

OPERATIONS MANUAL

Galaktika N.V.

Version: 1.0

1. Introduction	4
2. Games and software description	4
2.1. Gaming Portfolio	4
2.2. Payment possibilities, bets, and payout mechanics	5
2.3. Software and outcome-determining elements	6
3. Quality monitoring and testing	7
3.1. RNG certification and testing by accredited testing laboratories (ATLs)	7
3.2. Periodic vulnerability and penetration testing	7
4. Data protection and storage	8
4.1. Data protection	8
4.2. Data storage and retention	8
4.3. Data breach and incident management	9
5. Visual interface specifications	9
5.1. Website UI/UX standards mandatory CGA trust seals	9
5.2. Persistent In-Game session and balance indicators	9
6. Access control and banned persons exclusion	9
6.1. GeoIP geolocation blocks and restricted jurisdictions	9
7. Technical infrastructure and disaster recovery	10
7.1 Technical Infrastructure and System Architecture	11
7.2 Games of Chance, Payments, Software, and Outcome Determination	11
7.3 Disaster Recovery and Technical Emergency Restoration	12
8. Responsible gaming policy	12
8.1. Underage gambling prevention (Zero Tolerance)	12
8.2. Player protection tools and limits	12
8.3. Cooling-Off and Self-Exclusion	13
8.4. Behavior monitoring and chat assessment	13
8.5. Marketing restrictions and data audit	14
9. General terms and conditions	14
10. Player dispute resolution framework	14
10.1. Introduction and regulatory framework	15
10.2. Definition of a complaint (Incident)	15
10.3. Procedure for complaints (Incidents) and operational timelines	15
10.4. Alternative Dispute Resolution (ADR)	16
10.5. Escalation to the Curaçao Gaming Authority (CGA)	16

10.6. Record-Keeping and Bi-Annual Regulatory Reporting	16
11. Digital record and local server	17

1. Introduction

Galaktika N.V., registered under company number 140803 and holding Curaçao B2C Online Gaming Licence No. OGL/2024/169/0146, is a company incorporated in Curaçao and authorized to provide online gaming services.

The Company provides online gaming services through websites and domains approved under its Curaçao B2C Online Gaming Licence.

This Operational Manual has been prepared in accordance with Article 5.1 of the National Ordinance for Games of Chance (LOK) and outlines the Company's operational framework, internal controls, and compliance measures applicable to its licensed gaming activities.

2. Games and software description

2.1. Gaming Portfolio

Galaktika N.V. (the “Company”) operates remote games of chance offering a diverse portfolio of online games supplied by licensed and approved gaming providers. The gaming portfolio may include, but is not limited to, the following categories:

Live Casino Games: Real-time gaming products broadcast from licensed studio environments and operated by live dealers. Outcomes are determined through physical gaming equipment and live procedures, supported by monitoring, capture, and verification technologies to ensure integrity.

Instant Win and Original Games: A category of proprietary and third-party online games, including crash games, dice-based formats, plinko-style mechanics, wheel games, and other innovative products. Depending on the specific game, outcomes may be generated via certified RNG systems, provably fair algorithms, cryptographic verification methods, or other approved outcome-generation technologies.

Slot Games: Digital reel-based gaming products in which results are generated using certified Random Number Generator (RNG) systems or other approved randomization technologies provided by the relevant game supplier.

Table Games: Digital adaptations of traditional casino games, including but not limited to blackjack, roulette, baccarat, poker variants, dice games, and similar offerings. Game outcomes are produced through RNG technology or other approved game-specific systems designed to ensure randomness and fairness.

Sports Betting and Virtual Sports: Wagering products covering both real-life sporting events and simulated (virtual) sports competitions. Settlement is determined based on official results, validated data feeds, or other approved grading and settlement processes supplied by authorized providers.

Cryptocurrency-Compatible Games: Gaming products that enable wagering and settlement using one or more supported digital assets. These products are governed by the same principles of fairness, integrity, and verifiable outcome determination as other games available on the platform.

Jackpot Games: Gaming products connected to either standalone or progressive jackpot mechanisms, where a portion of qualifying stakes may be allocated to a pooled prize fund. Jackpot growth, activation criteria, and prize distribution are handled through automated systems operated by the respective game provider or platform operator.

The specific gaming content made available on the platform is subject to change from time to time and may vary based on commercial agreements, applicable regulatory requirements, integration with third-party suppliers, and other operational or technical considerations.

