

Responsible Gaming Policy

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This Responsible Gaming Policy is developed by Platinum Technology N.V., a legal entity registered under the laws of Curaçao, with the registration number: 163348 and registered address Zuikertuintjeweg Z/N, Curaçao.

DEFINITIONS

“Website” shall mean the online gaming platform operated by the Company under its Curaçao Gaming Authority license, including any domains or subdomains assigned to such license.

“License” shall mean a license or a temporary certificate, which replaces a license, issued by the Curaçao Gaming Authority (CGA).

“Company” or **“We”** shall mean Platinum Technology N.V.

“Player” shall mean an individual using the Website.

“Self-exclusion” means a player voluntarily barring themselves from all gaming activities.

“Cooling-off” means a temporary restriction from gambling.

“Minor” means any person under 18 years of age.

“Vulnerable Person” includes minors, self-excluded persons, individuals with gambling addiction, or financially vulnerable individuals.

1. INTRODUCTION

1.1 Platinum Technology N.V. undertakes to provide the Player with a safe, fair, and responsible gaming environment on the Website. As a licensed operator under the jurisdiction of Curaçao, we recognize our duty to promote responsible gaming practices and safeguard the Player from potential risks associated with gambling.

1.2 Gambling problems are associated with poor mental health and can manifest in depression, anxiety, and suicidal thoughts. They also have an adverse effect on family relationships, work, and academic performance, and can lead to bankruptcy or crime.

1.3 Gambling should be an enjoyable pastime and not a way to make money.

1.4 Unfortunately, in some cases, abuse of gambling can lead to problems. We take care of our customers and make every effort to provide a safe and reliable service that our customers can use without any damaging consequences.

1.5 The Website maintains a dedicated Responsible Gaming section which is accessible from the homepage and footer, provides access to all responsible gaming tools, and includes contact information and support resources.

2. UNDERAGE GAMBLING

2.1 Platinum Technology N.V. does not allow underage gambling (for persons under the age of 18).

2.2 We do not advertise our products and services to minors or mentally vulnerable people.

2.3 We guarantee that our advertising, sponsorship, and marketing activities do not contain any information aimed at attracting underage persons to the Service.

2.4 If you share your computer with underage persons, you should make sure that they do not have access to usernames, passwords, and banking details.

2.5 We routinely conduct age verification procedures to ensure that all our Players are of legal age. This process involves confirming the player's date of birth by requiring a valid government-issued identification, such as a passport, national ID card, or driver's license. Additionally, we reserve the right to request supplementary documents, such as a selfie or proof of address, and to employ third-party databases for further age verification.

2.6 Availability of personal account may be limited and funds are frozen until we receive the necessary information and the fact that you have reached the legal age will be confirmed unambiguously.

2.7 The legal age for betting and gambling is determined by the laws of your country and is usually 18 years.

2.8 Our customers should understand that they are the guarantors of their legal registration on the Website.

2.9 Accounts identified as belonging to minors will be immediately closed and recorded for compliance purposes.

3. SELF-ASSESSMENT

3.1 It is recommended that the Player regularly analyzes its gambling habits to make sure that your participation in gambling remains within healthy limits. Self-assessment tools are available to help the Player to do this, with a series of questions aimed at identifying potential signs of problem gambling. These tools help the Player to make informed decisions about your gambling.

3.2 One commonly used test is available from Gamblers Anonymous – it is a 20-question quiz that is published on its website. <https://gamblersanonymous.org/20-questions/>

3.3 The CAGE Questionnaire (Adapted for Gambling)

The Player is encouraged to answer the following questions honestly:

1. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
2. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
3. **G – Guilty:** Have you ever felt guilty about your gambling?
4. **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

If the Player recognizes problematic gambling behavior through self-assessment tools, he/she is encouraged to use responsible gaming tools (such as a cooling period and self-exclusion)

4. TRAINING

4.1 Platinum Technology N.V. provides comprehensive training to all individuals who work with the Website to maintain high standards of responsible gambling.

4.2 **Employees** who interact directly with customers (such as support staff, VIP managers, and responsible gambling specialists) receive specialized training to recognize signs of gambling addiction, respond to self-exclusion requests, and

effectively communicate with at-risk players. Additionally, they undergo annual refresher courses to stay updated on new policies and best practices.

4.3 Marketing partners and affiliates must also complete responsible gambling training before promoting Platinum Technology N.V.'s products. They are required to adhere to strict guidelines that prohibit targeting minors or vulnerable groups and prevent the use of irresponsible marketing messages.

