

# OPERATIONAL MANUAL

In accordance with Article 5.9 of the  
**Landsverordening op de Kansspelen (LOK)**

## Famagousta B.V.

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|                 |                                                      |
|-----------------|------------------------------------------------------|
| Document Type   | Operational Manual (Operationele Gebruiksaanwijzing) |
| Legal Basis     | Article 5.9, LOK (Landsverordening op de Kansspelen) |
| License Holder  | Famagousta B.V.                                      |
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| Document Status | Compliance Submission                                |
| Version         | 1.0                                                  |
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## 1. Games Offered, Payment Methods, Bets, Payouts & Software

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### 1.1 Games Portfolio

Famagousta B.V. offers the following categories of online gaming products to registered players:

- Casino & Slots: RNG-certified slot machines, video poker, and table games including roulette, blackjack, and baccarat, sourced from licensed game suppliers.
- Live Casino: Real-time dealer games streamed from certified studios, including Live Blackjack, Live Roulette, Live Baccarat, and Live Game Shows.
- Sports Betting: Pre-match and in-play wagering on international sports markets including football, basketball, tennis, and esports.
- Poker: Online poker games and tournaments including Texas Hold'em, Omaha, and Sit & Go formats.

### 1.2 Payment Methods

The operator supports the following payment methods for deposits and withdrawals, subject to player verification:

- Credit/Debit Cards (Visa, Mastercard)
- Bank Transfer / SEPA
- E-wallets (Skrill, Neteller, and other approved providers)
- Cryptocurrency (where permitted under applicable regulations)

All transactions are processed through PCI-DSS compliant payment processors. Deposits and withdrawals are subject to KYC/AML verification.

### 1.3 Bets, Stakes & Payouts

Minimum and maximum stake limits are defined per game type and configured within the gaming platform, subject to responsible gambling controls. Return-to-Player (RTP) percentages are disclosed to players at the point of game selection.

### 1.4 Software & Platform

The gaming platform operates using certified third-party iGaming software including:

- Core gaming engine with RNG certification
- Player account management and wallet system
- Sports betting engine with real-time odds feeds
- Live dealer streaming integration
- Responsible gambling module
- KYC/AML compliance tools

## 2. Periodic Testing Methods for Quality Control

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- RNG Certification: All RNGs independently tested and certified by accredited laboratories (e.g., eCOGRA, BMM, GLI) on a periodic basis.
- Game Integrity Audits: Regular audits of game logic, payout calculations, and player outcome distributions.



- Platform Security Testing: Annual penetration testing and vulnerability assessments by qualified third-party security firms.
- Payment Reconciliation: Daily automated reconciliation of player accounts, transactions, and game outcomes.
- Responsible Gambling Tool Testing: Deposit limit, self-exclusion, and session controls tested after every software update.
- Incident Logging: All platform incidents and downtime events are logged and reviewed by the technical operations team.

### 3. Storage of Personal Data & Player Data

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#### 3.1 Data Categories Stored

- Identity data: Full name, date of birth, nationality, identification document type and number
- Contact data: Email address, telephone number, residential address
- Account data: Username, account number, registration date, account status
- Financial data: Deposit/withdrawal history, wallet balances, payment method details (tokenised)
- Gaming data: Game history, session data, bet history, win/loss records
- Compliance data: KYC verification status, AML screening records, self-exclusion flags

#### 3.2 Critical Data — Article 5.9(j) Digital Registration

In compliance with Article 5.9(1)(j) of the LOK and the Ministerial Regulation on Digital Registration of Remote Gambling, Famagousta B.V. maintains a digital registration of critical player data stored in a Tier IV certified datacenter located in Curaçao (see Section 6 for infrastructure details).

The following critical data is stored at minimum weekly:

- Unique player identification code (non-directly traceable to identity)
- Player account number, registered age, domicile, identification document type and number
- Total deposits and withdrawals per player per calendar day
- Total bets placed per player per calendar day
- Total losses per player per calendar day, including wins paid out, bonus credits, and blocked wins under fraud investigation
- Opening and closing balance per player per calendar day, including freely withdrawable amounts

All critical data is secured with end-to-end encryption (in transit and at rest). A separate backup is maintained in the Curaçao Tier IV environment, physically/logically separated from primary storage. Data is retained for a minimum of 3 years. Deletion requires prior written authorization from the CGA.



## 4. Visual Elements Presented to Players

- Operator logo, brand identity, and licensing information prominently displayed on all pages.
- CGA license information (license number and validity) displayed in the website footer.
- Responsible gambling logos, self-exclusion tool links, and helpline references visible throughout the platform.
- Game-specific RTP percentages, minimum/maximum stakes, and game rules accessible prior to and during gameplay.
- Age restriction notices (18+) displayed on all entry points.
- Promotional terms and conditions clearly displayed alongside all bonus offers.

## 5. Technical Measures to Prevent Ineligible Participation

- Age Verification: Mandatory age verification at registration; documentary proof required before withdrawals are processed.
- Geolocation & IP Blocking: IP-based geolocation restricts access from prohibited jurisdictions.
- Self-Exclusion Registry Checks: Registrations cross-checked against applicable self-exclusion registries prior to account activation.
- Duplicate Account Detection: Technical controls detect duplicate registrations across name, DOB, payment method, and device fingerprinting.
- PEP & Sanctions Screening: Automated screening at registration and ongoing against PEP lists and international sanctions databases.
- Session & Deposit Controls: Mandatory responsible gambling controls built into the account setup process.

