

Gambling with responsibility

Please read this information carefully for your own benefit.

1. INTERPRETATION AND DEFINITIONS

The words of which the initial letter is capitalized have meanings defined under the following conditions.

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

For the purposes of these Terms and Conditions:

Account means a unique account created for You to access our Service or parts of our Service.

Company/Operator (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Esti Technologies N.V.

Games of Chance means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker

LOK is the National Ordinance on Games of Chance law of Curacao.

Marketing, promotion and advertising refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and

other media advertising content marketing, digital marketing, and social media campaigns.

Service refers to the Website.

Self-exclusion is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator. That self-exclusion should apply across all domains and brands operated by the same operator.

Vulnerable Person is defined in the Clause 1.1 (h) of the LOK as

1. Under eighteen years of age.
2. Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people.
3. Has been banned from playing any Game of Chance either by force or at his or her own request.
4. Has been declared bankrupt.

Website refers to licensed website of the Operator.

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

2. RESPONSIBLE GAMBLING AND SELF EXCLUSION

Gambling means for the majority of our Users, entertainment, fun and excitement. But we also know that for some of our Users gambling has negative side effects. In the medical science is pathologic gambling since many years as serious sickness recognised.

Since our first day we think about this problematic and try out best to help. Under "Responsible Gambling" We understand multiple steps of measures, with which a gambling provider can help to lower the possibility of negative side effects appearing. -In case they already appear we also try to take active steps against them.

The most important instrument against negative side effects from gambling are knowledge and education about the risks of gambling too support our Users self-control in order to make sure they do not suffer from negative side effects.

3. AGE VERIFICATION

The Operator has strict age verification processes in place to prevent underage gambling.

Players must confirm they are of legal gambling age before they can deposit or play.

Age Verification Requirements

- Operator implements rigorous age verification processes to ensure that all participants are of legal gambling age. Players must not be able to deposit or place wagers unless the operator is satisfied that the player is 18 or older.
- During account registration, the operator verifies that the player is not a minor through Date of Birth confirmation (and also if possible open source verification, an *I am over 18* tick box, and confirmation of payment method e.g. Credit card). If the verification process determines that a player is underage or the operator has reason to suspect the player is underage, then access must be denied, and appropriate actions must be taken. Excepting any funds frozen in accordance with the AML policy any funds deposited by a minor must be returned, and any winnings must be forfeited. The operator should clearly communicate the reasons for account closure to the minor.
- Age verification is subject to the CGA's Know Your Customer and AML policies and should at a minimum include a government-issued valid ID check (such as a passport, national ID, or driver's license). If the operator has any doubt whatsoever of a player's age prior to KYC or AML milestones being reached, age verification should be undertaken at that point.
- If necessary, secondary verification methods, such as proof of address, selfie verification, or third-party database checks, should be employed.
- Operator maintains records of all age verification attempts and their outcomes. These records must be made available for regulatory review.

4. BEHAVIOUR TRACKING

Active monitoring detects signs of problematic gambling. By analysing deposit activity, betting patterns, session durations, and player interactions, the operator can identify at-risk individuals and take proactive steps to prevent gambling-related harm. This is also relevant in connection with Article 1.4(e) LOK that prohibits the operator to give a person who must within reason be assumed to be a vulnerable person, the opportunity to play games of chance.

Behaviour tracking is typically undertaken by frontline staff (such as customer services or VIP managers) as they are in the best position to identify problematic behaviour through patterns and direct interactions. A structured process on flagging potential vulnerable gamblers may serve as a trigger for a more detailed behavioural analysis and should be included in the Responsible Gaming policy itself.

Key monitoring factors

- Deposit and wagering frequency – sudden increases or erratic deposit, wagering or gaming session patterns.
- Use of multiple payment methods – particularly attempts to bypass limits.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- Extended play sessions – prolonged gaming without breaks.
- Increased communication with customer support – including requests for bonuses or signs of agitation.
- Frequent changes to responsible gaming tools – such as continuously increasing deposit or loss limits or repeatedly making use of cooling-off period.
- Players under 25 years old spending substantial amounts, particularly on casino or virtual games.

- Players maxing out a credit card and attempting to register additional cards.
- Unrealistic spending patterns that do not align with the player's demographic profile.
- Attempts to open multiple accounts to bypass deposit or loss limits.

5. PROCEDURES FOR PLAYER IDENTIFICATION AND INTERVENTION

Operators must have a structured process for responding to problem gambling behaviour identified.

This process includes:

1. Player Profiling and Risk Assessment

- Operators must establish player profiles with relevant data points to assess individual risk levels.
- Behavioural risk factors should be continuously monitored, with real-time alerts for concerning activity.