4.4. Social media influencers who collaborate with Platinum Technology N.V. receive guidance on responsible gambling principles and must not promote gambling to underage or vulnerable audiences. All influencer content must include warnings about responsible gambling and avoid creating a misleading or overly enticing image of gambling. If an influencer fails to meet these standards, Platinum Technology N.V. reserves the right to terminate the partnership.

5. COOLING-OFF

5.1 Platinum Technology N.V. offers the Player an option to initiate a 24-hour, 7-day, 1-month, or 3-month Cooling-off period, during which he/she will be unable to gamble on the Website.

5.1.1 Cooling-off must be available directly via the Player account without requiring manual intervention and is applied immediately upon selection.

5.2 Cooling-off may be selected by the Player by any combination of one, more, or all of the product verticals offered by Platinum Technology N.V.

5.3 The key difference between Cooling-off and Self-exclusion shall be as follows:

Cooling-off:

- Purpose: Short-term break from gambling.
- Duration: 24 hours, 7 days, 1 month, or 3 months.
- Effect: Player cannot participate in selected games during the selected period.

Self-exclusion:

- Purpose: Long-term exclusion to regain control over gambling behavior.
- Duration: Minimum 1 year, with options for 3, 5, 10 years, or lifetime exclusion.
- Effect: Player cannot participate in any gambling activities on the Website.

6. SELF-EXCLUSION

6.1 The Player has the right to self-exclude himself from gaming at any time by technical adjustments on our platform.

6.1.1 Self-exclusion must always be available via the Player account without reliance on support intervention.

6.1.2 Where technical adjustments are temporarily unavailable, the player can submit a request by sending an email to support email address as published on the Website.

6.2 Player may choose to self-exclude for 1 year, 3 years, 5 years, 10 years periods, or permanent exclusion. Once a self-exclusion request is submitted, it will take effect immediately. The player will no longer be able to access their account or participate in any gambling activities for the duration of the selected exclusion period.

6.2.1 Self-exclusion applies across all brands operated by the Company.

6.3 A self-exclusion request cannot be revoked or reversed by the player before the exclusion period expires. During the exclusion period, the player will not be permitted to reopen their account or create a new account.

6.3.1 The Company implements measures to prevent the creation of new accounts during the self-exclusion period.

6.4 Once self-exclusion is in effect:

1. The player's account will be locked for the duration of the exclusion period.
2. All marketing communications from Platinum Technology N.V. will be suspended. We will remove your data from all marketing and promotional lists during your self-exclusion period.
3. The player will not be able to deposit, place bets, or engage in any gambling-related activities.

6.5 After the self-exclusion period expires (except for lifetime exclusion), players may request to reopen their account by contacting our support email address as published on the Website. This request will be subject to an additional review process to ensure responsible gaming practices.

6.5.1 Reactivation must be initiated by the Player only and cannot be prompted by marketing communication.

7. LIMITS

7.1 Players can set deposit limits to control the amount they deposit over a specific period.

7.1.1 Deposit limits must be available directly within the Player account without requiring support interaction. Deposit limits are applied automatically by the system and enforced in real time.

7.1.2 Where available, Players may also set additional limits such as loss limits, wagering limits, or session duration limits.

7.2 Once a deposit limit is reached, the player will not be able to deposit additional funds until the limit resets. Reducing a deposit limit takes effect immediately.

7.3 Increasing a deposit limit is subject to a minimum 24-hour delay (replacing 7 days to meet CGA requirement).

7.4 The Company does not provide credit to Players for gambling purposes.

8. BEHAVIOR TRACKING

8.1 Behavior tracking is an essential component of our responsible gaming strategy. We track and analyze the following data points to identify problematic gambling behaviors:

Deposit and wagering frequency

Sudden increases or irregular patterns in deposits, wagering, or gaming sessions, which may signal compulsive gambling.

Use of multiple payment methods

Attempts to use different payment methods, especially when these are employed to bypass established limits.

Withdrawal reversals

Players who repeatedly cancel or reverse withdrawal requests, which may suggest an attempt to recover losses or a lack of control.

Extended play sessions

Prolonged gaming sessions without taking breaks, potentially indicating a compulsive or addictive behavior.

Increased communication with customer support

Players who frequently contact customer support for bonus requests, financial issues, or display signs of agitation or distress.

Frequent adjustments to responsible gaming tools

Players who consistently alter their deposit or loss limits or frequently use features like cooling-off periods and self-exclusions.

Young players with high spending

Players under 25 who engage in significant spending, especially on casino or virtual games, warrant closer scrutiny.

Maxing out credit cards

Players who reach their credit card limits and attempt to register additional cards for further deposits.

