

Nova Data Solutions B.V.

Business Plan Version: 1.1

Ruhul Amin

TABLE OF CONTENTS

1. Overview of Business, Products & Services
 2. Management Structure & Key Roles
 3. Three-Year Financial Forecast
 4. Business Strategy & Market Approach
 5. Key Suppliers & Material Dependencies
 6. Risk Evaluation & Management
 7. Legal & Governance Framework
 8. Business Objectives & KPIs
 9. Policies & Procedures
-

1. OVERVIEW OF THE BUSINESS, PRODUCTS & SERVICES

Nova Data Solutions B.V. was incorporated in December 2023. The company operates as a **multi-brand incubation hub**, building and managing online casino brands in partnership with third-party marketing specialists.

Many small teams in emerging markets excel at customer acquisition but lack the technical, operational, or regulatory capacity to operate an online gaming platform. Nova fills this gap by providing the entire operational backbone:

- full platform operations;
- game content via BetConstruct;
- website configuration and brand management;
- technical setup and maintenance;
- payment system integrations;
- reporting, reconciliation, and risk tools.

Marketing, customer acquisition, and first-line support are performed by third-party partners under **revenue-share agreements**. Nova retains oversight, platform control, compliance responsibility, and revenue distribution.

This model allows Nova to operate multiple brands efficiently without the cost structure of a traditional operator, giving it flexibility and scale advantages.

2. MANAGEMENT STRUCTURE & KEY ROLES

2.1 Ownership

Nova is 100% owned by **Mr. Ruhul Amin**, who also owns Star Design Solutions B.V., a separate Curaçao-licensed gaming entity. His experience in brand development, marketing coordination, and platform management provides the operational foundation for Nova's incubation model.

2.2 Corporate Service Provider (CSP)

The company appoints **Capital Trust Corporation N.V. (CTC)** as its director and corporate services provider.

CTC provides:

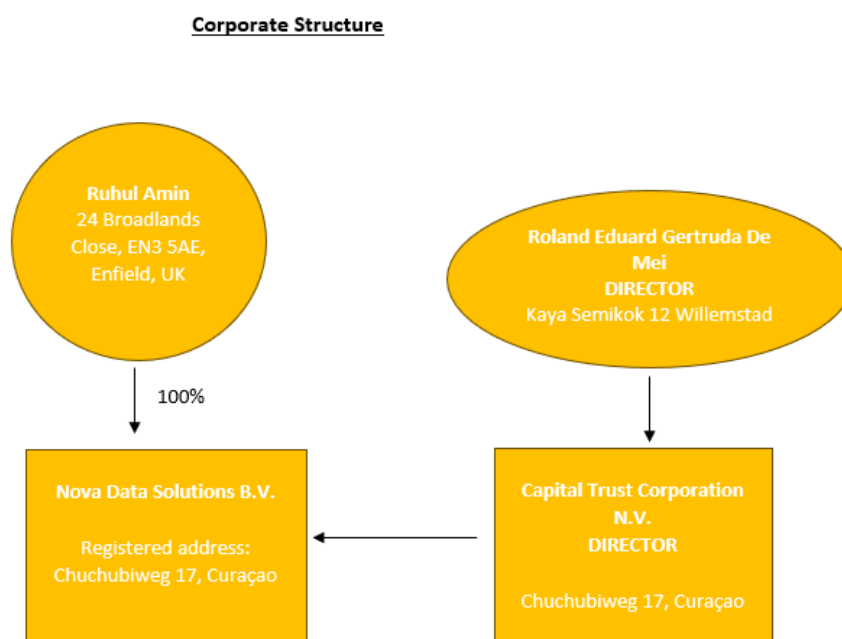
- statutory directorship;
- corporate governance;
- filings and administration;
- local substance;
- compliance oversight.

2.3 Outsourced Functions

Due to Nova's scalable model, several functions are outsourced:

- **Compliance Support:** external specialists support AML/KYC reviews, monitoring, and policy updates;
- **Technical Infrastructure:** fully provided by BetConstruct;
- **Marketing & Support:** managed by third-party acquisition partners under revenue-share arrangements.
-

2.4 Organisational Structure



3. THREE-YEAR FINANCIAL FORECAST

Nova's financial model remains deliberately lean. The company's operational costs are low due to its reliance on third-party marketing partners and the BetConstruct platform. Revenues are generated from multiple small brands, each contributing incremental NGR over time.

All projections reflect:

- no external loans;
- no debt financing;
- full self-funding by the UBO;
- revenue-share marketing model;
- stable cost base;
- controlled expansion.

3.1 Initial Investment

Item	Cost (EUR)
Company incorporation & CSP onboarding	12,000
Gaming license fees	14,500
Platform onboarding fee	4,000
Legal, compliance & configuration	2,000
Total Initial Investment	32,500

3.2 Revenue Model

Nova earns a share of Net Gaming Revenue from partners operating under revenue-share agreements. The company:

- does not fund marketing directly;
- does not require in-house customer support;
- scales through additional brands and partner groups;
- grows turnover through brand diversification.

