

Usoftgaming N.V.

Know Your Customer Policy

Identification and Verification of the Customer

During the identification process players will be requested to submit documentation to the compliance team. This information is collected during the registration process. The personal information to be collected is to start off the Know Your Client (KYC) process, which includes the collection of the following personal details:

- Name and surname
- Permanent residential address
- Date of birth, as the player must be over eighteen years of age (*or legal age as applicable in the player's particular country*)
- Valid email address
- Gender
- Country of Residence

Once the email is validated as current/active and an active email the account is then opened.

Once the above information is provided and the player has successfully created his account, and before making their first deposit, Usoftgaming N.V. will first check whether the individual in question is a PEP, a family member of the PEP, or a close business associate of the PEP.

A reliable electronic database, such as Company Advantage, is used. At the same time the team also runs the player through minFraud, riskScore from Maxmind to determine certain risk attributes and perform screening against relevant sanctions lists. The data within the Comply Advantage database which is currently used through our third-party service provider is derived from information on sanctions watch or regulatory and law enforcement lists. And Maxmind helps us by using risk scoring and data to identify high-risk activity in

e-commerce payments, platform user activity, incentivized traffic, and more. And also specialize in GeolP intelligence for compliance, fraud detection, security and more.

Comply Advantage data consists of PEP information as well as information about individuals and entities not found on official lists but who instead are reported to be connected to sanctioned parties or reported to have been investigated for, or convicted of engaging in, financial crime, slavery, and human abuse-related activities (SIP and SIE). Comply Advantage also forms profiles with unfavorable information (risk data) on public and private entities. The information is found in adverse media, or negative news: these are both 'traditional' news outlets, niche media organizations, government and regulatory press releases, and reliable blogs.

Therefor by using these 3rd party tools we can establish a lot about the player from the very beginning.

If a true match against sanctions hit is confirmed, Usoftgaming N.V. must immediately proceed with freezing the funds of the particular customer(s) (if applicable), in accordance with the Sanctions Ordinance, and in any case must immediately file a report with the FIU. Once the true match is confirmed by the supervisory authority, Usoftgaming N.V. shall terminate services and keep the frozen assets until further instruction from the supervisory authority, or otherwise, in light of tipping off considerations, follow instructions from the supervisory authority.

If it is determined that an individual is a PEP or in any way related to a PEP, then the individual will be deemed himself / herself a PEP and will not be allowed to deposit the money as a player with Usoftgaming N.V. and would be blocked at the deposit level. The account will be followed by permanent closure. This therefore means that determination as to whether an individual is a PEP (as per above definition) will take place after the registration stage, but before the first deposit.

In any situation where the player is immediately identified as being high risk, Usoftgaming N.V. may immediately ask for additional personal details and for their verification. In any case, Usoftgaming N.V. will ensure that it is always able to determine that the player is who he claims to be and that the measures adopted are effective enough to counteract the risk of identity fraud and impersonation.

For example, the team may request a video call with the player to assure its truly them. And in some cases, has asked the players to visit local registered notaries to get identification documents notarized.

Verification consists in confirming the personal details collected for identification purposes using independent data, information and documentation obtained from reliable sources. If inconsistencies in the personal information provided by the

player are identified, Usoftgaming N.V. will consider whether to adopt additional identification and verification measures. This will take place by either of two ways:

Verification through documentary sources

Only documents issued by government agencies that include a photograph are deemed reliable for verifying the customer's identity. Documents issued by the government that lack a photograph can be used to confirm the customer's current address, provided the address is included in the document. Usoftgaming N.V. accepts as proof of permanent residential address copy of utility bill (e.g. electricity, water, gas, telephone landline)¹ or bank statements, as long as they are not older than 3 months at the time they are received.

If the player's residential address cannot be verified by using any one of the just mentioned documents, Usoftgaming N.V. will ask for alternative reliable documents such as a recent bank statement, Government tax documents or other documents depending on the players situation, to assure we can 100% establish the players' current address.

The documents requested will be received by email and if deemed necessary notarized documents may be requested from time to time.

Usoftgaming N.V. will ensure that all documents received are clear and readable documents and are authentic or reflect authentic ones. Some documents, such as passports may be easier to verify as these can be checked against online databases. In other cases, such as with regards to utility bills, the verification process may be less easy to establish but notarized utility is something our team is gravitating too more and more.

In respect of the validity of the information provided, Usoftgaming N.V. will also consider other data that is collected from the player such as geo-location, IP address data via MaxMind, that should under normal circumstances back up the data obtained in the documents provided by the player.

There will be exceptions, where the IP address will not tally with the country / location, this is something our team is aware of and specialize in. Such instances need to be checked on a case-by-case basis and during verification some questions will be asked to the player for clarification.

Electronic means

Sources like E-ID or Bank-ID and electronic commercial databases are used as well. Usoftgaming N.V. is well aware that the reliability of these databases may

not always be the most accurate. In this regard it will consider what source of information is feeding into the database and whether such data is generally known to be maintained or accurate.

When using electronic databases, Usoftgaming N.V. will also make use of other documentary evidence for better accuracy. This is because a positive result on the electronic database will only mean that there is an individual whose personal details correspond to those provided by the client, but not that the client is that individual, its simply an extra piece we use in process but not something we can take at face value.