2. Direct Player Interaction

- When concerning behaviour is identified, the operator must initiate direct contact with the player via trained responsible gaming professionals.
- This interaction should be documented within the operators Player Account Management system, including indicators of concern and actions taken.

3. Responsible Gaming Interventions

- Players exhibiting at-risk behaviour must be informed about responsible gaming tools, including deposit limits, time-outs, and self-exclusion.
- Operators must have clear guidelines for escalating concerns, which may involve:

- Applying deposit limits to the player's account.
- Temporarily suspending access pending further review.
- Excluding the player in cases of extreme risk.

6. STAFF TRAINING

Operators train customer service and responsible gaming staff to handle player interactions professionally and effectively.

Training should cover:

- Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate support resources and responsible gaming tools.
- Ensuring all interactions are documented for compliance and follow-up action.

7. ESCALATION

Any problematic behaviour identified will be escalated to the Compliance Officer who shall assess each case and determine whether further restrictions, exclusions, or responsible gaming interventions are necessary.

8. COOLING OFF

The cooling-off period is easily accessible. For now the Operator provides this service manually until a technological solution is available.

The operator offers players the option to activate a 24-hour, a 7-day, 1 month or 3 month

cooling-off period, during which they are temporarily restricted from gambling. The Cooling-off may be selected by the player by any combination of one, more or all of the product verticals offered by the operator (for example Slots, Table Games, Fixed Odds Betting, Poker and other P2P games).

Once a player selects the cooling-off option:

- The player must be made aware of the difference between Cooling Off period and Self-Exclusion and must be offered the opportunity to proceed directly to Self-Exclusion if they so choose.
- It must take effect immediately.
- The player's account must be locked, preventing any participation in gambling activities for the full period selected by the player.
- The player must be given the option to enhance their own protection by opting-out of the marketing database during their cooling-off period.

The operator will not discourage players from activating the cooling-off period by:

- Questioning their decision.
- Offering reassurances to delay the process.
- Providing bonuses or promotions as incentives to continue playing.

After the cooling off period has expired, the player's account must be automatically reactivated, allowing them to resume gameplay without needing further action.

9. SELF-EXCLUSION:

In case You are diagnosed with a gambling addiction or try to stay away from gambling for a different reason, we want to assist you to stay away from anything, that does nothing good for you. "Self-Exclusion" means, that You exclude yourself, out of Your own choice, from all gambling services. This exclusion cannot be undone for a set amount of time. If you wish to self-exclude yourself from gambling, please message our support and give them a time span between periods of 1 year, with additional options for 3 years, 5 years, 10 years, and lifetime exclusion. They also will explain you all future steps and what is needed from you.

In accordance with Clause 5.4(2) of the LOK, operators must offer a long-term self-exclusion periods of 1 year, with additional options for 3 years, 5 years, 10 years, and lifetime exclusion

- Once a self-exclusion request is submitted, it must take effect immediately.
- The operator must not discourage self-exclusion by questioning the player's decision, offering reassurances, providing bonuses, or delaying the process in any way.
- Once self-exclusion is confirmed, it cannot be revoked by the player before the exclusion period ends.
- Self-exclusion may be selected by the player by any combination of one, more or all of the product verticals offered by the operator (for example Slots, Table Games, Fixed Odds Betting, Poker and other P2P games).

Financial and Account Management

Upon activation of total self-exclusion of all verticals:

- All gambling-related transactions will be blocked immediately.
- The player's account will be deactivated, preventing further play.
- Excepting any funds frozen in accordance with the AML policy any remaining funds in the player's account shall be refunded to the original payment method within two business days (subject to AML policy requirements).
- The operator will permanently remove the player's data from all marketing and promotional lists.

Upon activation of self-exclusion of one or more (but not all verticals)

- Game play and wagering must be totally restricted in accordance with the player's

preferences.

Reactivation and Post-Exclusion Protocol

After the self-exclusion period ends, the operator will require the player to confirm in writing their request before unblocking the account. In addition the operator will provide a message regarding responsible gaming, remind the player of the safeguards that are in place and encourage the player to complete gambling anonymous questionnaire. The player's gaming history will be preserved, and the account must be restored only under their original credentials.

Marketing and Contact Restrictions

During and after the self-exclusion period (for one or more or all verticals):

- The operator will not contact the self-excluded player under during the period of exclusion, excepting any third party, legal or other non-marketing messaging required.
- The operator will send not promotional materials or encourage the player to resume gambling by offering free play, bonuses, or any other incentives.
- Cooling off periods end automatically, however after Self Exclusion the decision to resume play must be entirely initiated by the player.

