

Versus Odds B.V

IT Security Policy

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Document Version Control

Version	Date	Author	Purpose
1.0	30-10-2025	Versus Odds B.V	Creation of IT Security Policy

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1. Purpose and scope

The purpose of this IT Security Policy is to protect Versus Odds B.V's or "The Company" information systems, ensure the confidentiality and security of customer data, and maintain compliance with the requirements set forth by the Curacao Gaming Authority. This policy applies to all employees, contractors, and third-party suppliers who access or manage the Company's information technology resources.

2. Security principles and objectives

Versus Odds B.V is committed to:

- **Confidentiality:** Protecting customer data and proprietary information from unauthorized access.
- **Integrity:** Ensuring data accuracy and consistency across all platforms and systems.
- **Availability:** Providing reliable access to IT systems and data for authorized users.
- **Compliance:** Adhering to Curacao Gaming Authority regulations, industry best practices, and international standards (e.g., GDPR, ISO 27001).

3. Access control

3.1 User access management

- **Role-Based Access Control (RBAC):** Access to systems and data is based on employees' job roles and responsibilities. Privileged access is restricted to necessary personnel only.
- **Authentication:** Multi-factor authentication (MFA) is required for accessing critical systems, with strong password policies enforced across all accounts.
- **User access reviews:** Access rights are reviewed annually to ensure permissions are current and align with employees' roles.

3.2 Privileged access control

- **Administrator controls:** System administrators and privileged users have additional security checks, including activity monitoring and strict authentication measures.
- **Least privilege principle:** Access is limited to the minimum permissions necessary to perform job functions, reducing the risk of unauthorized data exposure or manipulation.

4. Data protection and privacy

4.1 Data classification and handling

- **Data classification:** All data is classified according to sensitivity (e.g., public, internal, confidential, and restricted). This classification dictates the data's storage, handling, and access requirements.
- **Encryption:** All sensitive and restricted data, including customer data and financial records, is encrypted at rest and in transit using strong encryption protocols.
- **Data masking:** Sensitive customer information is masked when displayed in internal systems to prevent unauthorized access.

4.2 Personal data protection

- **GDPR compliance:** Personal data is handled in accordance with GDPR standards, with customer consent obtained before data collection and strict limitations on data retention.
- **Data minimization:** Only necessary personal data is collected and only if it is needed, and data that is no longer needed is securely deleted or anonymized in line with data retention policies.
- **Breach notification:** In the event of a data breach involving personal information, customers and regulatory bodies are notified as per GDPR and CGA requirements.
- **Data subject rights:**
Procedures are in place to ensure customers can exercise their rights under GDPR, including rights of access, rectification, erasure (“right to be forgotten”), restriction of processing, and data portability. Requests are verified and processed within statutory timeframes.
- **Data retention and disposal:**
Retention periods are defined based on legal and regulatory requirements (e.g., AML, KYC, and gaming regulations). Once retention periods expire, personal data is securely deleted or anonymized using approved destruction methods.
- **Data storage and encryption:**
All personal data, including customer records, payment information, and identification documents, is stored in encrypted form. Encryption is applied both in transit (TLS 1.2 or higher) and at rest (AES-256 standard or equivalent). Decryption keys are managed securely and separately from data.
- **Access control:**
Access to personal data is strictly limited to authorized personnel based on role and business need. Multi-factor authentication (MFA) and least-privilege principles are enforced. All access and data manipulation activities are logged and monitored.
- **Data transfers:**
Any transfer of personal data outside the EU/EEA is carried out in accordance with GDPR Chapter V, using approved safeguards such as Standard Contractual Clauses (SCCs) or adequacy decisions. Third-party service providers are vetted and bound by Data Processing Agreements (DPAs).
- **Third-party and vendor management:**
All third-party service providers with access to customer data must comply with GDPR and the casino’s information security standards. Regular reviews and audits are conducted to ensure ongoing compliance.
- **Employee confidentiality and training:**
All employees receive mandatory data protection and security awareness training at onboarding and annually thereafter. Employees handling customer data are bound by confidentiality agreements.
- **Data Protection Officer (DPO):**
A designated DPO oversees compliance with GDPR, conducts impact assessments (DPIAs), and serves as the main contact for data protection authorities and customer inquiries.
- **Privacy by design and by default:**
All systems, processes, and applications are designed with privacy considerations

built-in, ensuring that data protection is an integral part of new projects and product development.