2.2. Payment possibilities, bets, and payout mechanics

The Company enables players to access a range of payment solutions through duly licensed and approved payment service providers, banking institutions, electronic payment platforms, and cryptocurrency payment processors, where permitted and available within the relevant jurisdiction.

The Platform facilitates transactions in various fiat currencies and, where applicable, approved cryptocurrencies. The availability of specific payment methods and currencies may be subject to the player's jurisdiction, applicable regulatory requirements, risk assessment outcomes, and operational considerations.

Players may deposit funds into their gaming accounts using the payment methods made available on the Platform. Funds are credited to the player's account only upon successful authorization, processing, and confirmation of the transaction by the relevant payment service provider or financial institution.

The Company establishes minimum and maximum limits for deposits, wagers, and withdrawals. Such limits may vary based on the selected payment method, requirements imposed by game providers, the player's account status, risk management assessments, responsible gaming measures, and other operational or regulatory considerations. Where applicable, the relevant limits are communicated to players through the Platform. All wagering transactions are electronically recorded within the Company's gaming system at the time they are placed. Upon the completion of a game, betting event, gaming round, wagering market, or other gambling activity, the outcome is generated and determined by the relevant gaming or betting system and is automatically transmitted to the Platform for processing and settlement.

Winning amounts are calculated automatically in accordance with the applicable game rules, paytables, jackpot terms, betting odds, and settlement procedures. Upon settlement, any winnings are credited directly to the player's account balance and may

be used for further wagering activities or requested for withdrawal, subject to applicable account verification requirements, compliance reviews, fraud prevention controls, and risk management procedures.

Withdrawal requests are handled in accordance with the Company's internal processes, Anti-Money Laundering (AML) requirements, Know Your Customer (KYC) obligations, fraud prevention measures, and applicable regulatory requirements. Where necessary, the Company may request additional verification information before processing or approving a withdrawal request.

All financial transactions, including deposits, wagers, winnings, bonuses, adjustments, refunds, and withdrawals, are recorded and maintained within the Company's systems to support accurate record-keeping, auditability, dispute resolution, and compliance with applicable regulatory requirements.

2.3. Software and outcome-determining elements

The Company operates as a licensed B2C online gaming operator and provides players with access to gaming products delivered by licensed and regulated third-party gaming providers. Game outcomes are determined solely by the relevant gaming software and the underlying gaming systems operated by the approved providers. The Company does not modify, influence, manipulate, or interfere with game outcomes, payout calculations, Random Number Generator (RNG) processes, jackpot activation mechanisms, sporting event results, or any other systems or processes responsible for determining outcomes.

Depending on the type and characteristics of the gaming product, outcomes may be generated through the following mechanisms:

- ✓ Certified Random Number Generator (RNG) systems;
- ✓ Progressive jackpot systems;
- ✓ Live gaming platforms and live dealer solutions;
- ✓ Sporting event results and betting settlement mechanisms;
- ✓ Other approved technologies for outcome generation implemented by licensed gaming providers.

The Platform integrates gaming software solutions supplied by established third-party providers that maintain the applicable licenses, certifications, approvals, and regulatory permissions required for their operations in relevant jurisdictions. Where required or applicable, gaming platforms and systems are subject to independent review, testing, and certification by recognized testing entities to ensure that the games operate fairly, transparently, and in accordance with accepted industry standards.

The Company operates secure technical connections with gaming providers to enable the transfer and processing of player bets, game-related requests, results, settlement information, and other associated transaction data. All gaming activities and related transactions are automatically captured and maintained in the Company's systems to

support operational records, compliance monitoring, regulatory obligations, audits, and the handling of potential disputes.

The platform maintains comprehensive controls to ensure the integrity of gaming operations, including:

- ✓ User access control and authentication mechanisms;
- ✓ Secure communication channels with encrypted data transmission;
- ✓ Ongoing monitoring of gaming-related transactions;
- ✓ Automated logging of transactions and maintenance of audit trails;
- ✓ Incident response and security monitoring procedures;
- ✓ Backup solutions, disaster recovery, and business continuity arrangements.

Game rules, wagering limits, payout configurations, RTP (Return to Player) disclosures where applicable, and jackpot parameters are established by the relevant gaming providers and are displayed to players through the gaming interface or other designated informational areas of the Platform.