3.3 Three-Year Projection Summary

Metric	Year 1	Year 2	Year 3
Estimated Gross Wagers	€1.8M	€5.5M	€9.5M
Net Gaming Revenue (NGR)	€80,000	€210,000	€345,000
Platform Fees (BetConstruct)	-€32,000	-€84,000	-€138,000
Affiliate/Marketing Partner Share	-€24,000	-€63,000	-€105,000
PSP Fees	-€9,500	-€22,000	-€36,000
Compliance, Admin & CSP	-€27,500	-€27,500	-€27,500
GCB Licence Maintenance & Legal	-€9,000	-€9,000	-€9,000
Misc. Operating Costs	-€4,000	-€5,000	-€6,000
Net Profit	-€26,000	€-900	€23,500

3.4 Key Financial Considerations

BetConstruct Fees (~38–40% of NGR):

Includes platform access, hosting, integrations, reporting dashboards, risk tools, and content.

Partner Revenue Share (28–32% of NGR):

Paid only on delivered results; no fixed marketing cost exposure.

PSP Fees (5–6% of deposits):

Reflects local payment channels used in the Turkish market.

Operating Costs:

Remain proportional to the number of brands and do not scale linearly with revenue.

3.5 Profitability Outlook

Nova is expected to:

- operate at a controlled loss in Year 1 (due to modest traffic and first-time setup costs);
- move toward breakeven by Year 2;
- generate stable profitability in Year 3 as multiple brands mature.

4. BUSINESS STRATEGY & MARKET APPROACH

4.1 Multi-Brand Growth

Nova's scaling strategy relies on launching many small brands rather than one large flagship brand. This allows:

- diversification of risk;
- multiple acquisition styles;
- appeal to varied design and UX preferences;
- capture of incremental player behaviour differences.

Because BetConstruct centralises operations, managing multiple brands requires limited incremental effort.

4.2 Partner-Driven Marketing Model

Each brand is connected to its own marketing partner. Benefits include:

- no upfront marketing cost;
- partner assumes acquisition risk;
- multiple strategies increase resilience;
- weak partners can be replaced without impacting the overall portfolio.

4.3 Market Focus

Nova focuses on markets where online gaming demand is high and traffic groups are active. Marketing spend is always performance-based.

4.4 Long-Term Strategy

- gradual increase in the number of brands;
- reinvestment of profits into operational improvements;
- potentially onboarding additional platform providers in the future;
- expansion into adjacent markets once regulatory conditions permit.

5. KEY SUPPLIERS & MATERIAL DEPENDENCIES

5.1 BetConstruct

BetConstruct provides the full operational environment:

- casino games & live dealer content;
- RNG certifications;
- hosting & server infrastructure;
- reporting and analytics;
- risk and monitoring tools.

Because BetConstruct is an established provider with licences in multiple jurisdictions, Nova views this dependency as acceptable and operationally efficient.

5.2 Payment Service Providers (PSPs)

PSPs will be engaged after licensing approval. Nova will select PSPs that:

- support preferred local payment methods;
- offer secure routing;
- maintain stable processing rates;
- provide AML-appropriate controls.

5.3 Third-Party Marketing Partners

Each brand has its own partner that manages:

- marketing;
- customer acquisition;
- first-line support.

Nova controls brand integrity and ensures partners comply with responsible marketing requirements.

6. RISK EVALUATION & MANAGEMENT

6.1 Key Risks

- **Marketing Underperformance:** managed by using multiple partners and discontinuing weak brands.
- **Platform Dependency:** mitigated through reliance on BetConstruct's established compliance and infrastructure.
- **PSP Disruption:** reduced by maintaining multiple PSP integrations.
- **Operational Risk:** centralised oversight through the UBO and CSP.
- **Regulatory Risk:** addressed through external compliance support and updated policy frameworks.

6.2 Monitoring & Mitigation

- Monthly brand performance analysis
- Review of PSP approval rates
- Monitoring for suspicious player activity
- Sanctions and PEP screening
- Updating policies in line with CGA guidance

7. LEGAL & GOVERNANCE FRAMEWORK

The company is governed by:

- **UBO:** Ruhul Amin
- **Local Director:** CTC (Corporate Service Provider)

CTC ensures local presence, governance, and adherence to Curaçao company law. The UBO retains strategic authority, while material corporate actions are taken jointly.

Legal support is sourced from Curaçao law firms as required.

8. BUSINESS OBJECTIVES & KPIs

Short-Term Objectives

- Launch and stabilise the initial brand portfolio
- Build technical consistency and reporting routines
- Establish PSP connections

Medium-Term Objectives

- Achieve breakeven
- Introduce additional brands
- Strengthen partner quality and retention metrics

Long-Term Objectives

- Maintain a diversified portfolio of profitable brands
- Expand selectively into similar markets
- Increase operational resilience and automation

KPIs

- Net Gaming Revenue per brand
- Deposit conversion ratios
- PSP success and failure rates
- Retention and player value metrics
- Revenue-share partner performance
- Cost-per-brand operational efficiency

9. POLICIES & PROCEDURES

Nova maintains the following policies:

- AML/CFT Policy
- KYC & Player Verification Policy
- Responsible Gaming Policy
- Complaints & Disputes Procedure
- Terms & Conditions
- Privacy Policy

All policies are periodically reviewed with external compliance specialists to ensure alignment with regulatory expectations and operational developments.