

AML and KYC

Please read Our Anti-Money Laundering and Know Your Customer Policy (AML and KYC Policy) carefully before using Our Service.

Duelbits.com is operated by Liquid Entertainment N.V. (company number: 143298) and has its office registered at Zuikertuintjeweg z/n (Zuikertuin Tower), Willemstad, Curaçao, jurisdiction: Curacao. Email: support@duelbits.com.

Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or plural.

Definitions

For the purposes of this Policy:

- Account means a unique account created for You to access Our Service or parts of Our Service.
- Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Liquid Entertainment N.V..
- Country refers to: Curacao.
- Bet refers to all Your entries in the Roulette or Dice Duels on Our Website.
- Terms and Conditions (also referred to as "Terms") mean these Terms and Conditions that form the entire agreement between You and the Company regarding the use of the Service. These Terms include our TOS, Privacy Policy, AML-KYC Policy, Responsible Gambling Policy, Self-Exclusion Policy, and Minor Protection Policy.
- Website refers to duelbits.com, accessible from Liquid Entertainment N.V..
- You/User/Customer means the individual accessing or using Our Service, or the company, or other legal entity on behalf of which such individual is accessing or using Our Service, as applicable.
- ML refers to Money Laundering.
- AMLCO refers to Anti Money Laundering Compliance Officer, a member of the Management team especially charged to prevent money laundering.

For Cash Deposits and Cash Withdrawals

The objective of the AML Policy: We seek to offer the highest security to all of Our Users and Customers on Duelbits for that an Account verification is done to ensure the identity of Our Customers.

The reason behind this is to prove the details of the person registered are correct and the deposited values are not stolen or being used by someone else, which is to create the general framework for the fight against all kinds of Money Laundering. We also take into consideration that depending on the nationality and origin, the way of payment and for withdrawing different safety measurements must be taken.

Duelbits also puts reasonable measures in place to control, limit, and avoid Money Laundering risk, including dedicating the appropriate means. Liquid Entertainment N.V.'s goals are to ensure there is no Money Laundering done via their gambling Services.

Duelbits is committed to high standards of Anti-Money Laundering (AML) according to applicable guidelines and compliance and requires management & employees to enforce these standards in preventing the use of its Services for Money Laundering purposes. Liquid Entertainment N.V. also takes additional safety measures, especially when accepting any cryptocurrencies or objects of value.

The first step of verification is an electronic KYC (Know Your Customer) check, which must be done before any Withdrawal is possible. duelbits.com is not responsible for any delays in withdrawal created by the KYC checks.

After a user deposits funds to Duelbits using any depositing option provided by the company, except CS:Go Skins, there is a minimum percentage of the amount that must be wagered until a withdrawal for the said funds is requested; otherwise the company reserves the right to ask for any additional KYC documentation and freeze the user's funds until the KYC requirement is fulfilled.

If you have mistakenly deposited funds to your account that you do not wish to gamble, you are able to withdraw the funds back to the address that you deposited from. Please contact us via chat or email and we will be happy to help. (Not applicable for FIAT transactions)

If the funds are illegitimately gained, the company reserves the right to hold any User's funds including CS:GO Skins.

For certain investment amounts, further verification would need to be carried out.

Coin Mixing

Duelbits has a strict policy against coin mixing. This is in accordance with our anti-money laundering measures, which are described in our terms of service. If we believe deposits and withdrawals include efforts to coin mix, we have the right to freeze

withdrawals until one of the following steps is completed: The withdrawal is returned to the same address where the deposit was made. Withdrawals are sent upon the completion of account verification and KYC. Withdrawal has been refunded, and 1x gameplay was reached. Duelbits aims to resolve any issue, and the above can be modified on a case-by-case basis.