Compliance and Regulatory

If a self-excluded individual or minor is found to have accessed gambling beyond their self-exclusion choices, the operator must:

- Excepting any funds frozen in accordance with the AML policy refund all deposited amounts to the player within two business days.
- Immediately block the player's account to prevent further play.
- Submit a detailed report to the CGA within five working days, outlining how the issue occurred and what actions are being taken to prevent recurrence.

Operator-Initiated Exclusion

The operator may exclude a player as a high-risk intervention measure if:

The player displays problematic gambling behaviour.

- The player attempts or engages in criminal activities through the operator's platform.
- Operator-initiated exclusions must be formally documented, and records must be kept for at least five years. The CGA may request these records at any time.

email: support@punch.bet

Please keep in mind that Self Exclusion is permanent for the set time span and will not be undone for your own protection.

During Self Exclusion you are not allowed to create a new Account and every attempt to create a new Account during Self Exclusion is a violation of our Terms of Service and may result in the permanent ban of your original account.

10. LIMITS

The operator can offer the player with tools to control their gambling activity by setting deposit limits. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

Players can make their limits more stringent at any time, and such changes take effect immediately.

Deposit Limits

- Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).
- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.

- Any request to reduce a deposit limit takes effect immediately, while requests to increase a limit are subject to a seven-day waiting period before implementation.

Other Limits

In line with the operators target player and/or market, other limits may be considered including loss limits, time limits or wager limits.

Exceptions to Limits and Exclusions

A limit or exclusion has the potential to affect active wagering – including, but not limited to:

- A time limit set when a player is active in a poker tournament.
- A limit or exclusion when a player has an unresolved ante-poste bet on a future event.

In these situations the restrictions as outlined above must be honoured immediately with the exception of the active gameplay or wager(s). Upon completion of the relevant tournaments, wagers or events the restrictions apply.

11. REALITY CHECK

Reality check measures include, but are not limited to:

1. A real-time session timer that remains visible at all times while the player is logged in.
2. Player-Activated Reality Checks. Players may have the option to set customized reality check alerts at specific time intervals. When triggered, it requires the player to confirm that they have read the message before resuming play and offers the option to end the session or continue playing.

Customised Reality Checks must suspend play momentarily and required the player to confirm they have read the message before resuming play.

Custom messages may include

- Clearly indicate how long the player has been playing.
- Display the player's winnings and losses during that period.

12. INFORMATION AND CONTACT

Our Support will help you via email at all time without any additional costs for you - email: support@punch.bet

Our Support will of course not give out any information about You without Your consent to anyone else

In addition you also can take a self-test, if You are already gambling addicted at: <https://www.begambleaware.org/gambling-problems/do-i-have-a-gambling-problem/>

And you can also find additional information about gambling addictions at: <https://www.begambleaware.org/safer-gambling/>

13. HELPFUL HINTS FOR RESPONSIBLE GAMBLING AT WEBSITE

We recommend you think about the following hints, before gambling in order to insure gambling stays fun for You and without any negative side effects:

- Set yourself a deposit limit.
Before you start to gambling think about how much you can afford to gamble with according to Your financial situation. Play with amounts which are for fun and for Your entertainment.
- Do not try to win back a loss at every cost.
Try to not take to huge risks to win back what You lost before at any cost. Play for Entertainment and not to earn money.
- Set yourself a time limit
Set yourself a time limit and do not break it. Keep in mind gambling should stay in balance with your other hobbies and not be Your only hobby.
- Play smart:

It is smarter to not play, when You are extremely stressed, depressed or under too much pressure. Also do not play when you are under the influence of Medications, Drugs or Alcohol.

- Take breaks:
You should take breaks when You notice, that You get tired or can't concentrate anymore
- Only one account:
To make it easier to have an overview how much time and money You spend on gambling it is highly advised to not create more than one Account per Person.

14. MINOR PROTECTION

To use our Service, You have to reach 18 years or a higher minimum legal age as stipulated in the jurisdiction of your residence under the laws applicable to you. To avoid abuse, keep Your login data safe from any minors near You.

Principally we recommend a filter program to avoid minors, especially children, to access any context on the internet, which is not healthy for them.

For parents we can recommend a list of internet filters, to support them, from keeping their children from any context, which was not made for them: <https://famisafe.wondershare.com/internet-filter/best-internet-filters.html>

While there are myriad options available globally, the following third-party tools are examples that are available for parental control and website blocking:

Net Nanny – www.netnanny.com

GamBlock – www.gamblock.com

CyberSitter – www.cybersitter.com