

Games & More B.V. - Know Your Customer (KYC) Policy

Company No. 149948 – Hanchi Snoa 19, Trias Building – Curaçao

CGA Licence No. OGL/2023/121/0086

Effective Date: 1/10/2025

1. Policy Overview

This KYC Policy (the “Policy”) is established pursuant to the National Ordinance on Games of Chance (LOK), the National Ordinance on Identification in Service Provision (NOIS), and the Ordinance on the Notification of Unusual Transactions (NORUT). It outlines Games & More B.V.’s obligations to verify the identity of players, monitor ongoing relationships, and ensure compliance with Curaçao’s AML/CFT requirements.

Games & More B.V. outsources its KYC and AML screening obligations to Sumsb Tech Ltd under a Service Provider Agreement (June 2024). All outsourced services remain under the accountability of Games & More B.V.

2. Definitions

2.1 Customer Due Diligence (CDD): Measures taken to identify and verify the identity of players prior to establishing a business relationship.

2.2 Enhanced Due Diligence (EDD): Additional verification measures applied to high-risk players, transactions, or jurisdictions.

2.3 Politically Exposed Person (PEP): An individual entrusted with prominent public functions, including family members and close associates.

2.4 Unusual Transaction: Any transaction flagged under NORUT reporting standards as atypical, suspicious, or inconsistent with a player’s profile.

3. KYC Framework

3.1 Scope of Application

Applies to all registered players across Games & More B.V.’s domains (Annex A) and corporate entities (KYB checks where applicable).

3.2 Outsourced Services (Sumsb Tech Ltd)

Sumsb provides:

- Identity Document Verification
- Liveness and Facial Recognition
- Proof of Address Verification
- Geolocation Verification

- Sanctions, PEP, Watchlist & Adverse Media Screening
- Ongoing AML Monitoring
- Email & Phone Verification
- IP Address Analysis
- Payment Method Verification
- Crypto Transaction Monitoring
- Fraud Detection and Behavioural Risk Scoring

3.3 KYC Information Required

- Full legal name
- Date of birth
- Residential address
- Government-issued ID
- Proof of Address
- Email address and phone number
- Payment method verification

4. Risk-Based Approach

4.1 Standard Risk (CDD)

- Verification via automated ID, liveness, and address checks.
- Sanctions and PEP screening before first withdrawal.

4.2 Enhanced Risk (EDD)

Applied if:

- Player is a PEP or linked to adverse media.
- Player uses high-risk payment methods (crypto wallets, cross-border transfers).
- Large/unusual transactions exceed NORUT thresholds.

Measures:

- Source of wealth/funds documentation
- Senior management approval
- Heightened monitoring

5. Ongoing Monitoring

5.1 Continuous screening against sanctions, PEP lists, and adverse media.

5.2 Sumsb provides automated alerts for changes in player risk status.

5.3 Withdrawals cannot be processed until all KYC requirements are fulfilled.

6. Data Protection and Record Keeping

6.1 All KYC data is encrypted and stored on GDPR-compliant servers in the EU.

6.2 Records retained for minimum five (5) years after termination of the relationship.

6.3 Games & More B.V. is data controller; Sumsb is data processor under a DPA.

7. Reporting Obligations

7.1 All unusual or suspicious transactions identified through KYC must be reported to the FIU Curaçao under NORUT.

7.2 MLRO reviews Sumsb alerts and submits reports via goAML.

8. Responsibilities

8.1 Board of Directors: Oversight and approval of KYC Policy.

8.2 Compliance Officer/MLRO: Ensures compliance with LOK, NOIS, NORUT.

8.3 Sumsb: Executes outsourced KYC processes and provides alerts.

8.4 Customer Support: Ensures no withdrawals until KYC completion.

9. Training and Awareness

9.1 All customer-facing staff must be trained in:

- KYC obligations
- Identifying suspicious activity
- Escalation procedures to MLRO.

10. Review and Audit

10.1 Policy reviewed annually or upon regulatory changes.

10.2 Independent audits of Sumsb integration conducted at least every 24 months.

Annex A – Domains Operated by Games & More B.V.

- Masterbets365.com
- Chipstars.bet
- Aciertala.com
- Sellatuparley.com
- Universalrace.net
- Databet.ec
- Winss.bet
- Pixrede.com
- Cariocabet.net
- Granposeidon.com
- Bet502.com
- Jogarapido.com
- Azarlatino.com
- Stockpokeronline.com
- Palace.poker
- Mas1x2.com
- Casinozeus.fun
- Quartzplay.com
- Vipsportsbook.com
- Beterix.com
- Voyganando.net

- Online365bet.com
- Azarlatino.io
- Fixplay.pe
- Coyoteplay.pe
- Betconnections.com
- Bacanbet.com
- Juegaenlineachile.com
- Juegaenlinea.net
- 1x2play.bet
- Betmoosh.com
- Jugalobien.com
- Gloobet.com
- Cripto365.com
- Certero.bet
- Winbet90.com
- Elbochincheapuestas.bet
- Betbrave.com
- Azarlatino.ec
- Boliwin.com
- Bet593.online
- Betpro.hn
- Astrobat.ec
- Loterianacional.ec
- Apolobet.fun
- Apolobet.com

Annex B – Sumsb KYC and Verification Services

Games & More B.V. outsources KYC and AML services to Sumsb Tech Ltd. Services include:

- ID Document Verification
- Liveness & Face Match
- Proof of Address Verification
- Geolocation as Proof of Address
- Sanctions, PEP & Watchlist Screening
- Ongoing AML Monitoring
- Email & Phone Verification with Risk Assessment
- IP Address Analysis
- Payment Method Verification
- Crypto Transaction Monitoring
- Fraud Detection & Behavioural Risk Scoring

All outsourced checks are integrated into Games & More B.V.'s compliance framework.

Complaints regarding verification outcomes or AML checks are covered by the Player Complaints Policy and may be escalated to ADR if unresolved.