

Purple Bay B.V.

Purple Bay B.V.
Korporaalweg 10,
Willemstad
Curacao

Responsible Gaming Policy

1. Introduction

At Purple Bay B.V. we are committed to promoting responsible gambling and providing a safe and fair environment for our players. Our Responsible Gaming Policy outlines the measures we have in place to protect vulnerable players, prevent underage gambling, and support individuals experiencing problem gambling. This policy is maintained in accordance with the regulatory expectations and applicable responsible gaming requirements of the Curaçao Gaming Authority (CGA)

2. Our Commitment

We recognize that while gambling is a form of entertainment for most players, a small percentage may experience problems.

Our goal is to provide players with the tools and support necessary to gamble responsibly.

We ensure that all aspects of our operation reflect this commitment, from marketing to customer support, to technical safeguards.

3. Player Protection Tools

On all Purple Bay B.V. brands, we offer a suite of responsible gambling tools that empower players to control their gambling activities:

3.1 Self-Exclusion

- Players may request a self-exclusion from our platform by contacting customer support.
- Self-exclusion periods are determined by the player and can range from 6 months to permanent.
- During the exclusion period, the player's account will be suspended and inaccessible.
- The account will not be reactivated until the selected exclusion period has ended.

3.2 Cooling-Off Periods

- Players may request temporary account suspension ("cool-off") for a shorter period (e.g., 24 hours to 6 months).
- During this time, no gambling activity is permitted.

3.3 Deposit Limits

- Players may request deposit limits to be applied to their account on a daily, weekly, or monthly basis.
- Any decrease to a deposit limit shall take effect immediately.
- Requests to increase or remove deposit limits may be subject to a cooling-off period before becoming effective.
- Purple Bay B.V. may also apply mandatory limits or restrictions where responsible gambling concerns are identified.

3.4 Other Responsible Gambling Limits

In addition to deposit limits, Purple Bay B.V. offers additional responsible gambling controls, including but not limited to:

- Loss limits
- Wager limits
- Session time limits
- Reality checks
- Account activity reminders

Such limits may be implemented in line with the operator's target player demographic, risk appetite, jurisdictional obligations, and Responsible Gambling framework.

4. Preventing Underage Gambling

- We prohibit access to our platform by individuals under the age of 18 or the legal age in the player's jurisdiction (whichever is higher).
- We implement age verification procedures during registration.
- Any account found to be registered by an underage person will be terminated and any associated winnings forfeited.

5. Responsible Gambling Monitoring and Risk Management

5.1 Player Profiling and Risk Assessment

Purple Bay B.V. applies a risk-based approach ("RBA") to Responsible Gambling monitoring and intervention.

Players may be profiled and assessed according to behavioural, transactional, and communication-based indicators to determine potential gambling-related harm risks.

Risk assessments may categorize players into varying levels, including:

- Low Risk
- Medium Risk
- High Risk
- Vulnerable Player

Player profiles are continuously monitored and updated based on account activity and behavioural indicators.

5.2 Monitoring and Intervention

Purple Bay B.V. adopts a Risk-Based Approach (“RBA”) to determine the level of monitoring and intervention required for each individual player.

Monitoring measures may include automated systems, manual reviews, behavioural analytics, and customer interaction reviews.

Intervention measures may include:

- Responsible Gambling notifications
- Temporary restrictions
- Cooling-off recommendations
- Direct customer contact
- Mandatory affordability or source-of-funds reviews
- Suspension or closure of accounts where necessary

5.3 Indicators of Problem Gambling

Purple Bay B.V. maintains structured procedures to identify and respond to indicators of problem gambling behaviour.

Key monitoring indicators include, but are not limited to:

- Unusual deposit or wagering frequency
- Repeated failed transactions due to insufficient funds
- Reversing withdrawal requests
- Patterns of extended or continuous play sessions

- Excessive or unreasonable communication with customer support, including repeated bonus requests
- Frequent changes to Responsible Gambling settings or limits
- Players appearing to max out available payment methods or credit facilities
- Attempts to open multiple accounts to bypass restrictions, deposit limits, or loss limits

Where such indicators are identified, the player may be escalated for Responsible Gambling review and intervention.

5.4 Identification of Vulnerable Persons

Purple Bay B.V. maintains procedures for identifying players who may be considered vulnerable persons.

A Vulnerable Player may include individuals who:

- Exhibit signs of gambling-related harm
- Demonstrate impaired control over gambling activity
- Disclose financial, psychological, or social difficulties
- Appear unable to make informed gambling decisions

Where a player is identified as vulnerable, the operator may:

- Conduct enhanced Responsible Gambling interactions
- Recommend or impose cooling-off measures
- Apply account restrictions
- Suspend promotional activity
- Escalate the account for compliance review
- Suspend or permanently close the account where appropriate

5.5 Initiating Direct Contact

Where player behaviour reasonably suggests potential vulnerability or gambling-related harm, Purple Bay B.V. shall initiate direct contact with the player.

