



OPERATIONAL MANUAL

Article 5.9 National Ordinance on Games of Chance (LOK)

License Holder:

RSP Entertainment N.V.

Registered number: 101703

Operating brand: RedStar

Licensing Authority:

Curaçao Gaming Authority (CGA)

License Number:

OGI/2024/168/0127

Jurisdiction:

Curaçao

Effective Date: 01/01/2026

Purpose of this Manual

This Operational Manual is established in accordance with Article 5.9 of the National Ordinance on Games of Chance (LOK).

It describes the organizational structure, governance arrangements, internal controls, and operational procedures implemented by RSP Entertainment N.V. to ensure that gambling operations are conducted in a controlled, reliable, transparent, and socially responsible manner.

This manual demonstrates how operational controls are applied in practice and serves as primary evidence of compliance for supervisory and audit purposes.

Scope

This manual applies to all gambling activities operated under the RedStar brand and covers:

- Governance and internal organization
- Risk management and control effectiveness
- Player lifecycle management
- AML/CFT and fraud prevention
- Responsible Gambling and marketing controls
- Complaints handling and dispute resolution
- IT security, data protection, and system integrity
- Record keeping, training, and operational continuity

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Regulatory Status

This Operational Manual is maintained as a living document and is reviewed at least annually, or earlier where required due to regulatory changes, operational developments, or audit findings.

The manual is available to the Curaçao Gaming Authority upon request.

PART 1 – GOVERNANCE, LICENSING, ORGANIZATION & RISK MANAGEMENT

1. Purpose of the Operational Manual

This Operational Manual is established in accordance with Article 5.9 of the National Ordinance on Games of Chance (LOK) and documents in detail the organizational structure, governance framework, and operational controls implemented by RSP Entertainment N.V., operating under the RedStar brand.

The purpose of this manual is to demonstrate to the Curaçao Gaming Authority (CGA) that the RedStar:

- Conducts gambling operations in a controlled, transparent, and responsible manner
- Maintains effective internal organization and governance
- Identifies, manages, and mitigates operational, regulatory, and social risks
- Protects players, player funds, and the integrity of gambling activities
- Ensures compliance with all applicable Curaçao laws and regulatory requirements

This manual describes how operations are conducted in practice, not merely the existence of policies. It forms a core element of the RedStar compliance framework and is maintained as primary audit evidence.

2. Legal Basis and Regulatory Framework

2.1 Applicable Legislation

RSP Entertainment N.V. operates under the legal framework of Curaçao and is subject to, inter alia:

- National Ordinance on Games of Chance (LOK)
- National Ordinance on Identification when Rendering Services (NOIS)
- National Ordinance on the Reporting of Unusual Transactions (NORUT)
- Sanctions National Ordinance
- Applicable Ministerial Decrees and CGA guidance

The Operator is licensed by the Curaçao Gaming Authority under license number OGL/2024/168/0127 and is required to demonstrate continuous compliance with Article 5.9 LOK, which mandates adequate organization, control, and operational integrity.

2.2 Regulatory Oversight

The Curaçao Gaming Authority exercises supervisory oversight over the RedStar.

RedStar cooperates fully with the CGA and provides access to:

- Operational documentation
- Internal records
- Transaction data
- Compliance reports
- Systems and logs, where required

Regulatory information, including license details and regulatory oversight statements, is displayed on all gambling websites operated by the Company.

3. Corporate Identity and Business Profile

3.1 Corporate Identity

RSP Entertainment N.V. is a company incorporated in Curaçao with registered number 101703. The Company operates under the RedStar brand and provides online gambling services including:

- Online poker
- Online casino games
- Live casino games
- Sports betting

The Company has over 15 years of experience in the iGaming industry and operates internationally.

3.2 Operational Locations

While the Company is incorporated and licensed in Curaçao, operational activities are conducted from Limassol, Cyprus, including:

- Customer support
- Compliance operations
- Marketing management
- IT and technical support
- Finance and payment coordination

Legal accountability, regulatory reporting, and license responsibility remain with the Curaçao entity at all times.

4. Governance Structure and Accountability

4.1 Governance Principles

RedStar maintains a governance framework based on:

- Clear allocation of responsibilities
- Segregation of duties
- Defined reporting lines
- Documented decision-making
- Accountability at senior management level

The governance structure ensures that no single individual exercises uncontrolled influence over gambling operations, financial flows, compliance oversight, or technical systems.