Customer identification and verification (KYC-AML 1)

- The formal identification of Customers on entry into commercial relations is a vital element, both for the regulations relating to money laundering and for the KYC policy, namely the verification of ID Card and proof of address.
- **AML & SANCTIONS COMPLIANCE.** The company expressly prohibits and rejects the use of the Service for any form of illicit activity, including money laundering, terrorist financing or trade sanctions violations, consistent with various jurisdictions' laws, regulations and norms. To that end, the Service is not offered to individuals or entities subject to United States, European Union, or other global sanctions or watch lists. By using the Service, you represent and warrant that you are not so subject.
- **JURISDICTIONS.** Persons located in or reside in United States, Syrian Arab Republic, Islamic Republic Of Iran, The Democratic People's Republic of Korea, Australia, Netherlands, France, United Kingdom, Portugal, Serbia or Slovakia (the "Prohibited Jurisdictions") are not permitted make use of the Service. For the avoidance of doubt, the foregoing restrictions on engaging in real-money play from Prohibited Jurisdictions applies equally to residents and citizens of other nations while located in a Prohibited Jurisdiction. Any attempt to circumvent the restrictions on play by any persons located in a Prohibited Jurisdiction or Restricted Jurisdiction, is a breach of this Agreement. An attempt at circumvention includes, but is not limited to, manipulating the information used by the company to identify your location and providing the company with false or misleading information regarding your location or place of residence.
- The Company reserves the right, at any time, to ask for any KYC documentation it deems necessary to determine the identity and location of a User. The Company reserves the right to restrict the Service, payment or withdrawal until identity is sufficiently determined, or for any other reason in the company's sole discretion. The company also reserves the right to disclose a User's information as appropriate to comply with legal process or as otherwise permitted by the privacy policy, and by using the Service, you acknowledge and consent to the possibility of such disclosure.

Sanctions, Persons and Entities of Special Interest as well as PEPS

The www.opensanctions.org database is used for screenings of open sanctions. This website is a global database of persons and companies of political, criminal, or economic interest. It combines the most important sanctions lists, databases of politically exposed persons, and other public information into a single easy-to-access dataset.

To ensure these checks Duelbits will have a subscription to namescan.io

Furthermore, duelbits.com will be supported by UNISERV in their checks for possible fraud, companies of political, criminal interests. Their advanced system is fully in cooperation with the internal system from Liquid Entertainment N.V..

Risk Management

Duelbits categorizes nations into three risk regions:

Region one: Low risk

For every nation from the region one, the three-step verification is done.

Region two: Medium risk

For every User/Customer from any nation, which is on the medium-risk list AML verification will be done at the lower deposit, withdrawal thresholds.

Region three: High risk — banned.

Regions of high risks will be banned. High-risk regions will be regularly updated to keep up with the changing environment of a fast-changing world.

Please check our Terms of Service for a list of the current restricted and banned regions.

Cryptocurrency

As part of Liquid Entertainment N.V.'s risk management, every crypto deposit is automatically checked for abuse using two different platforms simultaneously.

Ongoing Transaction Monitoring

AML Compliance ensures that an “ongoing transaction monitoring” is conducted to detect transactions that are suspicious or unusual compared to the User/Customer profile. This transaction monitoring is conducted on different levels.

Reporting of Suspicious Transactions

Depending on the result of examination arising from internal procedures with respect to suspicious transactions and based on the information gathered, the AML team:

- will decide whether it is necessary or not to send a report to the FIU, following the legal obligations provided in the Law of 18 September 2017

- will decide whether or not it is necessary to terminate the business relations with the customer.

Record Keeping

These data will be safe, encrypted stored offline, and online.

Auditing

Internal audit regularly establishes missions and reports about AML activities.

Data Security

All data given by any User/Customer will be kept secure, will not be sold or given to anyone else. Only if forced by law, or to prevent money laundering data may be shared with the AML-authority of the affected state. For further information regarding Your private data please read our Privacy Policy.

Duelbits follows all guidelines of the data protection directive (Directive 95/46/EC).