

Introduction

Curacao CGB

BET&MARK is owned and operated by Trickless N.V, a company registered in Curacao with Company Number 160941 and with Registered Address at: Zuikertuintjeweg Z/N, Curacao.

Trickless N.V, is licensed and regulated by the Curacao Gaming Control Board (GCB) with Licence Number: OGL/2024/139/0125 issued on 16/10/2024. Trust Service and Represented by <https://igagroup.com>

Objective and scope of the policy

The purpose of this AML & KYC Policy or Policy on The Prevention of Laundering Proceeds of Crime and Financing of Terrorism and Know your Customer procedures is:

- To obtain information and develop employee awareness on the prevention of laundering proceeds of crime and financing of terrorism,
- To comply with the obligations regarding local regulations,
- To evaluate customers, transactions and services offered with a risk-based approach and to mitigate those risks.

This policy shall be composed of the following measures:

- Know your customer principle
- Monitoring and control activities
- Suspicious transaction reporting
- Training
- Internal audit

Bet&Mark guarantee

All Users of Bet&Mark Site ensure by accepting this Policy and our Terms & Conditions at least the following:

1. The User has completed the registration form truthfully and correctly.
2. The User is not an individual under 18 years old or other legal age of majority in User's jurisdiction.
3. The User is neither under legal supervision nor restricted in their business activities.
4. The User has registered personally and not on the behalf of someone else.
5. The User uses the account for personal use and has no commercial intentions.
6. The User has no knowledge about any bet result of the underlying bet before placing it.
7. The User does not have multiple accounts on Bet&Mark Site.
8. The User has read and accepted this Policy.
9. The User cannot sell, transfer, assign and/or acquire by any other means the accounts to/from other Users.

10. The User assures that they won't use their account to transfer funds amongst their accounts
11. The user shall comply with AML/CFT obligations as per the regulatory requirements of Curacao
12. The user is not sanctioned in any jurisdiction or is in possession of sanctioned funds

III. Know your customer (KYC) procedures

Both international and local regulations require Bet&Mark to implement effective internal procedures and mechanisms to prevent money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery and to take action in case of any form of suspicious activity from its Users. To this effect "Bet&Mark" is obliged to comply with the relevant rules and regulations for which are legally bound to obtain. The user shall provide all requested information within a timely manner.

Verification procedures

One of the international standards for preventing illegal activity is customer due diligence (KYC). According to KYC, Bet&Mark establishes its own verification procedures within the standards of anti-money laundering and "Know Your Customer" frameworks.

Bet&Mark identity verification procedure requires the User to provide Bet&Mark with reliable, independent source documents, data or information (e.g., national ID, international passport, high-quality photo or selfie, driving license, crypto-wallet address, ownership of Payment Methods like cards or e-wallets etc, utility bill).

Bet&Mark will take steps to confirm the authenticity of documents and information provided by the Users. All legal methods for double-checking identification information will be used and Bet&Mark reserves the right to request further information on certain Users in order to be compliant with rules and regulations of the jurisdiction.

Bet&Mark reserves the right to verify User's identity on an on-going basis, as per regulatory obligation. In addition, Bet&Mark reserves the right to request up-to-date information and documentation from the Users, even though they have passed identity verification in the past.

User's identification information will be collected, stored, shared and protected strictly in accordance with the Bet&Mark Privacy Policy and related regulations including the GENERAL DATA PROTECTION REGULATION IMPLEMENTATION ACT (Act dated May 16, 2018 containing rules for implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)).

Once the User's identity has been verified, Bet&Mark is able to remove itself from potential legal liability in a situation where its Services are used to conduct illegal activity.

Know your customer (KYC)

For a successful registration the User shall provide Bet&Mark with valid identification information under these Know Your Customer (KYC) procedures, also the User shall undergo KYC procedure after completing the registration of User's Account in, but not limited to, the following situations:

Step one – At registration, the User shall provide the following information: name and surname, date of birth, gender, country of residence, currency, email address and player account password.

Step two - In case of transactions for the sum equal to or exceeding 2000 euros or equivalent in currency, whether in one instalment or in transactions that are linked. Verification requires the user's to provide a scanned copy or high resolution photo containing their photographic identification document and also a proof of their current residence.