4.2 Senior Management Responsibility

Ultimate responsibility for compliance with the LOK and CGA requirements rests with senior management and the Board. Senior management:

- Approves internal policies and procedures
- Allocates adequate resources for compliance and player protection
- Oversees risk management
- Reviews compliance reports and audit findings
- Ensures corrective actions are implemented

Material compliance matters are escalated without delay.

5. Organizational Structure

5.1 Organizational Model

RedStar maintains a structured organization with the following core business lines:

- Operations and Customer Support
- Compliance
- Finance and Legal
- IT and Technical Support

- Marketing and Affiliates

Each function operates within defined responsibilities and reports through documented lines of authority.

5.2 Key Function Holders

The following key function holders are appointed:

Chief Executive Officer (CEO)

Responsible for overall strategic direction, corporate governance, and regulatory accountability.

Chief Operating Officer (COO)

Responsible for day-to-day gambling operations, product delivery, customer experience, and operational performance across poker, casino, and betting products.

Chief Compliance Officer (CCO)

Responsible for regulatory compliance, AML/CFT, Responsible Gambling, KYC, monitoring obligations, and liaison with the CGA and other authorities.

Chief Financial Officer (CFO)

Responsible for financial controls, segregation of player funds, payment flows, accounting, and financial reporting.

Chief Technology Officer (CTO)

Responsible for platform integrity, system availability, data security, integrations with gaming suppliers, and technical risk management.

5.3 Independence of Compliance Function

The Compliance Officer operates with **independent authority** and has unrestricted access to:

- Player data
- Transaction records
- Operational systems
- Staff and management

The Compliance Officer may escalate issues directly to senior management and, where required, to the CGA.

6. Internal Control Environment

6.1 Segregation of Duties

RedStar enforces segregation of duties between:

- Operational decision-making
- Financial transaction processing
- Compliance monitoring
- Technical administration

For example:

- Customer support staff cannot approve withdrawals
- Marketing staff cannot override Responsible Gambling controls
- Technical staff cannot modify financial records without authorization

6.2 Documentation and Recordkeeping

All operational activities are documented and logged, including:

- Account actions
- Financial transactions
- Compliance interventions
- System changes
- Staff training

Records are retained in accordance with legal and regulatory requirements and are retrievable for audit purposes.

7. Risk Management Framework

7.1 Risk-Based Approach

RedStar applies a risk-based approach across all operations, recognizing that gambling activities present inherent risks, including:

- Gambling-related harm
- Financial crime
- Fraud and abuse
- Data breaches
- Reputational damage

Risks are identified, assessed, mitigated, and monitored on an ongoing basis.

7.2 Business Risk Assessment

The Company conducts a Business Risk Assessment (BRA) that considers:

- Types of gambling products offered
- Player demographics
- Geographic exposure
- Payment methods
- Delivery channels
- Transaction volumes

The BRA incorporates findings from the Curaçao National Risk Assessment and is reviewed at least annually or upon material changes.

7.3 Operational Risk Controls

Operational risks are mitigated through:

- Standardized procedures
- System controls
- Staff training
- Monitoring and reporting mechanisms
- Internal audits and management reviews

8. Management Oversight, Control Effectiveness & Escalation Framework

8.1 Management Control Cycle

RedStar operates a structured management control cycle to ensure that organizational, operational, and compliance controls are not only implemented but remain effective in practice.

The management control cycle follows a continuous **Plan – Do – Check – Act (PDCA)** model:

- **Plan:** Identification of regulatory, operational, financial, and social risks and definition of mitigating controls
- **Do:** Implementation of policies, procedures, system controls, and staff training
- **Check:** Ongoing monitoring, testing, and reporting on the effectiveness of controls
- **Act:** Timely remediation, corrective actions, and continuous improvement where deficiencies are identified

This control cycle applies across all operational areas, including gambling operations, AML/CFT, Responsible Gambling, financial controls, IT security, and customer protection.

8.2 Management Oversight and Reporting

Senior management maintains active oversight over operational and compliance activities through structured reporting and review mechanisms.

