

Player Funds Protection & Segregation Policy

1. Policy Statement

Zozo Technology B.V. (the “Company”) is committed to safeguarding player funds in full compliance with Curaçao Gaming Control Board (CGA) regulations. The Company maintains strict financial controls to segregate player balances from operational accounts, ensuring player deposits are secure, accessible, and protected at all times.

2. Purpose

The purpose of this policy is to establish robust measures for protecting player funds and ensuring financial transparency in line with Curaçao licensing requirements. The policy outlines how the Company segregates player balances, maintains liquidity, and secures both fiat and cryptocurrency deposits.

3. Scope & Applicability

This policy applies to all employees, directors, compliance officers, finance personnel, payment processors, crypto custodians, and third-party service providers involved in managing or securing player funds.

4. Regulatory Framework

This policy is designed in accordance with Curaçao Gaming Control Board guidelines, AML/CTF obligations, and international standards for the safeguarding of customer assets, including cryptocurrency management best practices.

5. Segregation of Player Funds

The Company maintains fully segregated accounts for player funds, separate from operational and corporate accounts. This ensures that:

- Player deposits are not used for operational expenses.
- Adequate liquidity is always maintained to cover all player withdrawal requests.
- Daily reconciliations are conducted to ensure player balances match available funds.

6. Acceptable Payment Methods

The Company accepts multiple secure payment options, including:

- Credit/debit cards and e-wallets
- Bank transfers and authorized PSPs
- Cryptocurrency deposits through monitored hot and cold wallets

7. Crypto-Specific Player Fund Safeguards

Given the Company's integration of cryptocurrency payments, enhanced controls are applied:

- Use of segregated hot and cold wallets for player funds.
- Real-time reconciliation of crypto deposits and withdrawals.
- Blockchain analytics integration to monitor suspicious transactions.

- Two-factor authentication and multisignature approval for wallet operations.
- Periodic third-party audits of crypto custody arrangements.

8. Risk Management & Liquidity Controls

To safeguard player funds, the Company implements:

- Daily reconciliation of all player balances.
- Minimum liquidity thresholds to ensure full coverage of withdrawals.
- Escalation procedures in case of shortfalls or payment processing issues.
- Continuous monitoring of payment processors and PSP performance.

9. Reporting Obligations

The Company maintains transparent reporting processes to comply with CGA and FIU Curaçao requirements:

- Daily logs of player deposits, withdrawals, and balances.
- Monthly internal financial reports.
- Immediate notification to CGA in case of liquidity incidents or operational disruptions.

10. Record-Keeping

The Company retains records of player balances, reconciliations, audits, and financial statements for a minimum period of five (5) years, ensuring they are readily available for regulatory inspections.

11. Internal Responsibilities

- Compliance Officer: Ensures reporting obligations to CGA and FIU are met.
- Finance Department: Oversees segregation, reconciliations, and liquidity controls.
- IT & Security Teams: Maintain wallet security, payment infrastructure, and anti-fraud monitoring.

12. Training & Awareness

All employees involved in managing player funds receive annual training on:

- Curaçao regulatory requirements.
- Secure payment processing practices.
- Crypto custody security controls.
- AML/CTF reporting obligations.

13. Contact Information

For inquiries or escalations regarding player funds protection, please contact:

Email: legal@jb.com

Phone: