

Cryptocurrency Policy

1. Purpose & Scope

This Cryptocurrency Policy outlines the principles, rules, and procedures for the acceptance, use, and management of cryptocurrencies at <Brand>. It ensures compliance with Curaçao gambling regulations and promotes responsible gaming, financial transparency, and data security.

This policy applies to all stakeholders, including management, employees, and players, engaging with cryptocurrencies on the <Brand> platform.

2. Authorized Cryptocurrencies

- Only cryptocurrencies approved by Curaçao's gambling regulatory authority will be accepted.
- Initially, Bitcoin (BTC), Ethereum (ETH), and other approved cryptocurrency tokens will be supported.
- The list of accepted cryptocurrencies will be reviewed and updated regularly to comply with evolving regulations.

3. Wallet Management

- <Brand> employs secure, licensed custodial wallet providers to store player funds.
- Players may use their non-custodial wallets for deposits but must adhere to identification procedures.

4. Know Your Customer (KYC) and Anti-Money Laundering (AML)

4.1. Identity Verification

- All cryptocurrency users must undergo KYC verification, including proof of identity, address, and wallet ownership.

4.2. Source of Funds

- Players must declare the source of their cryptocurrency funds to prevent illicit activities, when requested to do so.
- Enhanced due diligence will be conducted for high-value transactions exceeding € 2000 or its equivalent. This may include, but is not limited to the following:
 - Additional proof of address and additional government-issued identification documentation

- Direct call, cross call, or a request for additional for alternative identity confirmation items, such as IDCP (ID confirmation photo, which is a photo of the account holder with his/her ID document present) or notarized identity verification document, certified by a notary, should that be deemed necessary.
- Additional/alternative proof of wallet ownership (e.g., signed messages, blockchain receipts, etc.).
- Documentation confirming the transaction history of the cryptocurrency wallet.
- Information and documentation confirming the origin of the cryptocurrency funds (trading, mining, inheritance etc.)
- If a customer refuses to provide the information and/or documents described above when requested, or appears to have intentionally provided misleading information, after taking under consideration the risks involved, <Brand> reserves the right to suspend the customer account, void all wagers and withhold or decline further payment, or terminate the business relationship in its entirety voiding all wagers and potentially fraudulent winnings and settling outstanding deposit funds back to their original source, as determined by the company in its sole and absolute discretion.

4.3. Blockchain Analysis

- Transactions will be monitored using blockchain analytics tools to detect patterns indicative of money laundering, fraud, or other illegal activities.

5. Deposits and Withdrawals

- Deposits are considered final and non-reversible after blockchain confirmation.
- Funds originating from cryptocurrency deposits can only be withdrawn via cryptocurrency withdrawal.
- Withdrawals in cryptocurrency will only be processed to the verified wallet address provided during KYC.
- Withdrawal requests will be subject to internal checks and may require additional verification.

6. Transaction Limits

- Minimum and maximum transaction limits for deposits and withdrawals are:
 - **Minimum Deposit:** € 10 or equivalent
 - **Maximum Withdrawal per Day:** € 5,000 or its equivalent

- All limits will comply with regulations and internal risk assessments.

7. Data Privacy and Security

- Cryptocurrency transactions are recorded and stored in compliance with data protection regulations.
 - Player information will not be shared with third parties unless required by law.
 - Multi-signature wallets and two-factor authentication (2FA) will be mandatory for all administrative transactions.
 - Regular audits of wallets and transaction records will be conducted.
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8. Responsible Gambling

- Players using cryptocurrency must adhere to the responsible gambling measures in place.
- All relevant responsible gambling tools, limits, and time restrictions apply equally to cryptocurrency users.

9. Dispute Resolution

- Any disputes related to cryptocurrency transactions will be addressed through the established dispute resolution mechanism, as detailed in the <Brand> Dispute Resolution page.

10. Policy Review

- This policy will be reviewed bi-annually and updated as needed to ensure alignment with Curaçao regulations and technological advancements.
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Contact Information

For questions regarding this Cryptocurrency Policy, please contact <Brand> at support@<Brand>.com.