At a minimum:

- The Compliance Officer provides quarterly compliance reports to senior management
- Reports cover AML/CFT, Responsible Gambling, player protection, complaints, and regulatory developments
- Material risks, incidents, or breaches are escalated without delay
- Management review outcomes are documented, including decisions taken and actions assigned

Management ensures that sufficient resources, staffing, and system capabilities are maintained to support effective control implementation.

8.3 Control Effectiveness Monitoring

RedStar monitors the effectiveness of its internal controls using qualitative and quantitative indicators.

Control effectiveness monitoring includes, but is not limited to:

- Review of key compliance metrics and operational indicators
- Analysis of trends in Responsible Gambling interventions and outcomes
- Monitoring of AML alerts, escalations, and reporting outcomes
- Assessment of complaint volumes, root causes, and resolution timelines
- Review of system incidents, access logs, and security alerts

Where control weaknesses or recurring issues are identified, remedial measures are defined and tracked to completion.

8.4 Escalation and Decision-Making Authority

Clear escalation thresholds are established to ensure timely and appropriate decision-making.

Issues must be escalated to senior management where they involve:

- Suspected or confirmed money laundering or terrorist financing
- Serious or repeated Responsible Gambling risk indicators
- Significant operational failures or system incidents
- Data breaches or information security incidents
- Regulatory breaches or material non-compliance

The Compliance Officer has the authority to impose temporary restrictions, suspend accounts, or halt specific activities where necessary to mitigate risk, pending management review.

Where legally required, relevant matters are reported to the Curaçao Gaming Authority or other competent authorities without undue delay.

8.5 Independence and Authority of the Compliance Function

The Compliance Officer operates independently from operational and commercial functions.

Safeguards supporting independence include:

- Direct reporting access to senior management
- Unrestricted access to operational systems, data, and staff
- Authority to challenge decisions that may impact regulatory compliance or player protection
- Protection from retaliation or adverse consequences arising from the execution of compliance duties

Compliance decisions may only be overridden by senior management in exceptional circumstances and must be documented with a clear rationale and risk assessment.

8.6 Remediation and Corrective Actions

Where deficiencies, breaches, or control weaknesses are identified, RedStar applies a structured remediation process.

Corrective actions include:

- Definition of remedial measures and responsible owners
- Implementation deadlines proportionate to risk
- Monitoring of progress by Compliance or Internal Audit
- Verification that corrective actions are effective

Material remediation actions and unresolved issues are reported to senior management until fully resolved.

8.7 Documentation and Audit Trail

All management oversight activities are documented and retained, including:

- Compliance and management reports
- Meeting minutes and decisions
- Escalation records and incident logs
- Remediation plans and completion evidence

Documentation is retained in accordance with regulatory requirements and is available for inspection by the Curaçao Gaming Authority upon request.

8.8 Continuous Improvement

RedStar is committed to continuous improvement of its governance and control framework.

Operational controls and procedures are reviewed:

- At least annually
- Following regulatory changes
- After significant incidents or audit findings

Lessons learned are incorporated into policies, systems, training programs, and operational practices to enhance overall control effectiveness and regulatory compliance.

9. Compliance Culture and Training

9.1 Compliance Culture

RedStar promotes a culture where compliance, player protection, and integrity are core operational priorities. Employees are expected to:

- Act in accordance with laws and regulations
- Identify and escalate risks
- Protect players and vulnerable individuals
- Maintain confidentiality and data security

9.2 Training

All employees receive mandatory training covering:

- Responsible Gambling
- AML/CFT obligations
- Data protection and information security
- Incident reporting and escalation
- Training is documented, refreshed regularly, and evaluated for effectiveness.

PART 2 – PLAYER LIFECYCLE, KYC, AML, PAYMENTS & FRAUD CONTROLS

10. Player Lifecycle Management

10.1 Overview

RedStar maintains comprehensive controls covering the entire player lifecycle, from initial registration through active play, monitoring, restrictions, and account closure. These controls ensure compliance with legal requirements, protection of players, and prevention of financial crime.

Player lifecycle management is supported by automated systems and manual oversight by trained operational and compliance staff.

11. Account Registration Procedures

11.1 Registration Requirements

Players may only register for an account after:

- Confirming they are 18 years of age or older
- Providing accurate and complete personal information
- Accepting the Terms and Conditions and applicable policies

Mandatory registration data includes:

- Full name
- Date of birth
- Nationality
- Residential address
- Email address
- Username and password

Anonymous or fictitious accounts are strictly prohibited.

