

Player Verification Policy

Using Brite Pay N Play

1. Purpose

The purpose of this policy is to outline the player verification procedures applied by the Company through the integration of **Brite Pay N Play**.

2. Scope

This policy applies to:

- All new player registrations.
- Each login session for existing players.
- All deposit and withdrawal transactions conducted on the platform.
- Continuous monitoring of player activity to prevent underage access, money laundering, terrorist financing, and other prohibited activities.

3. Definitions

- **BankID**: A regulated digital identity system provided by banks within the EU, used for strong customer authentication (SCA).
- **Brite Pay N Play**: A payment and verification service that facilitates instant deposits, withdrawals, and identity verification through the player's verified bank account.
- **SCA (Strong Customer Authentication)**: Two-factor authentication as required under the EU Payment Services Directive (PSD2).

4. Procedures

4.1 Account Creation

- Players initiate registration by selecting the "Play Now" / "Register" option.
- The player is redirected to the **Brite Pay N Play onboarding flow**.
- The player selects their bank from a list of supported EU/EEA banks.
- The player authenticates via **BankID**, which requires multi-factor authentication (e.g., Mobile ID, Smart ID, secure PIN).
- Verified information is retrieved directly from the player's bank, including:
 - Full legal name
 - Date of birth
 - Residential address
 - Bank account details (IBAN, BIC)
 - Country of residence Finland Y/N

4.2 Login and Ongoing Verification

- For each session, the player must authenticate via **BankID**.
- No operator-issued usernames or passwords are stored.
- Continuous verification ensures that only the verified account holder can access the gaming account.

4.3 Prevention of Underage Gambling

- **BankID is only issued to adults holding verified bank accounts.**
- This prevents access by individuals below the legal gambling age
- Attempts by underage individuals will fail automatically at the verification stage.

4.4 Deposits and Withdrawals

- Deposits: Processed instantly through the verified bank account.
- Withdrawals: Permitted only to the **same verified bank account** used for deposits.
- This ensures compliance with AML requirements and prevents third-party transactions.

4.5 AML and Responsible Gambling Safeguards

- All transactions are tied to verified bank accounts.
- **Source of Funds (SoF):** automatically confirmed through the player's bank.
- Real-time transaction monitoring is applied to detect suspicious activity.
- Session-based verification prevents account sharing and enables monitoring for responsible gambling indicators (e.g., excessive play, irregular betting patterns).

4.6 Data Integrity and Security

- Data is collected directly from banks and cannot be altered by the operator.
- All communications are encrypted using TLS protocols.

- The operator maintains **audit logs** for each verification, session, and transaction.

5. Compliance Statement

This player verification process ensures:

- **Compliance with all requirements** for player identification and prevention of underage access.
- **AML compliance**, including customer due diligence (CDD) and ongoing monitoring.
- **Operational integrity**, as only verified account holders can transact.
- **Audit readiness**, with complete records available for review

6. Conclusion

By utilizing **Brite Pay N Play** with mandatory **BankID authentication**, the Company ensures that:

- All players are verified at registration and at every login.
- Minors cannot access the gaming environment.
- Deposits and withdrawals are fully traceable and compliant with AML legislation.
- The system provides a safe, transparent, and regulatorily compliant environment for both players and authorities.
- Only users residing in Finland are able to create an account