The Company applies due diligence procedures and maintains ongoing oversight of its gaming suppliers to ensure that all integrated gaming content continues to meet applicable regulatory, licensing, responsible gaming, anti-money laundering, and technical compliance requirements.

3. Quality monitoring and testing

3.1. RNG certification and testing by accredited testing laboratories (ATLs)

The Company provides gaming content exclusively from approved gaming providers whose games and Random Number Generator (RNG) systems have undergone independent testing and certification by recognized Accredited Testing Laboratories (ATLs), including but not limited to Gaming Laboratories International (GLI), iTech Labs, eCOGRA, BMM Testlabs, or other duly recognized certification authorities.

3.2. Periodic vulnerability and penetration testing

The Company applies continuous security monitoring and testing measures to protect its systems, infrastructure, and player data.

Vulnerability assessments and penetration testing are carried out on a periodic basis by qualified internal personnel or independent external security specialists. These activities are intended to detect, assess, and remediate potential security vulnerabilities across the Company's information systems, networks, applications, and related infrastructure.

All identified vulnerabilities are recorded, subject to risk evaluation, and resolved in accordance with the Company's information security and incident management procedures.

4. Data protection and storage

The Company has established a Privacy Policy that governs the handling of personal data, including the types of data collected, processing purposes, rights of data subjects, retention periods, cross-border data transfers, cookie usage, and other applicable data protection requirements.

The Privacy Policy is published on the Company's websites and is incorporated into its broader data protection framework. It is subject to periodic review and revision by the Company to ensure continued alignment with applicable legal, regulatory, and operational standards.

4.1. Data protection

The Company implements appropriate measures to ensure the protection of personal and operational data, including its confidentiality, integrity, and availability during processing activities.

Personal data is processed solely for defined business and regulatory purposes, such as account administration, identity verification, payment processing, responsible gaming controls, anti-money laundering compliance, fraud prevention, customer support services, and regulatory reporting obligations.

Access to personal data is limited to duly authorized personnel strictly on a need-to-know basis and is managed through role-based access control systems. All employees and third-party service providers with access to confidential information are required to comply with binding confidentiality and data protection obligations.

The Company implements technical and organizational security measures designed to protect information against unauthorized access, disclosure, alteration, loss, misuse, or destruction. Such measures include, where appropriate:

- ✓ Secure authentication and access controls;
- ✓ Encryption of data during transmission;
- ✓ Network and infrastructure security controls;
- ✓ System monitoring and logging;
- ✓ Regular security reviews and vulnerability assessments;
- ✓ Incident management and response procedures.

4.2. Data storage and retention

The Company keeps and manages secure electronic records related to customer accounts, gaming activity, financial transactions, KYC documentation, AML records, and operational logs.

These records are held on secure infrastructure managed by the Company and/or authorized third-party service providers. Appropriate technical and organizational

measures are in place to safeguard data integrity and availability, as well as to prevent unauthorized access.

Customer and transaction data is retained in line with all applicable legal, regulatory, anti-money laundering, and licensing obligations. Where no longer retention period is imposed by applicable law or competent regulatory authorities, customer identification data and transaction records are stored for a minimum of five (5) years from the termination of the business relationship or completion of the relevant transaction.

Once the relevant retention period has lapsed, the data is securely removed, anonymized, or transferred to archival storage, in accordance with the Company's internal retention framework and applicable legal requirements.

4.3. Data breach and incident management

The Company maintains procedures for identifying, investigating, managing, and documenting information security incidents and potential data breaches.

Where required by applicable laws or regulatory obligations, relevant authorities and affected individuals will be notified within the prescribed timeframes. Corrective actions are implemented to mitigate risks and prevent recurrence of similar incidents.

5. Visual interface specifications

5.1. Website UI/UX standards mandatory CGA trust seals

The website interface integrates all required compliance and player protection elements, including the official Curaçao Gaming Authority (CGA) seal, mandatory age restriction notices ("18+ Only"), and direct access links to the Responsible Gaming Policy.

5.2. Persistent In-Game session and balance indicators

During active game sessions, the graphical user interface ensures complete informational disclosure, maintaining real-time visibility over the player's active currency balance, active bonus configurations, and total elapsed session time clocks.

6. Access control and banned persons exclusion

6.1. GeoIP geolocation blocks and restricted jurisdictions

The Company employs a range of technical and compliance controls designed to restrict access from jurisdictions where the provision of services is prohibited, limited, sanctioned, or otherwise unavailable. These controls include geolocation systems, IP address analysis, device-based identification tools, payment method screening, Know Your Customer (KYC) procedures, and ongoing risk monitoring mechanisms.