11.2 Duplicate Account Prevention

RedStar employs automated and manual controls to prevent and detect multiple accounts, including:

- Identity matching
- Device and IP analysis
- Behavioral pattern analysis

Where duplicate accounts are detected, accounts are restricted or closed, and relevant balances are handled in accordance with Terms and Conditions and regulatory obligations.

12. Age Verification and Protection of Minors

12.1 Age Controls

Age verification begins at registration through date-of-birth confirmation and declaration. Before the first withdrawal, government-issued photo identification must be verified.

Accepted documents include:

- Passport
- National identity card
- Driver's license

12.2 Underage Gambling

If RedStar identifies or suspects that a player is under 18:

- The account is immediately closed
- Deposits are refunded where legally required
- Winnings are forfeited
- The incident is documented and retained for audit

Records of all age verification attempts and outcomes are retained and made available to the CGA upon request.

13. Know Your Customer (KYC) Procedures

13.1 Customer Due Diligence (CDD)

Customer Due Diligence is conducted:

- Before the first withdrawal
- When transaction thresholds are reached
- When risk indicators arise
- When personal data changes

CDD includes verification of:

- Identity
- Address
- Sanctions and PEP status

No withdrawals or additional deposits are permitted until required verification is completed.

13.2 Enhanced Due Diligence (EDD)

Enhanced Due Diligence is applied where higher risk is identified, including:

- Politically Exposed Persons (PEPs)
- Players from high-risk jurisdictions
- Large or unusual transaction patterns
- Use of anonymity-favoring payment methods

EDD measures include:

- Source of Funds (SoF) and Source of Wealth (SoW) verification
 - Senior management approval
 - Increased transaction monitoring
 - More frequent re-verification
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14. Anti-Money Laundering (AML) Framework

14.1 AML Governance

RedStar maintains a documented AML Program aligned with:

- NOIS
- NORUT
- FATF recommendations
- CGA directives

The AML Program is overseen by the Compliance Officer, who is responsible for implementation, monitoring, reporting, and continuous improvement.

14.2 Risk-Based Approach

RedStar applies a Risk-Based Approach (RBA), comprising:

- Business Risk Assessment (BRA)
- Customer Risk Assessment (CRA)
- Customer Acceptance Policy (CAP)

Players are categorized as low, medium, or high risk, which determines the level of due diligence and monitoring applied.

15. Transaction Monitoring and Ongoing Due Diligence

15.1 Monitoring Systems

All player transactions are subject to ongoing monitoring using:

- Automated transaction monitoring tools

- Manual reviews by compliance staff

Monitoring focuses on:

- Transaction size and frequency
- Deviations from expected player behavior
- Geographic risk
- Payment method risk

15.2 Red Flags and Escalation

Red flags include, but are not limited to:

- Deposit spikes inconsistent with player profile
- Repeated withdrawal cancellations
- Rapid movement of funds
- Structuring of transactions to avoid thresholds

Detected anomalies are escalated to the Compliance Officer for review and decision-making.

16. Suspicious Transaction Reporting

16.1 Reporting Obligations

Where the Compliance Officer knows, suspects, or has reasonable grounds to suspect money laundering or terrorist financing, RedStar submits a report to the FIU Curaçao via GoAML.

Reports include:

- Player identification details
- Transaction information
- Grounds for suspicion
- Supporting documentation

16.2 Confidentiality

Suspicious transaction reporting is conducted confidentially. Players are not informed of reports or investigations (“no tipping-off”).

17. Payments and Withdrawal Controls

17.1 Payment Methods

RedStar accepts only approved, traceable, non-cash payment methods. Cash transactions are prohibited.

17.2 Withdrawal Processing

Withdrawals are:

- Processed only after successful KYC
- Returned to the original payment method where possible
- Subject to compliance review

RedStar does not offer credit. All wagers must be funded from available account balances.

17.3 Segregation of Player Funds

Player funds are held separately from operational funds to protect players in the event of business disruption.

