

Versus Odds B.V.

Know Your Customer (KYC) Policy

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1. Purpose and scope

This Know Your Customer (KYC) Policy outlines the procedures that Versus Odds B.V. (hereafter referred to as "the Company" or "Versus Odds") has implemented to ensure compliance with applicable regulations and to prevent fraud, money laundering, and terrorist financing in accordance with CGA regulations. The policy is designed to comply with the guidelines set forth by the Curaçao Gaming Authority (CGA) and other relevant regulatory bodies.

The purpose of this KYC policy is to:

- Establish and verify the identity of our customers.
- Detect and report suspicious activities in line with the CGA's reporting requirements.
- Prevent the use of the Company's platform for illegal purposes, including money laundering and terrorist financing.
- Ensure compliance with local and international laws, including those mandated by the CGA.
- Promote transparency and integrity within the online gaming industry.

This policy applies to all customers, employees, agents, and third-party service providers involved in the operations of Versus Odds. The policy covers all aspects of the customer relationship, from account opening to ongoing monitoring and eventual closure of accounts, in compliance with the CGA regulations.

2. Audience

This KYC Policy applies to all employees, officers, directors, contractors, consultants, and any other individuals or entities acting on behalf of the Company, regardless of location or job function.

It is particularly relevant for individuals engaged in the following activities:

- Customer onboarding and due diligence;
- Financial transactions and payment processing;
- Compliance and risk management; and
- Legal and regulatory affairs Internal audit and controls.

All personnel must understand their responsibilities under this policy and complete any required training provided by the Company. Failure to comply with the obligations outlined in this policy may result in disciplinary action, up to and including termination of employment or contract.

Third-party partners, agents, and service providers who represent or act on behalf of Versus Odds B.V. may also be required to comply with this policy, as determined by the nature of their relationship with the company.



3. KYC Procedures

- **Identity Verification:** Customers are required to provide a valid government-issued identification document, such as a passport, national ID card, or driver's license. The document must include the customer's full name, date of birth, photograph, and nationality. Verification must comply with the CGA's requirements for authenticity checks.
- **Address Verification:** Customers must provide proof of residential address, such as a recent utility bill, bank statement, or rental agreement, issued within the last six (6) months. Enhanced verification methods as required by the CGA are employed.
- **Age Verification:** Customers must be at least 18 years old to participate in online gaming activities. Age verification is conducted through the provided identification documents and supplemented by digital verification tools approved by the CGA.

4. KYC Requests

Verification of identity is requested when engaging in financial transactions equal to or in excess of NAF 4,000 (€2,000). This implies that all CDD measures must have been conducted at the time the threshold is reached.

Customer accounts are flagged until documents received and authenticated. No withdrawals are processed from a customer's account until the KYC verification is completed.

5. KYC Documents

To fulfil the Company's KYC obligations, the customer must submit a valid ID and POA document dated within the previous six (6) months.

5.1 What documents the Company accept as a Proof of Identity?

- current signed passport
- current photo card driving licence
- national ID card
- government-issued ID document with photo

The Company only list these, as authenticity of some documents may be easier to assess/forged than that of others. For example, government-issued identification documents such as identity cards and passports can be checked against standard official templates.

5.2 What documents the Company accept as a Proof of Address?

- council tax bill
- utility bill (e.g.: water, heat, fixed line telephone, fixed line internet etc)
 - (not a mobile bill as it is not tied to an address. A utility is).
- bank statement
- insurance certificate

- correspondence from government authority, department or agency

The Company only list these, as authenticity of some documents may be easier to assess/forged than that of others.

5.3 The Company has received the documents. What next? What is the minimum quality standard?

5.3.1 *The minimum quality standard for Proof of Identity*

- face match (where applicable),
- must show full name (be careful with derivations, update as necessary),
- date of birth,
- photo,
- all 4 corners have to be visible,
- coloured (not black & white),
- both pages (eg: of passport in the UK - so we can see the signature),
- in date,
- signed,
- clearly legible,
- in a language that is understood by us,
- has to be a picture of the original document, no scans.
- screenshots or pictures of screens can be accepted.