Contact may occur through:

- Email

- Live chat
- Telephone communication
- On-site notifications or pop-up alerts

The purpose of such interactions is to promote safer gambling behaviour, provide Responsible Gambling information, and assess whether additional protective measures are required.

5.6 Notifications for Concerning Behaviour

Purple Bay B.V. may employ automated and/or manual Responsible Gambling notifications in response to concerning behavioural patterns.

Notifications may include:

- Session duration reminders
- Deposit frequency alerts
- Loss notifications
- Responsible Gambling educational messaging
- Recommendations to use player protection tools

5.7 Recording Responsible Gambling Interactions

All Responsible Gambling interactions, interventions, reviews, and player communications are recorded and maintained within the operator's Player Account Management ("PAM") system.

Records are maintained in accordance with applicable regulatory, compliance, and data protection obligations.

5.8 Record-Keeping

Purple Bay B.V. maintains adequate records relating to Responsible Gambling measures, including:

- Customer interactions
- Risk assessments
- Player protection actions

- Self-exclusion requests
- Cooling-off requests
- Monitoring activities
- Internal escalations
- Staff training records

Such records are securely maintained for the period required under applicable Curaçao regulatory and legal obligations.

6. Cooling-Off and Self-Exclusion Measures

6.1 Cooling-Off Options

Players may activate cooling-off periods through customer support or available Responsible Gambling settings.

Cooling-off options may include controls relating to:

- Duration
- Gaming verticals
- Brands or domains
- Marketing communications

The minimum cooling-off duration shall be no less than 24 hours.

During the cooling-off period:

- Gambling activity shall be restricted or suspended
- Marketing communications may be disabled
- Promotional offers shall not be provided

Marketing opt-out functionality shall be available to all players.

6.2 Self-Exclusion

Purple Bay B.V. provides players with the ability to self-exclude from gambling activities for a minimum duration of at least one (1) year.

Longer or permanent self-exclusion options may also be made available.

6.3 Self-Exclusion Applicability

Self-exclusion measures shall apply across all gambling activity operated by Purple Bay B.V., including:

- All brands and domains operated by the licensee
- All gaming verticals
- All player accounts associated with the customer
- All direct marketing communications and promotional materials

During a self-exclusion period:

- Accounts shall remain inaccessible
- No gambling activity shall be permitted
- No marketing communications shall be sent

7. Consumer Advertising and Marketing Standards

Purple Bay B.V. is committed to socially responsible advertising and marketing practices.

The operator shall not engage in irresponsible advertising practices, including:

- Targeting vulnerable persons or underage individuals
- Portraying gambling as a financial investment or guaranteed source of income
- Misrepresenting games of chance as skill-based activities
- Using emotional manipulation or social pressure
- Featuring minors or depicting minors engaging with gambling content
- Using sexually explicit or otherwise inappropriate content
- Encouraging harmful or reckless behaviour unrelated to gambling

All bonuses, promotions, and incentives shall be communicated transparently and fairly.

Bonuses shall not be designed or marketed in a manner that encourages excessive or irresponsible gambling behaviour.

Purple Bay B.V. remains responsible for marketing materials distributed by:

- Affiliates

- Representatives
- Sponsorship partners
- Brand ambassadors
- Social media influencers
- Third-party marketing providers

Any contracted third party involved in advertising or promotion shall be made aware of and expected to comply with the operator's Responsible Gambling Policy.

All advertising and promotional materials shall contain a clearly visible Responsible Gambling message, slogan, or reference to player protection resources.

8. Internet Filtering and Blocking Tools

8.1 Device and Account Safety

Purple Bay B.V. advises players to take precautions when sharing devices with minors or vulnerable individuals.

Players are encouraged to:

- Safeguard usernames and passwords
- Restrict access to payment methods
- Avoid saving login credentials on shared devices
- Utilize parental control or filtering software where appropriate

8.2 Third-Party Blocking Software

Purple Bay B.V. may provide or share links to independent third-party software designed to restrict access to gambling websites.

Examples include:

- BetBlocker – betblocker.org
- GamBlock – gamblock.com
- Gamban – gamban.com

Such tools are provided for informational purposes only and are operated independently from Purple Bay B.V.

9. Policy Review

This Responsible Gaming Policy is reviewed periodically and updated in line with:

- Curaçao regulatory requirements
- Industry best practices
- Internal compliance assessments
- Operational changes
- Emerging Responsible Gambling standards

The operator reserves the right to amend this policy where necessary to ensure ongoing compliance and player protection.