Location verification is carried out using GeoIP technology and additional positioning tools at key stages of user interaction, including registration, account login, and gameplay sessions. Where a user is determined to be located in, accessing from, or otherwise associated with a restricted jurisdiction, the Company may restrict, block, or suspend access to the Platform in accordance with applicable regulatory and compliance requirements.

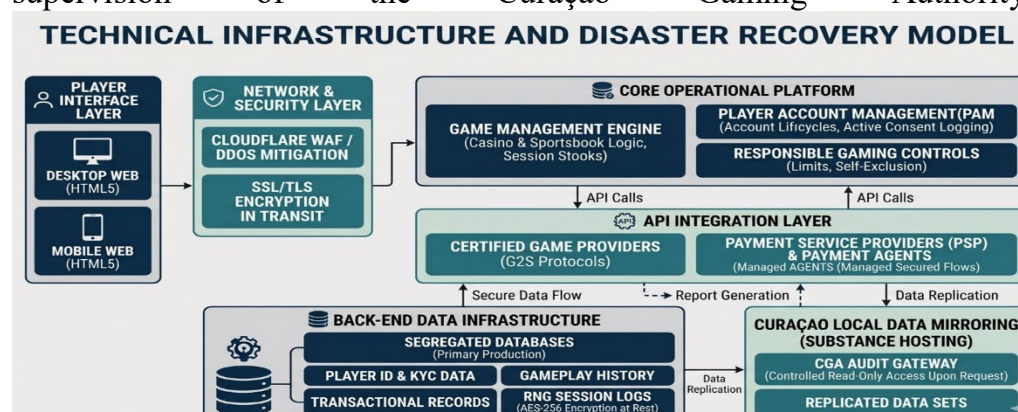
To ensure compliance with applicable licensing, AML, sanctions, and regulatory obligations, the Company applies customer verification and due diligence processes aimed at determining the customer's country of residence, in addition to geolocation-based controls.

Access to the Platform is governed by an internal restricted and prohibited jurisdiction framework developed in line with applicable legal and regulatory requirements, licensing obligations, sanctions regimes, and internal risk assessment criteria. This framework is subject to ongoing review and updates as required.

Registration, deposits, wagering activity, and access to the Company's gaming services are not permitted for customers located in jurisdictions classified as prohibited. Any attempt to bypass or conceal geographical or identity-related restrictions through VPNs, proxies, anonymization tools, false information, or similar techniques may result in suspension or termination of the account, forfeiture of funds or winnings where permitted by applicable law, and any additional measures deemed necessary for regulatory compliance purposes.

7. Technical infrastructure and disaster recovery

This section outlines the technical infrastructure, data handling, compliance controls, and disaster recovery systems implemented by the Company to satisfy the requirements of Article 5.9 of the National Ordinance on Games of Chance (LOK) under the supervision of the Curaçao Gaming Authority (CGA).



7.1 Technical Infrastructure and System Architecture

The Company operates a controlled, auditable, and resilient technical infrastructure designed to ensure continuous availability of gaming services and alignment with regulatory mandates.

The technical infrastructure is deployed in a modular environment consisting of the following core functional components, as visually mapped in the production model:

- **Player Interface Layer:** Desktop and Mobile Web (HTML5) interfaces providing secure end-user access.
- **Network & Security Layer:** Protected environment utilizing Cloudflare WAF and DDoS mitigation to ensure network availability and secure SSL/TLS data encryption in transit.
- **Core Operational Platform:** Comprising the central Game Management Engine (managing casino and sportsbook logic and session states), the Player Account Management (PAM) system (account lifecycles and active consent logging), and integrated Responsible Gaming controls.
- **API Integration Layer:** Secure environment executing certified G2S (Game-to-System) and REST API protocols for data exchange with certified Game Providers and integrated Payment Service Providers (PSPs) / Payment Agents.
- **Back-end Data Infrastructure:** Comprising primary segregated databases storing encrypted player identity, KYC documentation, transactional records, gameplay history, and RNG session logs.

The production, staging, and development environments are strictly segregated. This architecture model is maintained as a standalone annex to this Operations Manual and is updated upon material changes to the system architecture.