18. Fraud and Abuse Prevention

18.1 Fraud Controls

RedStar maintains systems and procedures to detect and prevent:

- Bonus abuse
- Collusion
- Arbitrage betting
- Use of bots or prohibited software
- Payment fraud

18.2 Investigations and Sanctions

Where fraud or abuse is suspected:

- Accounts may be temporarily restricted
- Investigations are conducted
- Outcomes are documented
- Accounts may be suspended or permanently closed

Decisions are based on objective evidence and are proportionate to the identified risk.

19. Account Restrictions and Closures

Accounts may be restricted or closed due to:

- AML concerns
- Fraud or abuse
- Responsible Gambling interventions
- Regulatory or legal requirements

All actions are documented and retained for audit.

PART 3 – RESPONSIBLE GAMBLING, PLAYER PROTECTION & MARKETING CONTROLS

20. Responsible Gambling Governance

20.1 Responsible Gambling Strategy

RedStar maintains a comprehensive Responsible Gambling (RG) framework designed to minimize the potential for gambling-related harm and to support players in making informed and responsible decisions about their participation in gambling.

Responsible Gambling is embedded into RedStar's organizational culture, governance structure, and daily operations. Senior management sets a clear tone from the top, establishing Responsible Gambling as an operational priority across all departments.

Responsible Gambling strategy includes:

- Prevention and early identification of gambling-related harm
- Player empowerment through tools and information
- Proactive interventions when risk indicators are detected
- Continuous monitoring and improvement of RG measures

20.2 Responsible Gambling Oversight

Responsibility for the implementation and effectiveness of Responsible Gambling measures rests with the Responsible Gambling Officer. Until a dedicated RG Officer is appointed, these duties are assumed by the Compliance Officer.

Responsible Gambling oversight includes:

- Monitoring player behavior and risk indicators
- Ensuring availability and effectiveness of RG tools
- Staff training and awareness
- Reporting to senior management
- Recommending improvements to RG controls

An annual Responsible Gambling report is prepared for management review and retained for regulatory inspection.

21. Player Information and Informed Decision-Making

21.1 Availability of Responsible Gambling Information

RedStar ensures that players have access to clear, accurate, and easily accessible information to support informed decision-making.

Responsible Gambling information is available:

- On dedicated Responsible Gambling sections of the website
- Within the Terms and Conditions
- Via customer support upon request

Information provided includes:

- How gambling products work
- Common misconceptions about gambling
- Risks associated with gambling
- Available Responsible Gambling tools
- Access to professional support organizations

Responsible Gambling information is no more than one click away from the homepage.

21.2 Session Awareness and Reality Checks

To support informed play, RedStar provides tools that allow players to monitor their gambling activity in real time.

These tools include:

- Real-time session clocks
- Session time reminders
- Periodic pop-up reality checks displaying session duration, wins, and losses
- Confirmation prompts requiring players to acknowledge continued play

Customized reality checks temporarily suspend play until acknowledged by the player.

22. Player Limits and Control Tools

22.1 Deposit Limits

Players may set deposit limits on a:

- Daily basis
- Weekly basis
- Monthly basis

Rules governing deposit limits:

- Requests to decrease limits take effect immediately
- Requests to increase limits are subject to a mandatory 24-hour cooling-off period
- Deposit limits do not cancel existing wagers but prevent further deposits once reached

All limit changes are logged and retained for audit purposes.

22.2 Cooling-Off Periods

RedStar provides a Cooling-Off facility allowing players to temporarily restrict access to gambling activities for:

- 24 hours
- 7 days
- 1 month
- 3 months

Cooling-Off periods:

- Are self-initiated by players via account settings
 - Prevent all gambling activity during the selected period
 - Allow withdrawals of remaining funds
 - Optionally suspend marketing communications
 - Automatically expire after the selected duration
-

23. Self-Exclusion Procedures

23.1 Voluntary Self-Exclusion

RedStar offers voluntary self-exclusion options with the following durations:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

Self-exclusion applies across all brands and domains operated under the Operator's license.

During the self-exclusion period:

- Players cannot log in, deposit, or gamble

- Marketing and promotional communications are blocked
- Accounts remain inaccessible

Before activation, players must confirm their chosen duration through a neutral confirmation message.

23.2 Reactivation and Permanent Exclusion

Temporary self-exclusion may only be lifted after:

- The full exclusion period has expired
- A written request is submitted by the player
- The request is not initiated by RedStar

Lifetime self-exclusion is permanent and cannot be reversed.

