



Online Gaming License Application Form

This application form is to be completed by an official representative of the applicant for an online gaming license, or by any person who is directed to do so by the Gaming Control Board.

If a question does not apply (those marked as YES), leave it blank in response to that question. If there is nothing to disclose in response to a particular question, write "None" in response to that question. All questions are mandatory. Forms must be filled and submitted in digital format only. Handwritten forms are not accepted.

Application Number: Follow instructions on the portal for your application number	OGL/2024/1209/0631	Date of Application:	30 April 2024
1. Brand Name: The name applied to the products or services under the gaming license.	Apuesta Total		
2. Company Name: Enter company name as registered with the Chamber of Commerce of Curaçao.	Free Games B.V.		
3. Primary URL used for operation: Only one primary domain is allowed. Other domains operated under this application must be supplied in an appended sheet or on the on line portal.	www.apuestatotal.com		
4. Business Model: Select the type of business model to be carried under the license. There can only be one business model under a license:	☒ 4.1. Performs player management and fund management for an operation owned by the applicant (B2C operator) ☐ 4.2. Performs player management and fund management for B2C operators (B2B2C operator). ☐ 4.3. Other forms of B2C Operation: Brief Description of the type of operation carried out ☐		
5. Type of Gaming Activity: Select all that apply:	☒ 5.1. Games of Chance (RNG-based games such as slots and casino table games) ☒ 5.2. Betting (including live betting and virtual-sports betting) ☒ 5.3. Live Dealer Games ☐ 5.4. Pooled-prize games (such as lotteries and parimutuel) ☐ 5.5. Promoting peer-to-peer games (such as sport-exchange, bingo and poker) ☐ 5.6. Other:		



Funds Management

6. Does the operation use an online player account to hold player's data and funds?



Yes

7. Are player funds kept in a segregated bank account?



Yes

8. List all fiat currencies used for financial transactions:

Leave blank if none are used. Enter currencies in a comma separated list using the ISO 4217 standard for each currency (such as USD, EUR, GBP).

PEN

9. List all virtual currencies used for financial transactions:

Leave blank if none are used. Enter currencies in a comma separated list using the three/four letter acronym industry standard for each currency (such as BTC, ETH, USDT).

10. Does the operation use cash transactions for player transactions?



Yes

If yes then answer the section below:

10.1. Are cash transaction carried out:

Select all that apply

10.1.1. Directly with the player:



Yes

10.1.2. Through Intermediaries:



Yes

10.1.3. Does the operator have policies and procedures in place for cash transactions?



Yes

Must be submitted to GCB in accordance with license conditions.

11. Does the operator have player identification and verification policies and procedures in place



Yes

Must be submitted to the GCB in accordance with the license conditions.

12. Does the operator have player account suspension and closure in place?



Yes

Must be submitted to the GCB in accordance with the license conditions.

13. Does the operator have anti money laundering policies and procedures in place?



Yes

Must be submitted to the GCB in accordance with the license conditions.

14. Does the applicant have all games certified by an testing laboratory approved by the GCB, if applicable?



Yes

Gaming operators are allowed only to offer games that are certified by an approved testing laboratory. A letter of conformity from an approved testing lab shall be submitted within six months of granting of the license.



Information Management & Controls

15. How is the Player Account Management platform hosted:

Select all that apply

☐

By the operator in a dedicated premises

☐

In a datacenter, using own hardware

☒

Hosted on a cloud-based platform (using shared or virtual private servers)

16. List all countries where the servers are located:

Use comma separated list

EE.UU. Este (Virginia)

17. Is the platform used for Player Account Management and Funds Management owned by:

Select one

☐

The Applicant

☒

Outsourced from a third party

In this case answer 17.1 below. Agreements shall be submitted to GCB within six months of granting of the license in accordance with further guidelines.

17.1. Is the platform software provider licensed in:

☐

Curaçao

☒

Other Jurisdictions:

Specify:

Peru

18. Is the platform used for Player Account Management and Funds Management Audited?

☒

Yes

If yes then list jurisdiction where it has been audited. Auditors shall be required to review these audits.

18.1. List jurisdictions where the platform has been audited:

Peru

19. Are the Player Account Management and Funds Management functions carried out by:

☒

Applicant

☐

Third party service provider

If this option is selected answer 19.1 below.

19.1. Is third party service provider licensed?

☐

Yes:

Specify jurisdictions:

20. Does the applicant have documented policies and procedure for player account and fund management functions?

☒

Yes

Must be submitted to the GCB in accordance with the license conditions.

21. Does the applicant have documented Information Security Policy and procedures in place?

☒

Yes

Must be submitted to the GCB in accordance with the license conditions.