Unrealistic spending patterns

Spending behavior that significantly deviates from the player's demographic profile or known financial situation.

Opening multiple accounts

Attempts to create multiple accounts in order to bypass deposit or loss limits and continue gambling without restrictions.

8.2 If any of the above indicators of problematic gambling behavior are identified, appropriate measures will be taken, including:

1. Inform the Player about responsible gaming tools, including deposit limits, time-outs, and self-exclusion.

2. Applying deposit limits to the Player's account or restricting account activity if needed.
3. Direct the Player to external gambling support organizations.

8.2.1 All cases are recorded and managed through a structured risk-based escalation framework within the Player Account Management system. This includes automated and manual monitoring tools, internal flagging of high-risk behaviour, and escalation to trained personnel for review and intervention where appropriate.

9. REALITY CHECK

9.1 Platinum Technology N.V. implements Reality Check measures, which include, but are not limited to:

- A real-time session timer that is always visible while the Player is logged in.
- **Player-Activated Reality Checks** ("Customized Reality Checks"). Players can set customized alerts that trigger at specific time intervals. When activated, players must confirm that they have read the message before continuing play, with the option to either end the session or continue playing.

9.2 Customized Reality Checks temporarily pause the gameplay, requiring the Player to confirm they have read the message before resuming.

The custom messages include:

- A clear indication of how long the player has been playing.
- A display of the player's winnings and losses during that time.

10. MARKETING AND ADVERTISING

10.1 Platinum Technology N.V. is committed to ensuring that all marketing, promotional, and advertising activities align with responsible gaming principles. Platinum Technology N.V. does not engage in direct marketing actions such as emails, messaging, bonuses, or incentives during an active cooling-off or self-exclusion period.

10.2 Platinum Technology N.V. ensures that its advertising is truthful, does not encourage excessive gambling, and does not target vulnerable individuals. All of Platinum Technology N.V.'s business partners, including affiliates, influencers (both

on social media and other platforms), VIP representatives, and marketers, are required to comply with the responsible gaming framework and follow all relevant advertising regulations.

10.3 Platinum Technology N.V. avoids engaging in misleading, excessive, or irresponsible advertising. To ensure this, Platinum Technology N.V. adheres to several key principles:

10.3.1 Advertising should never be excessive, deceptive, or aggressive in nature. Furthermore, marketing and promotions must not target or appeal to self-excluded players, individuals with gambling issues, minors, or those who are financially vulnerable.

10.3.2 Platinum Technology N.V. also prohibits any portrayal of gambling as a means to achieve financial success or resolve financial difficulties. In addition, marketing must not suggest that skill can influence the outcome of games that are entirely based on chance. Advertising must never present gambling as an escape from stress, depression, loneliness, or personal struggles.

10.3.3 Moreover, marketing content should not use cartoons, animations, or visuals that would appeal to children or minors. Platinum Technology N.V. avoids using social media influencers, celebrities, or entertainers who attract minors in their marketing efforts.

10.3.4 Additionally, marketing materials must not feature minors or depict them engaging with gambling content. Platinum Technology N.V. also prohibits any sexual or explicit content in its advertisements or communications. It is important that gambling is not linked to harmful behaviors like smoking, drug use, alcohol consumption, seduction, or an enhanced physical appearance.

10.3.5 All bonus offers and promotions are communicated clearly with transparent terms and conditions, Platinum Technology N.V. does not encourage excessive gambling through aggressive bonus promotions.

10.4 All advertising must include responsible gaming messaging (e.g., “Play Responsibly”).

11. OPERATOR-INITIATED EXCLUSION

11.1 The Company reserves the right to exclude Players where problem gambling behaviour or fraud is identified.

11.2 Such exclusions are documented, not based on winnings, and retained for a minimum of five (5) years.

12. RESPONSIBLE GAMING OFFICER

12.1 If you have a complaint relating to our Responsible Gaming Policy and your rights under this Policy, please contact our Responsible Gaming Officer via the contact details provided in the Responsible Gaming section of the Website.

12.2 The Responsible Gaming Officer is responsible for oversight, monitoring, and annual reporting of Responsible Gaming effectiveness.

13. PLAYER ACCOUNT TRANSPARENCY

13.1 Players have access to at least six (6) months of transaction and gaming history via their account.

14. WEBSITE FOOTER REQUIREMENTS

14.1 The Website footer includes license details, company information, 18+ warnings, and links to Responsible Gaming resources.

15. RECORD KEEPING

15.1 All Responsible Gaming actions and interactions are recorded and retained for a minimum of five (5) years.