7.2 Games of Chance, Payments, Software, and Outcome Determination

The Company offers Games of Chance through licensed and certified software providers integrated into the platform.

The outcome of all Games of Chance is determined through certified Random Number Generator (RNG) systems audited by independent testing laboratories (ITLs) approved by the CGA.

The platform supports integrated payment methods, including electronic payment systems, bank transfers, and alternative digital payment methods managed via authorized payment agents. Betting limits, payout structures, and specific game rules are defined at the game level and are governed by the controlled technical configuration of the platform and contractual arrangements with game providers.

7.3 Disaster Recovery and Technical Emergency Restoration

In the event of material incidents affecting the availability of the platform, the Company may, where applicable and in accordance with applicable regulatory requirements, notify the relevant supervisory authority through the designated communication channels, including the CGA online portal.

Disaster Recovery procedures are subject to periodic testing as part of the Company's internal control framework. Test activities may be documented, and results may be retained for internal governance and audit purposes.

8. Responsible gaming policy

The Company operates a Responsible Gaming Policy in accordance with applicable regulatory requirements, which forms an integral component of its wider compliance framework. This policy has been included in the Company's licensing and regulatory submission package and provided to the Curaçao Gaming Authority (CGA) as part of the relevant authorization process. An overview of the principal responsible gaming measures implemented by the Company is set out below:

8.1. Underage gambling prevention (Zero Tolerance)

Age Restriction: Participation in gambling activities is strictly prohibited for individuals under the age of 18.

Identity and Age Verification: During the registration process, the Company verifies customer identity and age through valid identification documents, including national ID cards, passports, or driving licenses. Where applicable, additional verification tools such as automated systems, artificial intelligence solutions, or third-party data sources may also be utilized..

Action Protocol: In cases where a player is identified as underage, the Company will promptly suspend and permanently close the relevant account. Any winnings will be forfeited automatically. Deposited funds shall be refunded within two (2) business days, unless subject to a freeze due to ongoing AML or fraud investigations. A comprehensive report of the incident shall be submitted to the relevant regulatory authority within five (5) working days..

8.2. Player protection tools and limits

The Platform provides players with direct access to automated responsible gaming tools designed to manage their activity levels. Customer support personnel are required to be familiar with the functionality of these controls and their operational rules:

- ✓ **Deposit Limits:** layers may set maximum deposit thresholds on a daily, weekly, or monthly basis..

- ✓ Wagering Limits: Players can define maximum betting amounts within a selected time period. This restriction does not apply to sports betting products.
- ✓ Loss Limits: Players may set a cap on total losses over a defined period. Once the limit is reached, further play is automatically restricted until the relevant period resets. This feature is not applicable to sports betting.
- ✓ Session Time Limits: Caps on the duration of a single gaming session to ensure regular breaks. This tool does not apply to sports betting.
- ✓ Limit Changes: Any request to decrease a limit must take effect immediately. Any request to increase or remove a limit is subject to a mandatory 7-day waiting period.

8.3. Cooling-Off and Self-Exclusion

- ✓ Cooling-Off (Short-Term Break): Players may initiate a short-term cooling-off period for 1 day, 3 days, 1 week, 1 month, 3 months, or 6 months. The activation of this measure is immediate and does not require approval. During this period, access to deposits, gameplay, and marketing communications is fully restricted.
- ✓ Self-Exclusion (Long-Term/Permanent): Players can voluntarily block themselves for 1 year, 3 years, or permanently. This block applies across all brands and domains operated by the Company, covering both casino and sports betting. Support must ensure that all duplicate accounts and known payment methods are blocked to prevent circumvention.
- ✓ Breach Protocol: If a self-excluded individual is found to have regained access to the Platform, the account is immediately suspended, any deposited funds are refunded within two (2) business days, and the incident is reported to the relevant authority within five (5) working days.
- ✓ Reactivation: Reactivation is only permitted after the full expiry of the applicable self-exclusion period. The player must submit a formal written request, acknowledge responsible gaming warnings, and complete a mandatory self-assessment questionnaire prior to reinstatement.

8.4. Behavior monitoring and chat assessment

The Company utilizes behavioral tracking to spot early warning signs of problem gambling. If a support agent detects concerning verbal triggers or distress during a chat session, they must ask the player the evaluation questions:

- ✓ Have you ever gambled to get money to pay debts?
- ✓ Has your gambling made you careless about the welfare of yourself or your family?
- ✓ Have you ever borrowed money or sold anything to gamble?
- ✓ Has your gambling ever caused you any health problems?
- ✓ Have you ever felt extremely guilty after finishing a gambling session?