5.3.2 *The minimum quality standard for Proof of Address*

- must show full name (be careful with derivations),
- address,
- be no more than 3 months old,
- with account/reference/utility number,
- clearly legible,
- in a language that is understood by us,
- has to be a picture of the original document, no scans,
- screenshots or pictures of screens can be accepted. (alternatively, the PDF received by the player is acceptable).

5.4 What if players don't have the standard documents?

There are many other documents that can be sent in. Versus Odds only say these ones, as they are the most reliable and least risky. However sometimes, players may genuinely not be able to send in the standard documents. If players insist that they do not have the documents the Company have listed, please contact the KYC team.

Please note this should be a rare occurrence as alternative documents open the Company up to more risk. These cases will be dealt with on a case-by-case basis in a risk-based manner. It is not a guarantee that the Company will accept the player's alternative document.

Acceptable forms of ID if player has no standard ID document:

- birth certificate + selfie
- firearms certificate or shotgun licence

6. Document capture and verification

The Company partners with a 3rd party Identification Verification provider to assist in the capture and verification of documents provided by its customers.

Included in the automated KYC email request the company sends links for its customers to upload or take pictures of the required documentation.

7. Document authentication

On receipt of the required documentation, the company deploys a team of KYC agents who are responsible for matching the customer details against those submitted at registration and authenticating the documents supplied.

Where documents are verified, the customer is emailed to confirm, and customer accounts are flagged as verified.

Where documents are incomplete, KYC agents will follow up with customer.

Where documents are found to be falsified or player identified as underage, account(s) are immediately restricted, and details escalated to the Senior Management.

8. Ongoing monitoring of identity

In conducting ongoing due diligence on the business relationship, Versus Odds always thrive to hold accurate and up to date identification data of its customers. Since identity may change due to circumstances (e.g. marriage, divorce), Versus Odds is able to demonstrate that if identification information changes, it will be detected and re-verified.

Versus Odds considers obtaining evidence of identity and periodically to detect any changes, refresh the data on key events (i.e. change of payment method, 3rd party payment method usage) or should consider tracking expiry dates on evidence of identity and refreshing it when expiring.

The Company determines on a risk-sensitive basis whether changes are substantial as to require re-assessment of customer risk of the business relationship.

As with anything else, the level of on-going monitoring will depend on the risk profile of the customer, but even in low-risk situations there is a degree of oversight taking place to ensure that the business relationship still has to be considered as a low risk one.



9. Failure to comply

Where the customer fails to submit documents within thirty (30) days of the initial request the KYC agents are alerted. In those cases, the account will be disabled (meaning the deposit, gameplay and withdraw options switched off) – business relationship terminated.

10. Penalties for non-compliance

Internal disciplinary actions: Employees or third parties found to be non-compliant with the Company's KYC policy may face disciplinary actions, including termination of employment or contracts.

Regulatory penalties: The Company acknowledges that non-compliance with KYC regulations can lead to significant fines, sanctions, or the revocation of its gaming license by the Curaçao Gaming Authority.

11. Conclusion

The Company is committed to maintain the highest standards of compliance with KYC regulations to protect itself, its customers, and the broader financial system. By adhering to this policy, the Company aims to foster a safe and transparent gaming environment, in strict accordance with the CGA's regulations.

12. Record keeping

All records obtained through CDD measures (e.g. copies or records of official identification documents like passports, identity cards, driving licenses or similar documents), account files and business correspondence kept for at least five years after the business relationship is ended, or after the date of the occasional transaction.

The CDD information and is available to competent authorities based upon appropriate legal authority.



13. Reference to Customer Acceptance Policy (CAP)

Please see the Company’s AML Policy document for a separate Customer Acceptance Policy under Annex IV – Client Acceptance Policy (page 51).

14. Appendix

List of abbreviations and terms

CGA	Curaçao Gaming Authority
DOB	Date of Birth
ID	Identification
KYC	Know Your Customer
POA	Proof of Address

Signatory Page



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