.

The RGO is responsible for:

- Implementation of this policy
- Monitoring adherence across all departments
- Preparing an **annual RG effectiveness report** for senior management

- Recommending improvements and ensuring CGA reporting

3.2 Annual Review

The policy is reviewed annually or upon material regulatory changes and any changes are reported to the CGA as required.

4. Responsible Gaming Principles

The Operator integrates Responsible Gaming throughout its business model with the following core principles:

- Gambling must be an enjoyable entertainment activity.
- Vulnerable Persons must be protected at all times.
- Gambling should never be positioned as a solution to financial or emotional difficulties.
- Clear information and RG tools must be always accessible.
- No credit may be offered for wagering.

5. Prevention of Under-Age Gambling

5.1 Age Verification

In compliance with Article 1.4(d) of the LOK:

- Minors (**under 18 years old**) are strictly prohibited.
- Players must self-attest their age and provide date of birth at registration.
- Additional verification checks must be used to obtain reasonable certainty that the individual is not a minor.
- Government-issued ID verification is mandatory prior to first withdrawal or upon reaching CGA risk thresholds.
- If a minor is identified, the account is closed immediately, deposits must be refunded, winnings are forfeited, and the player is informed.

5.2 Records

All age verification results must be logged and available for CGA inspection.

6. Player Information & Accessibility

6.1 Responsible Gaming Section (RG Section)

The Operator maintains a clearly visible RG Section available in **English and the target market language**, containing:

- Information on setting limits, cooling-off, and self-exclusion
- Contact information for RG support

- Links to gambling help organizations
- Explanations of risks and RG tools

6.2 Website Requirements

- RG link visible on homepage and footer
- Terms & Conditions accessible within one click
- Display: “Gambling is prohibited for persons under 18”
- Display of License Holder name, address, CGA license number, and digital seal
- Links to local/international addiction support services

7. Player Self-Assessment

Players must be able to view their account history for a minimum of **6 months** and request additional data within 10 working days.

The RG Section shall include:

- Self-assessment questionnaires
- Guidance for players who identify problematic behavior
- Links to support services

8. Behavior Tracking & Intervention

8.1 Behavior Monitoring

The Operator will monitor player behavior through human supervision (customer support/VIP managers) and automated systems (AI/ML tools) using indicators such as:

- Sudden increase in deposits or wagering
- Reversed withdrawals
- Extended gameplay sessions
- Repeated failed deposits
- Frequent interactions with customer support
- Multiple account creation attempts
- Rapid changes to RG tools

8.2 Intervention Procedures

Player Profiling & Risk Assessment

- A risk rating is assigned to at-risk players.
- All RG interactions are recorded in the Player Account Management (PAM).

Intervention Steps

Depending on the severity, the Operator may:

1. Remind players of RG tools and provide support resources
2. Apply mandatory deposit limits
3. Temporarily suspend the account for assessment
4. Permanently exclude the player (operator-initiated exclusion)

Note:

Responsible Gaming procedures **must not be used to delay or prevent legitimate withdrawals.**

9. Player Protection Tools

9.1 Cooling-Off

Overview:

Players can activate temporary restrictions with the following options:

Duration Options (mandatory):

- 24 hours
- 7 days
- 1 month
- 3 months

Vertical Options (if offered):

- All gambling
- Casino only (or Slots only)
- Sportsbook only

Brand Options (if offered):

- Current brand only
- All operator brands

Implementation:

- Must take effect immediately
- No bonuses or promotions may be offered
- Accounts remain open for withdrawals
- Marketing must cease if opted out

Reactivation:

- Automatic after the selected period ends

9.2 Self-Exclusion

Overview:

Self-exclusion blocks the player from **all brands** for a minimum mandatory duration of **1 year**.

Duration Options:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

Implementation:

- Immediate account closure
- No login permitted
- No marketing or communications permitted
- Ante-post bets must be refunded
- Poker tournaments must be completed
- Duplicate account detection required
- Progressive jackpot contributions remain but are forfeited

Reactivation:

- Player must make a **written request** after exclusion ends
- Operator cannot contact player proactively

9.3 Operator-Initiated Exclusion

The Operator may exclude players who:

- Demonstrate high-risk gambling behaviour
- Engage in criminal or fraudulent activity

Exclusions cannot be based on player winnings.
Records are retained for at least **5 years**.

10. Limits

10.1 Deposit Limits

Players may set:

- Daily deposit limits
- Weekly deposit limits
- Monthly deposit limits

Rules:

- Increases take effect immediately
- Decreases take effect after 24 hours
- Limits do not affect transactions already placed
- Active bets/tournaments must finish but player may not place new wager

11. Staff Training

All customer-facing staff must be trained in:

- Recognizing signs of problematic behavior
- Conducting sensitive conversations
- Understanding all RG tools
- Directing players to support resources

Training is refreshed annually or upon policy update.

12. Advertising & Marketing Standards

The Operator adheres strictly to CGA advertising rules:

- No targeting minors or Vulnerable Persons
- No presenting gambling as an income source
- No implying that skill influences games of chance
- No emotional manipulation
- No linking gambling with alcohol, drugs, sex, or smoking
- Clear bonus terms
- Affiliates and influencers must comply
- All advertising must include a Responsible Gaming message

13. Enhanced Responsible Gambling Measures

Depending on risk profile, the Operator may apply additional measures such as:

13.1 Internet Filtering Tools

Links to tools such as:

- BetBlocker
- GamBlock
- Gamban

13.2 Direct Player Interaction

Proactive contact when behavior suggests vulnerability.

13.3 Additional Limits

Including loss limits, wager limits, or time-based limits.

13.4 Reality Checks

- Session timers
- Real-time clocks
- Pop-up reminders
- Player-activated alerts

14. Reporting & Record Keeping

- All RG interactions recorded in PAM
- All exclusions retained for at least 5 years
- Behavior monitoring logs retained per CGA requirements
- Annual RG report submitted to management

15. Contact Information

Players may contact our Responsible Gaming Team at:

 **info@ienabet.com**

 **Live Chat via Website/App**