RedStar maintains controls to:

- Identify duplicate accounts
- Prevent re-registration by self-excluded players

23.3 Operator-Initiated Exclusion

RedStar reserves the right to exclude players where there are indications of:

- Gambling-related harm
- Fraudulent behavior
- Criminal activity

Operator-initiated exclusions:

- Are documented with justification
- Are retained for a minimum of five years
- Are never based solely on player winnings

24. Identification of Gambling-Related Harm

24.1 Behavioral Monitoring

RedStar actively monitors player behavior using:

- Data-driven monitoring systems
- Observations by trained customer support and compliance staff

Risk indicators include, but are not limited to:

- Sudden or repeated deposit increases
- Extended gaming sessions
- Frequent failed deposits
- Withdrawal cancellations
- Rapid changes to RG tools
- Communications indicating distress or loss of control

24.2 Structured Interventions

When risk indicators are detected, RedStar initiates structured interventions, which may include:

- Contacting the player with Responsible Gambling information
- Encouraging use of RG tools
- Applying temporary account restrictions
- Offering self-exclusion options
- Referring players to professional support resources

All interventions are documented and retained for audit purposes.

25. Self-Assessment and External Support

25.1 Self-Assessment Tools

Players are encouraged to complete self-assessment questionnaires to evaluate their gambling behavior, including:

- Gamblers Anonymous “20 Questions”
- CAGE Questionnaire

Players indicating risk are directed to appropriate Responsible Gambling tools and external support.

25.2 Professional Help and Stakeholder Engagement

RedStar provides direct access to professional help resources, including:

- Gambling Therapy
- GambleAware
- Responsible Gambling Council
- Gamblers Anonymous

RedStar is committed to cooperation with stakeholders, researchers, and support organizations to continuously improve harm prevention measures.

26. Marketing and Advertising Controls

26.1 Marketing Governance

All marketing and promotional activities are subject to internal controls and oversight to ensure compliance with Responsible Gambling and regulatory standards.

Marketing activities are coordinated centrally and monitored by compliance staff.

26.2 Prohibited Marketing Practices

Marketing and advertising materials must not:

- Target minors or vulnerable persons
- Misrepresent odds, chances of winning, or game outcomes
- Suggest gambling as a solution to financial hardship
- Portray gambling as a source of guaranteed income
- Use emotional manipulation
- Promote alcohol, drugs, or unhealthy behavior
- Feature minors or underage actors

26.3 Responsible Gambling Messaging

All promotional communications:

- Include visible Responsible Gambling messages
- Provide links to support resources
- Avoid misleading or deceptive claims

Affiliate partners are contractually required to comply with these standards and are actively monitored by RedStar.

PART 4 – COMPLAINTS, IT SECURITY, RECORD KEEPING, TRAINING & OPERATIONAL CONTINUITY

27. Player Complaints and Dispute Resolution

27.1 Complaint Handling Framework

RedStar maintains a transparent, accessible, and documented complaints handling framework designed to ensure fair and timely resolution of player complaints.

Players are informed of their right to submit complaints via:

- Website terms and conditions
- Dedicated complaints policy
- Customer support communications

The complaints framework ensures compliance with CGA requirements and supports player trust and regulatory transparency.

27.2 Submission of Complaints

Players may submit complaints within six (6) months of the incident or, where applicable, within six months from the resolution of a gambling outcome.

Complaints must be submitted via designated email addresses and include:

- Player's full name and address
- Username or account number
- Date of complaint
- Description of the issue
- Supporting documentation (where available)
- Preferred language (English or local market language)

Incomplete complaints may require additional information before assessment.

27.3 Complaint Classification and Prioritization

Complaints are categorized upon receipt, including:

- Responsible Gambling complaints
- Financial or payment-related complaints
- Account restriction or closure complaints
- Game outcome disputes
- Technical or system-related complaints
- Data protection or privacy concerns

Responsible Gambling complaints are treated as priority cases due to potential player harm.