5. Network security

5.1 Firewalls and intrusion detection

- **Firewall protection:** Network firewalls are configured to restrict access to company resources based on IP addresses and other parameters. Firewall rules are **reviewed at least quarterly** and after any significant system change to ensure continued protection and compliance with security and regulatory standards.
- **Intrusion Detection and Prevention Systems (IDPS):** IDPS continuously monitors network traffic to detect and block unauthorized or suspicious activity.
- **Network segmentation:**
Production, development, testing, and corporate networks are **logically and physically segmented** to minimize lateral movement risks and protect critical assets. Player data, payment systems, and administrative environments are isolated and accessible only through controlled and audited connections.

5.2 Secure remote access

- **VPN usage:** Remote access to company systems is restricted to Virtual Private Networks (VPNs) with strong encryption and MFA.
- **Access logging:** Remote access activity is logged and reviewed periodically for signs of unusual behaviour or security violations.

5.3 Network Monitoring and Hardening

- **Continuous monitoring:**
Network devices, servers, and endpoints are continuously monitored using **Security Information and Event Management (SIEM)** tools for real-time detection of anomalies, intrusions, and potential compromise indicators.
- **Patch management and configuration control:**
Routers, firewalls, and network devices are maintained at current vendor-supported firmware and patch levels. Configuration changes are documented, reviewed, and approved under the **Change Management Policy**.
- **DDoS protection:**
Distributed Denial-of-Service (DDoS) mitigation controls are deployed to safeguard online gaming platforms and services from disruption, using cloud-based or ISP-level traffic filtering mechanisms.

5.4 External Connectivity and Vendor Access

- **Third-party access:**
External service providers requiring network access (e.g., payment gateways, affiliate

systems, or managed service providers) must connect through **secure, monitored VPN tunnels**.

All third-party connections are approved, time-bound, and logged. Access is reviewed periodically for necessity and compliance.

- **Penetration testing:**

External and internal **network penetration tests** are conducted **annually** or after major changes to the network infrastructure. Findings are documented, prioritized, and remediated according to internal procedures.

6. System security

6.1 Patch management

- **Regular updates:** All software, hardware, and firmware are updated regularly to protect against known vulnerabilities. Critical patches are applied within 48 hours of release.
- **Patch testing:** New patches are tested in a controlled environment before being deployed to production systems to prevent compatibility issues.

6.2 Antivirus and Malware protection

- **Antivirus software:** Company-approved antivirus software is installed on all endpoint devices and servers, with real-time scanning and automatic updates enabled.
- **Malware scanning:** Regular malware scans are conducted on all systems, with any detected threats immediately isolated and removed.

7. Application security

7.1 Secure Software Development Lifecycle (SDLC)

- **Secure coding standards:** Developers follow secure coding practices, such as input validation, authentication, and session management, to minimize vulnerabilities.
- **Code reviews:** All code undergoes peer reviews to identify potential security issues before deployment.
- **Application testing:** Security testing, including penetration tests and vulnerability assessments, is conducted on new applications before they go live.

7.2 Third-party software and integrations

- **Supplier Security Assessment:** All third-party software and services are evaluated for security risks before integration, with priority given to CGA-compliant suppliers.
- **API security:** Secure API practices, such as encryption and access controls, are implemented to protect data shared with third-party systems.

8. Incident response and management

8.1 Incident Response Team (IRT)

- **Team composition:** An Incident Response Team, comprising IT, Compliance, and Legal representatives, is responsible for managing security incidents.
- **Incident triage:** All reported incidents are triaged by the IRT to determine their severity and impact on company operations and customer data.

8.2 Incident reporting and documentation

- **Internal reporting:** Employees are required to report any suspected security incidents immediately to the IT security team.
- **Documentation:** All incidents are documented, including the nature, resolution steps, and lessons learned, to improve future response efforts.

8.3 Communication with CGA

- **Regulatory notification:** Security incidents involving data breaches or system compromise are reported to the CGA as per regulatory guidelines.
- **Customer notification:** Affected customers are notified in compliance with CGA and data protection requirements, with transparent communication regarding incident details and mitigation steps.

9. Security awareness and training

- **Mandatory training:** All employees receive annual security training covering data protection, phishing awareness, password security, and incident reporting protocols.
- **Simulated phishing tests:** Regular phishing simulations help employees recognize and report suspicious emails, reducing the risk of social engineering attacks.
- **Compliance and policy updates:** Employees are informed of updates to security policies and regulatory requirements, ensuring ongoing awareness of best practices.