Step three - Depending on the result of the verifications performed as provided above Bet&Mark reserves its right to perform supplementary check, at any time, and to request information such as, but not limited to: Status of employment, proof of income, monthly expected activity, gross annual income, including also verification of the source of wealth and funds

During the User's KYC process, as above mentioned, an individual User provides at least the following identification information to the Company:

User's full name [first name, middle/second name(S) last name(s)];
Complete address of residence and location of customer (utility bill, bank reference);
Email address
Date of birth
Gender
Identification data (ID, Passport, Driving License)
Status of employment and income
Official document that provides the source of wealth.
Proof of Ownership for all Payment Methods used in the Site account

After receiving the identification information the Compliance officer of Bet&Mark entitled to perform KYC check should verify this information requesting the appropriate documents. Appropriate documents for verifying the identity of User include, but are not limited to, the following:

A high resolution scanned copy or photo of pages of a passport or any other national ID, indicating family name and name(s), date and place of birth, document number, issue and expiry dates, country of issue, User's and User's signature;

A clear and high resolution photo of the User or selfie.

The User can undergo KYC procedure via its player account, and may also be requested to provide additional information or documents by e-mail to Bet&Mark's CS department support@betandmark.com or to Bet&Mark's Compliance department to compliance@betandmark.com.

Kindly note that Bet&Mark reserves the right to request KYC at any point during the business relationship

In this case Bet&Mark shall contact the User by email or other means to obtain the information and documents needed, namely, either utility bill not older than 3 months confirming the User's actual address or bank reference of the User not older than 3 months, or a high-resolution scanned copy or a photo of valid driving license with clear and high-resolution photo of the User.

The User acknowledges that he has to complete the noted KYC check for the withdrawal of funds or deposit in the noted cases, which must be in form and substance satisfactory to the Issuer.

The User is obliged to collaborate with regard to the AML/ KYC check and to provide any information and documents deemed necessary by Bet&Mark.

The User guarantees at all times not to be a resident or citizen of countries including, but not limited to the United States and its dependencies and territories, Aruba, Australia, Bonaire, Curacao, France, Iran, Iraq, Netherlands, Saba, Spain, St Maarten, Statia, U.S.A or the U.S.A dependencies, United Kingdom. ("Prohibited countries").

Users from the following countries are not eligible to use the Site and play its games. Bet&Mark will make all reasonable efforts to prevent players from these countries from reaching the games. We cannot guarantee successful processing of withdrawals or refunds in the event that User breaches this Restricted Countries policy.

Bet&Mark may reject any User in its sole discretion without being obliged to disclose any reason for the rejection.

In case the automatic procedures fail, Bet&Mark shall contact the User by email or other means to obtain the information and documents needed. In case the User does not provide within 30 days the documents in the requested form and any other information requested to satisfy the AML/KYC check, Bet&Mark may deny the User's withdrawal "close" the account or "freeze" the account of the User for playing (in case of KYC check during depositing) until such document or information is provided, as the case may be.

Bet&Mark does not offer services to Players who are identified as Politically Exposed Persons (PEP). Should You be identified as a PEP at any stage, Your Account will be closed and any remaining real money balance will be returned (subject to general regulatory obligations). If You disagree with Our determination of Your PEP status, please contact Us.

Compliance officer

The Compliance Officer is the person or a company, duly authorized by Bet&Mark, whose duty is to ensure the effective implementation and enforcement of the AML/KYC Policy. It is the Compliance Officer's responsibility to supervise all aspects of Bet&Mark anti-money laundering and counter-terrorist financing, including but not limited to:

Collecting Users' identification information.

Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations.

Monitoring transactions and investigating any significant deviations from normal activity.

implementing a records management system for appropriate storage and retrieval of documents, files, forms and logs.

Updating risk assessment regularly.

Providing law enforcement with information as required under the applicable laws and regulations.

The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

Bet&Mark has inhouse designated persons to carry out KYC checks and comply with legislative rules and standards of such procedure.

Bet&Mark guarantees that all personal data of the clients received during KYC check of such clients are kept safely and securely and can be processed only in compliance with rules of the GENERAL DATA PROTECTION REGULATION IMPLEMENTATION ACT and Privacy Policy of Bet&Mark.

VII. Anti-money laundering policy

Bet&Mark enforces a strict anti-money laundering policy with zero tolerance to money laundering activities.

We define Money Laundering as:

- The conversion or transfer of property, especially money, knowing that such property is derived from criminal activity or from taking part in such activity, for the purpose of concealing or disguising the illegal origin of the property or of helping any person who is involved in the commission of such an activity to evade the legal consequences of that person's or companies action;
- The concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from an act of participation in such an activity;
- The acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from assisting in such an activity;
- Participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the actions referred to in points before.

Money laundering shall be regarded as such even when the activities which generated the property to be laundered were carried out in the territory of another Member State or in that of a third country.

All Bet&Mark affiliates are obligated to comply with this anti-money laundering policy and internal AML Manuals and with all applicable anti-money laundering laws. Failure to comply can result in severe consequences such as criminal penalties and heavy fines.

Bet&Mark ensures complete compliance with laws pertaining to anti-money laundering through its related policy.