27.4 Complaint Resolution Process

RedStar applies defined timelines:

- Responsible Gambling complaints are acknowledged promptly and resolved within five (5) business days, unless exceptional circumstances apply
- General complaints are acknowledged within seven (7) days
- Standard resolution is completed within four (4) weeks
- Complex cases may be extended by a further four weeks with prior notice to the player

Players receive a written response outlining:

- The decision reached
- Supporting rationale and evidence
- Any remedial actions taken

27.5 Escalation and Alternative Dispute Resolution (ADR)

If a player remains dissatisfied, they may escalate the complaint to an approved Alternative Dispute Resolution (ADR) provider.

The Curaçao Gaming Authority does not mediate individual disputes but accepts reports where players allege regulatory non-compliance.

Complaint records, including outcomes and escalations, are retained for a minimum of five (5) years.

28. Information Security and IT System Integrity

28.1 Information Security Objectives

RedStar maintains comprehensive information security controls to ensure:

- Confidentiality of player data
- Integrity and fairness of games
- Availability and reliability of systems
- Protection against fraud and unauthorized access

Information security is integrated into operational processes and governance oversight.

28.2 Data Protection and Privacy

Personal data collected includes identification, contact, and payment-related information required for lawful operations.

Data protection measures include:

- Compliance with GDPR principles
- Secure storage in monitored environments
- Restricted access based on role and necessity
- Retention periods of at least five years, and seven years for self-excluded players

Players are informed of their rights to access, rectify, erase, or transfer personal data.

28.3 Access Controls and Authentication

RedStar enforces strict access controls:

- Unique login credentials for all users
- Prohibition of anonymous or pseudonymous accounts
- Multi-step identity verification
- Role-based system access for employees

Unauthorized access attempts are logged and investigated.

28.4 Encryption and Data Transmission

All communications between players and the RedStar's systems are encrypted using industry-standard protocols (SSL/TLS).

Sensitive data, including financial and gameplay information, is protected against interception and tampering.

28.5 Game Integrity and Fairness

Game fairness is ensured through:

- Use of certified Random Number Generators (RNG)
- Independent testing and certification
- Continuous monitoring for collusion, bots, or prohibited software

Detected violations result in investigation, account suspension, or permanent closure.

28.6 Monitoring, Incident Response, and Audits

Systems are continuously monitored through:

- Real-time alerts
- Log reviews
- Security scans

In the event of a security incident:

- Immediate containment measures are applied
- Investigations are conducted
- Corrective actions are implemented
- Incidents are documented and reviewed

Annual penetration testing and third-party security assessments are conducted.

29. Record Keeping and Audit Readiness

29.1 Record Retention

RedStar maintains complete and accurate records relating to:

- Player registration and verification
- Transactions and payments
- AML reviews and reports
- Responsible Gambling interventions
- Complaints and dispute outcomes
- Staff training and certifications
- System changes and security incidents

Records are retained in accordance with legal and regulatory requirements and are retrievable without delay.

29.2 Availability for Regulatory Inspection

All records are maintained in a manner that allows:

- Prompt retrieval
- Secure access
- Provision to the CGA upon request

RedStar cooperates fully with audits and inspections.

30. Training and Staff Competence

30.1 Mandatory Training Programs

All employees receive mandatory training covering:

- Responsible Gambling principles
- AML/CFT obligations
- Data protection and information security
- Fraud detection and escalation procedures

Training is tailored to job roles and refreshed at least annually.

30.2 Documentation and Evaluation

Training completion is documented by:

- Employee name
- Date of training
- Scope and content
- Assessment results

Training programs are evaluated regularly to ensure effectiveness and alignment with regulatory expectations.

31. Business Continuity and Operational Resilience

31.1 Continuity Planning

RedStar maintains business continuity and disaster recovery arrangements designed to ensure:

- Continuity of gambling services
- Protection of player funds
- Preservation of data integrity
- Timely recovery following incidents

Plans are tested periodically and updated as required.

32. Internal Audit and Continuous Improvement

32.1 Internal Reviews

RedStar conducts internal reviews and independent testing of:

- AML and Responsible Gambling controls
- Transaction monitoring systems
- Security controls
- Complaints handling effectiveness

Findings are documented and corrective actions are tracked to completion.

32.2 Continuous Improvement

Operational controls, policies, and procedures are reviewed:

- At least annually
- Following regulatory changes
- After audit findings or incidents

Material changes are escalated to senior management and, where required, reported to the CGA.