Games Offered

22. What are the game delivery channels:
Select all that apply

☒ PC/Desktop

☐ Mobile

23. Does the operator implement its own games?

☐ Yes

23.1. Are these games certified? ☐ Yes *If yes, answer 23.1.1 below.*

23.1.1. List jurisdictions where games are certified :
Use comma separated list.

24. Does the applicant implement games from third party game providers:

☒ Yes *If yes then answer 24.1 below:*

24.1. List the top 10 game service providers (by volume of transactions) and the jurisdiction from where these games are supplied and certified:

Game Service Provider	Jurisdiction
Altenar	United Kingdom
Pragmatic Play	Romania
Evolution	Malta
CT Gaming	Bulgaria
Amusnet	Bulgaria
Betconstruct (Aggregation Service)	Armenia
Amigo Gaming	Cyprus
GoldenRace	Malta
RedRake	Spain
Mascot	Romania

List of games must be submitted to the GCB in accordance with the license conditions.



Responsible Gaming

- | | | | |
|---|-------------------------------------|-----|--|
| 25. Does the platform inform players on restrictions regarding underage gambling on its front page? | ☒ | Yes | <i>This shall be verified on the domains list provided.</i> |
| 26. Applicant ensures that players are over the age of 18 years before playing? | ☒ | Yes | <i>This shall be verified on the domains list provided.</i> |
| 27. Does the platform provide a means of self exclusion for players? | ☒ | Yes | <i>This shall be verified on the domains list provided.</i> |
| 28. Does the applicant provide information on getting support for problem gambling? | ☒ | Yes | <i>This shall be verified on the domains list provided.</i> |
| 29. Does the applicant implement limits on gaming that can be set by the players? | ☒ | Yes | <i>This shall be verified on the domains list provided.</i> |
| 30. Does the applicant have a responsible gaming policy in place to cover at least the above? | ☒ | Yes | <i>Must be submitted to the GCB in accordance with the license conditions.</i> |

Player's Terms and Conditions

- | | | | |
|--|-------------------------------------|-----|-----------------------------------|
| 31. Are the terms and conditions of use available to players at all times? | ☒ | Yes | |
| 32. Are players informed when changes in terms and conditions occur? | ☒ | Yes | |
| 33. Does the applicant has a player complaints procedure in place? | ☒ | Yes | <i>If yes answer 33.1 below</i> |
| 33.1. Does the operator use an independent alternative dispute resolution entity | ☐ | Yes | <i>If yes answer 33.1.1 below</i> |
| 33.1.1. Name of independent alternative dispute resolution entity. | <input type="text"/> | | |
| 33.1.2. Jurisdiction of alternative dispute resolution entity | <input type="text"/> | | |



Contact Information

34. Full name of the official representative
of the applicant:

*Unless its an official representative of the company,
a power of attorney must be submitted with the
application.*

Lorenza Godett

35. Relationship with applicant:

Indicate all those that apply

☐

Ultimate beneficiary owner

☐

Director/Managing Director

☐

Key Person

☒

Official Representative

☐

Service Provider

36. Passport Number:

37. Country of Issue:

The Netherlands

38. Contact Address:

Bogotastraat 29
2548 HH, Den Haag
The Netherlands

39. Email address:

lgodett@xcm.cw



Declaration and Data Privacy

I, Lorenza Godett, as the representative for the applicant identified in this application form, declare that the information provided is true and correct. I also understand that any willful dishonesty may render for refusal of this application.

I hereby authorize the Gaming Control Board to conduct a complete investigation using whatever legal means they deem appropriate. I hereby authorize any person or entity contacted by Gaming Control Board to provide any and all such information deemed necessary by the Gaming Control Board. I hereby waive any rights of confidentiality in this regard.

I understand that by signing this authorization on behalf of the applicant, a background record check may be performed. On behalf of the applicant, I authorize any banking, financial institution, judicial, or enforcement agency to surrender to the Gaming Control Board a complete and accurate records, including, but not limited to internal banking memoranda, past and present loan applications, financial statements and any other documents relating to business financial records in whatever form and wherever located.

The Gaming Control Board reserves the right to investigate all relevant data and facts to their satisfaction. I understand that the Gaming Control Board may conduct a complete and comprehensive investigation to determine the accuracy of all information gathered. I, on behalf of the Applicant, hereby release, waive, discharge and agree not to hold liable the Gaming Control Board for the receipt and use of such data, other than for unlawful processing of such information, acquired during investigations and inquiries. I hereby authorize the lawful use, disclosure or publication of this data.

I understand that by signing this authorization, I am giving my explicit consent to the Gaming Control Board to collect and process personal data, including sensitive personal data which relates to the data subject.

I confirm that I have read the privacy statement of the Gaming Control Board with regards to personal data.

Sign here:

DocuSigned by:	DocuSigned by:
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Christopher van Rosberg / Lorenza Godett
Directors of Xecutive Corporate Management B.V.

SAVE FORM

EXPORT FORM