Bet&Mark implements a range of filtration operations for swift and accurate identification of any financial activities that may constitute or are related to money laundering. This helps ensure money laundering-free financial operations throughout the Bet&Mark Site.

All Users acknowledge, undertake and agree to the following terms regarding their use of Bet&Mark Site and games available on it, opening and maintenance of User Account at Bet&Mark and for all financial transactions as a Bet&Mark client:

The User will comply (while being a Bet&Mark client) with all relevant statutes pertaining to money laundering and proceeds from criminal activities.

Bet&Mark operates under certain obligations known as “know-your-client” obligations which grant Bet&Mark the right to implement anti-money laundering procedures to help detect and prevent money laundering activities where money laundering may mean to handle any funds associated with any illegal activity regardless of the location of such activity.

The User agrees to fully cooperate with Bet&Mark with respect to anti-money laundering efforts. This involves providing information that Bet&Mark requests regarding the client’s business details, account usage, financial transactions etc. to help Bet&Mark perform its duties as dictated by Applicable laws regardless of jurisdiction.

Bet&Mark reserves the right to delay or stop any funds transfer if there is reason to believe that completing such a transaction may result in the violation of any applicable law or is contrary to acceptable practices.

Bet&Mark reserves the right to suspend or cancel any account or freeze the funds at the account if there is reason to believe that the account is being used for activities that are deemed unlawful or fraudulent.

Bet&Mark has the right to use client information for the investigation and/or prevention of fraudulent or otherwise illegal activities.

Bet&Mark has the right to share client information with:

Investigative agencies or any authorised officers who are helping Bet&Mark to comply with applicable law, including anti-money laundering laws and know-your-client obligations on the basis of the Non-disclosure agreement concluded between Bet&Mark and such agencies or officers;

Organisations that help Bet&Mark to provide the services that it offers to its clients on the basis of the Non-disclosure agreement concluded between Bet&Mark and such organisations;

Government, law enforcement agencies and courts;

Regulatory bodies and financial institutions.

Activities that Bet&Mark considers possible indications of money laundering include:

The client showed unusual apprehension or reservations about Bet&Mark's anti-money laundering policies.

The client's interest in conducting financial transactions which are contrary to good business sense or are inconsistent with the client's business policy.

The client failed to provide the proof of legitimate sources for their funds.

The client provides false information regarding the source of their funds.

The client has a history of being the subject of news that is indicative of civil or criminal violations.

The client seems to be acting as a 'front man' for an unrevealed person or business, and does not satisfactorily respond to requests for identifying this person or business.

The client is not able to easily describe the nature of their industry.

The client frequently makes large deposits;

The client maintains multiple accounts and conducts an unusually high number of inter-account or 3rd party transactions.

The client's previously usually inactive account starts receiving a surge of wire activity.

The above list is by no means an exhaustive list. Bet&Mark monitors its client and account activity in light of several other red flags and takes appropriate measures to prevent money laundering.

Bet&Mark or partners on behalf of Bet&Mark (third party providers) check all users during KYC process against Pep's, sanctions list and adverse media.

VIII. Terrorist financing

Terrorists need funds to plan and carry out activities. Such threats are not taken lightly by the company due to the possibility of loss of life, as well as the utilisation of the company's services for illicit gains, which the company is against.

Part II of the Criminal code of Cyprus deals with offences against Public Order, and deals with terrorism amongst a number of other issues. In general, terrorist activity includes but may not be limited to:

- The provision or collection of funds;
- From legitimate or illegitimate sources;
- With the intention or in the knowledge;

- That they should be used in order to carry out any act of terrorism;
- Whether or not those funds are in fact used for that purpose.

Principal terrorism offences include:

- Fundraising;
- Use or possession;
- Arrangements;
- Money laundering;
- Failure to disclose offences;
- Tipping-off offences.

All FT offences carry heavy criminal penalties. FT is a very serious threat to the business, and must be taken as seriously as ML. While the FT and ML regimes differ, they share similar aims and structures. The main difference between ML and FT is that the source of funding for terrorist activity is generally lawful and, unlike ML, a relatively small amount of money is required to fund the attacks, which makes it easier for criminals to bypass the legitimate financial system. Many techniques used to disguise the destination of terrorist funds are identical to those used to disguise the source of illicit funds. Transactions are to be monitored to identify any links with terrorist or criminal activity.

Internal audit

The Compliance Officer is responsible to audit periodically on a risk sensitive basis whether the activities of Bet&Mark related to anti-money laundering law and regulations thereunder are conducted in compliance with the aforementioned legislation and policies and procedures of Bet&Mark.

The Compliance Officer reports directly to the Managing Director with regard to results of such checks and audits.