## 6. Technical Infrastructure & Disaster Recovery

### 6.1 Infrastructure Overview

Famagousta B.V. operates a two-server infrastructure to meet both normal operational and Article 5.9(j) compliance requirements:

| Parameter         | Primary Production Server (Cyprus)         | Backup Server — Art. 5.9(j) (Curaçao)         |
|-------------------|--------------------------------------------|-----------------------------------------------|
| <b>Purpose</b>    | Primary operations / main platform hosting | Article 5.9(j) compliant critical data backup |
| <b>Provider</b>   | HostingB2B / NEXTO DEV                     | Flutter Networks N.V. / HostingB2B            |
| <b>Location</b>   | Cyprus                                     | Willemstad, Curaçao                           |
| <b>Datacenter</b> | HostingB2B H2B-CY02<br>Nicosia Cyprus      | Tier IV Certified Datacenter,<br>Curaçao      |
| <b>Hostname</b>   | Nexto.dev                                  | hs-101-cu.hostingb2b.com                      |

|            |                |                |
|------------|----------------|----------------|
| IP Address | 176.111.175.34 | 190.123.23.114 |
| OS         | Debian 12      | Debian 12      |

## 6.2 Disaster Recovery & Business Continuity

- Regular automated backups of all critical data and system configurations.
- Separate Article 5.9(j) backup environment in Curaçao Tier IV datacenter, logically separated from primary storage.
- Defined Recovery Time Objective (RTO) and Recovery Point Objective (RPO) documented in the operator's IT continuity plan.
- 24/7 monitoring of server performance, uptime, and security events.
- Quarterly review of disaster recovery procedures and backup integrity.

## 7. Responsible Gambling Implementation

- Deposit Limits: Players set daily, weekly, and monthly limits. Reductions take effect immediately; increases require a mandatory cooling-off period.
- Session Time Limits & Reality Checks: Players may set session restrictions; pop-up notifications display time and net session result.
- Loss Limits: Daily, weekly, and monthly loss limits available to all players.
- Self-Exclusion: Voluntary exclusion for defined periods (minimum 6 months) or permanently. Excluded players are blocked from platform access and marketing.
- Affordability Checks: Enhanced due diligence conducted where player behaviour indicates potential financial harm.
- Staff Training: All relevant personnel receive annual responsible gambling training per Article 5.9(4).
- Third-Party Support: Links to independent gambling support organisations displayed prominently throughout the platform.

## 8. General Terms & Conditions

The current General Terms & Conditions are published on the Famagousta B.V. gaming website and accessible at all times. They cover eligibility requirements, account registration and KYC, deposits and withdrawals, bonus terms, responsible gambling tools, game rules, account closure, and governing law. Players accept the T&Cs at registration and are notified of material changes in advance.

## 9. Dispute Resolution

- First Contact: Complaints submitted via live chat, email, or telephone support.
- Acknowledgement: All complaints acknowledged within 24 hours of receipt.
- Initial Resolution: Customer support team targets resolution within 5 business days.
- Escalation: Unresolved complaints escalated to compliance and management within 10 business days.

- External ADR: Players directed to the applicable ADR body recognised by the CGA if internal resolution is not reached.
- Record Keeping: All complaints and outcomes logged and retained for a minimum of 5 years.

## 10. Digital Registration — Article 5.9(j) Compliance Summary

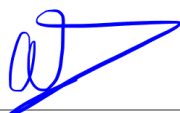
| Requirement                                   | Status / Details                                                                                                         |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| <b>Tier IV Datacenter in Curaçao (backup)</b> | Flutter Networks N.V. / HostingB2B — hs-101-cu.hostingb2b.com — Willemstad, Curaçao                                      |
| <b>Primary production server</b>              | <b>HOSTINGB2B / NEXTO DEV 176.111.175.34</b>                                                                             |
| <b>Critical Data Stored Weekly</b>            | Player ID, account info, deposits/withdrawals, bets, wins/losses, balances — stored at minimum every 7 days              |
| <b>End-to-End Encryption</b>                  | All critical data encrypted in transit and at rest per accepted industry standards                                       |
| <b>Separate Backup (Tier IV Curaçao)</b>      | Curaçao VPS (190.123.23.114) maintained as the Article 5.9(j) compliant backup, separate from primary Cyprus environment |
| <b>3-Year Data Retention</b>                  | Critical data retained for minimum 3 years; deletion requires CGA written approval                                       |
| <b>CGA Access Guaranteed</b>                  | Hosting agreement with Flutter Networks / HostingB2B includes CGA access provisions                                      |
| <b>First Invoice as Proof</b>                 | Proforma Invoice provided as evidence of operational Curaçao hosting                                                     |

## Declaration

This Operational Manual has been prepared in accordance with Article 5.9 of the Landsverordening op de Kansspelen (LOK) and the associated Ministerial Regulation on Digital Registration of Remote Gambling.

Signed on behalf of Famagousta B.V.:

Date:



Andrea Maria Engelhardt  
Authorised Signatory

eMagnus Curacao B.V.

Managing Director

25 June 2026

