

# VERSUS ODDS B.V.

## Responsible Gaming Policy

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# 1. Introduction

At Versus Odds B.V. we support Responsible gaming by providing users a range easy to use and find self-service Responsible Gaming tools, maintaining a comprehensive Responsible Gaming page with valuable resources, and actively reviewing accounts that may raise concerns to ensure player safety and well-being and in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the requirements of the Curaçao Gaming Authority (CGA).

## 2. Player Responsible Gaming Tools

We offer tools to help players manage their gambling effectively

### 2.1 Deposit Limits

Players can set an amount they can deposit on a daily, weekly or monthly basis.

### 2.2 Reality Checks

Players get pop ups of how long they have time they spent online.

## 3. Adjusting Limits

- **Setting New Limits or Decreasing Limits:** Changes take effect immediately.
- **Increasing or Removing Limits:** A 24-hour cooling-off period applies.

Limits can be adjusted anytime in the “**LIMITS/RG**” section of the account or by contacting our support team

## 4. Self-Exclusion Options

To assist those who need a break from gambling, we provide several self-exclusion options:

### 4.1 Time-Out Period & Self Exclusion

- Players can choose a specific time-out period ranging from 24 hours, 7 days, 30 days or 90 days via the LIMITS/RG section or by contacting our support team.
- Players can choose a specific Self Exclusion period of 1 year or Permanent by contacting the Customer Support Team if assistance is needed or longer periods.
- A Permanent Self-Exclusion cannot be revoked.
- A Self-Exclusion applies across all current and future brands owned by [ENTITY NAME]
- Registered Payment methods are blocked to prevent future use for Self-Excluded players regardless of the amount of time of their Self-exclusion, including Permanent Self-Exclusion.

## 4.2 Account Status During Time-Out Period & Self-Exclusion

- The player's account balance remains intact, and withdrawals can be requested through support during a Time-Out Period.
- Self-Excluded accounts with real money balance or/and any pending withdrawals will be processed and paid within 2 working days, standard KYC and AML procedures may apply.
- No marketing communications will be sent during this period.
- Players are sent an email informing them of their Self Exclusion suggesting they should Self-Exclude with other Operators and provided with Help Organization Links.

## 4.3 Reopening Accounts

Players can reactivate their account after a self-exclusion period has elapsed, by contacting customer support via email. The account becomes active after observing a 7 day cool off period.

Accounts are only reopened after passing a Personal Gambling Severity Index (PSGI) test.

## 4.4 Compliance with Exclusion

Creating new accounts to bypass self-exclusion is prohibited. Such accounts will be closed, and losses incurred will remain the players responsibility.

## 4.5 Player Information Accessibility

Players can obtain information about our Responsible Gaming Feature and Self Exclusion on our website via:

- The Responsible Gaming Page
- Responsible Gaming Interaction Email
- Self-Exclusion Policy on the Home Page
- Under the Responsible Gaming of our Terms & Conditions
- "Gambling can be Harmful" Message including "Underage Gambling is prohibited" with a link to Responsible Gaming Page in footer
- Dynamic Seal
- 18+ Logo
- Help Organizations Logos with external links
- License Entity Name, Address and CGA License number in Footer

## 5. Advertising & Marketing

All advertising will include messages promoting responsible gambling, such as:

- *“Gambling can be addictive, please Play Responsibly. For help visit our Responsible Gambling page. Underage gambling is an offense”*
- Tools such as betting limits will be highlighted in promotional materials from time to time

### 5.1 Marketing Opt-Out for Responsible Gambling Measures

- **Time Out:** Players who have opted for a *Time Out* (temporary suspension of player account) will be automatically removed from all marketing and promotional communications for the duration of their Time Out.
- **Self-Exclusion:** Players observing a *Self-Exclusion* will also be automatically removed from all marketing and promotional communications for the duration of their Self-Exclusion period.
- **Permanent Self-Exclusion:** Players observing a *Permanent Self-Exclusion* will have their details permanently removed from the marketing database to ensure no further communication.

### 5.2 Email Communication Standards

All email communications sent by Versus Odds B.V. must adhere to the following requirements:

- **Company Footer:** Every email must include a footer that contains:
  - A Responsible Gaming Disclaimer
  - A Curaçao Gaming Authority Dynamic Seal
  - Company Details
  - Help Organization Logos
  - 18+ Logo
  - The terms and conditions (*T&Cs*) for any offer mentioned in the email.
  - An unsubscribe option allowing recipients to opt out of future communications easily.
- **Accuracy:** All email content must align with this Advertising Policy, providing accurate and non-misleading information.
- **Consent:** Emails must only be sent to individuals who have explicitly opted in to receive marketing communications.

## 6. Account Review

We use the following analysis to determine their involvement in gaming to help determine the gameplay indicators, behavioural indicators & determine the risk level.

- Transactional - Payment methods:
  - Determine if it is Debit or Credit.
  - Number of payment methods used.
- Deposits/ Withdrawals
  - Net losses/ profit over the number of active months.
  - Deposits following withdrawals.
  - Failed deposits: declined/ no funds/ no system error related.
  - Cancelled withdrawals.
  - Deposits per session.
- Game Play & Gameplay patterns:
  - Stakes
  - Session's activity
  - Prolonged gaming by game rounds
  - Types of games
  - Deposit patterns
- RG Tools Usage
  - Limit Changes
  - Session limits
  - Take a break.
  - Self- exclusion
- Behavioural - Communications:
  - Live chats transcripts
  - Emails

## 7. Responsible Gaming Training

- All new employees must complete a series of online modules on our iGaming Academy.
- Employees that hold a player facing role with get extensive quarterly in-house Responsible Gaming training conducted by the Head of Responsible Gaming or Responsible Gaming Specialist.
- Annual Responsible Gaming training is given to employees with player facing roles along with management by an outsourced training partners which specialize in Safer Gambling and courses.

## 8. Right to Intervene

We reserve the right to block or close accounts and return real balances if continued use of our services is deemed harmful to a player's well-being.

## 9. Underage Gambling

- Gambling is prohibited for individuals under 18.
- Players will be requested to enter their Date of Birth upon registration and declare that they are of legal age, over 18 years old.
- Full KYC is requested if any accounts are suspected to be registered by a minor.
- Any underage activity is maintained on records and their outcomes. These records must be kept indefinitely and readily available for regulatory review.
- Accounts created by underage users will be closed immediately and will be blacklisted to prevent creation of future accounts and payment method used will be blocked.
- Deposits will be refunded within 24 hours to the original payment method when possible after identifying the incident. The deposits will remain on the account until refunded.
- Any winnings will be forfeited.

## 10. Self-Exclusion Register

All Self-Excluded player details are logged on the register which is kept indefinitely and includes:

- Player Name
- Username
- Email Address
- Phone Number
- From & Expiry Date
- Channel – Front End or Via other means

## 11. Support for Problem Gambling

We are committed to helping those struggling with gambling addiction. Professional resources on our Responsible Gaming Page include:

- Gamblers Anonymous
- GamCare
- Quit Gamble
- Target Market Local Organizations

## 12. Additional Tips for Responsible Gambling

To further support responsible gambling, we recommend the following measures to players via our Responsible Gaming Page and Email Communications:

### 12.1 Device Blockers

Consider using device-blocking software to limit access to gambling websites. Popular options include:

- Gamblock
- Betblocker

### 12.2 Self-Assessment - Take the Test

The GamCare Self-Assessment Test is available for players via our Responsible Gaming Page and Email Communications

- The test includes a series of statements to evaluate, where you score each statement on a scale of 1-10 based on how much it applies to the user.
- The results will provide a detailed breakdown of how gambling may be impacting the user's life and offer personalized recommendations for the next steps.

## 13. Signatory Page

Signed by:  
  
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Mary Flor Cauchi  
Responsible Gaming Officer  
Versus Odds B.V.