10. Compliance and audit

10.1 Internal audits

- **Regular audits:** Annual IT security audits are conducted to assess policy compliance, identify vulnerabilities, and verify controls are effectively implemented.
- **CGA compliance review:** The audit includes a review of CGA-specific requirements to ensure continued licensing compliance and adherence to gaming security standards.

10.2 Penalties for non-compliance

- **Disciplinary actions:** Employees found in violation of IT security policies may face disciplinary action, including warnings, suspension, or termination, depending on the severity of the violation.
- **Policy violations reporting:** All non-compliance incidents are documented, and, when necessary, reported to the CGA as per regulatory guidelines.

11. Policy review and updates

- **Policy revisions:** This IT Security Policy is reviewed annually by the IT Security and Compliance teams to ensure alignment with the latest CGA guidelines, industry standards, and emerging security threats.
- **Employee notification:** Major policy updates are communicated to all employees, with training provided on new procedures and security controls.
- **Feedback and continuous improvement:** Employees can provide feedback on the policy, which is considered in the review process to foster a practical and responsive security culture.

12. Business Continuity Plan

12.1 Objectives of Business Continuity Plan

- Maintain uninterrupted service to clients and partners.
- Minimize the impact of operational, technical, or security incidents.
- Protect and recover critical data, assets, and systems.
- Ensure compliance with regulatory, contractual, and data protection obligations (e.g., GDPR, ISO 27001, CGA requirements).

12.2 Incident Classification, Response and Continuity Procedures

12.2.1 Classification of Reported Faults

Priority 1: Critical Gameplay Impact

The Reported Fault results in a total or near-total failure of the Services, such as all or most games being unavailable, API failure, or severe errors affecting the core functionality of games. These issues have an immediate and significant impact on player experience and the brand revenue, and must be treated as urgent.

Examples:

- Aggregation API completely inaccessible
- All or major group of games unavailable
- Gameplay errors resulting in incorrect player balances
- Jackpot system failures (value not updating, won jackpot not recorded)
- Widespread crash or error across multiple games/studios
- Game returns invalid win/loss value

Priority 2: Significant Player or Revenue Impact

The Reported Fault affects one or more key functionalities or games, significantly degrading player experience or affecting a substantial portion of the player base. These issues are serious but do not constitute a complete outage.

Examples:

- Game or group of games unavailable for large group of players
- Bonus or feature not triggering in one or more popular games
- New game released but unavailable to players
- Player session timeout
- Game causing problems on the website' side (losing money)
- A VIP player is having problems with the games
- One of the games is not Available for all players
- A new issue blocking the gameplay was reported in the game, which blocks gameplay for multiple players
- A player won a high-stakes win and the Company should validate if the win is valid.

Priority 3: Low or Individual Impact

The Reported Fault impacts individual players, games, or non-core functionalities. These issues are minor, cosmetic, or administrative in nature and do not significantly affect player experience or system performance.

Examples:

- Player reports missing bonus spins or rewards
- A single game fails to launch for an individual player
- Game unavailable in one geo/market
- Game thumbnail, name, or category mismatch
- Whitelist/blacklist request for a specific game or studio
- Operational problems of individual players
- A player is blocked, and cannot play a game.
- A player cannot open a game.

12.2.2 Incidents SLAs

- **Priority 1 (Critical Gameplay Impact):** 2-hour resolution, hourly updates.
- **Priority 2 (Significant Impact):** 24-hour resolution, 4-hour updates.
- **Priority 3 (Low Impact):** 48-hour resolution, daily updates.

If resolution targets are not met, escalation to the Account Manager or Incident Manager occurs. Repeated SLA breaches trigger an Improvement Plan.

12.3 Communication Plan

During disruptions, the Customer Support team coordinates communications with players, with updates per SLA.

Post-incident reports are provided within 48 hours of resolution to brand management.

12.4 Improvement Plan

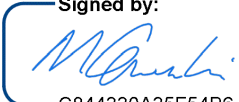
If the Company fails to meet the agreed service levels for two (2) consecutive months, it shall promptly develop and implement an Improvement Plan to restore performance to the agreed standards.

The Improvement Plan shall:

- Identify the root causes of the performance deficiencies;
- Define corrective actions and timelines to prevent recurrence;
- Assign responsibilities and establish clear performance metrics; and
- Include a report detailing findings and proposed improvements, to be submitted to the Licensee for review and approval prior to implementation.

If the Company fails to achieve the required service levels for three (3) consecutive months, despite the implementation of the Improvement Plan, the Licensee reserves the right to terminate the Agreement immediately by providing written notice to the Company.

13. Signatory page

Signed by:

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Compliance Officer
Versus Odds B.V