- ✓ Have you ever felt you might have a problem with gambling?

Based on the player's answers, the agent must guide them toward available platform tools or direct them to professional support organizations.

8.5. Marketing restrictions and data audit

- ✓ Prohibited Practices: Promotional content shall not contain any misleading representations regarding winning probabilities, shall not present gambling as a means of generating income or resolving financial difficulties, and must not be directed at self-excluded individuals or persons identified as financially vulnerable. In addition, high-risk casino products shall not be promoted to individuals under the age of 25.
- ✓ Data Retention: For regulatory audit and compliance purposes, comprehensive records relating to exclusions, age verification processes, and customer support interventions shall be securely maintained for a minimum period of seven (7) years.

9. General terms and conditions

The Company applies Terms and Conditions that regulate access to and use of its websites and gaming services, establishing the contractual relationship with customers. These terms cover key operational areas such as eligibility criteria, account setup, financial transactions (including deposits and withdrawals), bonuses and promotional mechanics, responsible gaming obligations, restricted activities, account suspension or termination, and procedures for handling disputes.

Access to gaming services is conditional upon customer acceptance of the Terms and Conditions, which are made available on each licensed website operated by the Company and must be agreed to during the registration process.

The Terms and Conditions are subject to periodic review and may be amended to reflect updates in services, operational requirements, or changes in applicable legal and regulatory frameworks. The most recent version is continuously published and accessible on the relevant website.

Acceptance of the Terms and Conditions creates a legally binding agreement between the Company and the customer.

10. Player dispute resolution framework

The Company operates a Player Complaints and Dispute Resolution Policy that defines the procedures for receiving, processing, investigating, and resolving customer complaints and disputes.

This policy is incorporated into the Company's overall compliance framework and has been submitted to the Curaçao Gaming Authority (CGA) as part of the Company's licensing and regulatory documentation package.

10.1. Introduction and regulatory framework

This section sets out the procedures applied by Galaktika N.V. (the "Company") for the receipt, handling, and resolution of player complaints. The framework has been established in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

The rules described herein are applicable to all complaints submitted by players in relation to their engagement with the Company and any aspect of participation in the offered games of chance.

10.2. Definition of a complaint (Incident)

A complaint (incident) is understood as any occurrence, action, omission, or system-related behavior that, from the player's perspective, is considered to have adversely affected their participation in games of chance or their interaction with the Company.

The grounds for submitting a formal complaint may include, without limitation:

- ✓ Issues with deposits, withdrawals, or transaction failures;
- ✓ Disputes over bonuses, specific game results, or bet settlements;
- ✓ Account suspensions, closures, or administrative restrictions;
- ✓ Technical errors, performance drops, or platform bugs.

10.3. Procedure for complaints (Incidents) and operational timelines

1. **Submission Channels:** Players may submit complaints completely free of charge. Formal complaints can be submitted through the following integrated communication channels:
 - Live Chat: Interactive chat assistance available 24/7 directly on the website.
 - Email: Direct submission to the Customer Support team.
2. **Acknowledgement of a Complaint:** Receipt of a complaint is confirmed immediately upon submission. Each complaint is automatically assigned a unique reference number, which is provided to the player for tracking purposes.
3. **Resolution and Decision Timelines:**
 - ✓ **First Response:** The Company issues an initial substantive reply or status update within seventy-two (72) hours from the moment the complaint is formally submitted.
 - ✓ **Final Decision:** A definitive final decision is made and officially communicated to the player within 10 business days from the initial submission.

- ✓ Technical Extensions: In exceptional circumstances where the complaint requires further examination-such as cases involving external service providers or detailed technical or financial audits-the Company may prolong the resolution period for an additional period of up to four (4) weeks. Such extension shall only be applied after the player has been informed in writing in advance. The concluding response will either set out the full reasoning behind the decision and its outcome or provide a substantiated explanation for the rejection of the complaint.
- 4. Responsible Gaming Complaints: Responsible Gaming complaints are handled with the highest operational priority. The Company ensures the most timely and specialized resolution of such complaints in strict accordance with corporate responsible gambling practices.

10.4. Alternative Dispute Resolution (ADR)

Where a complaint remains unresolved to the player's satisfaction following completion of the internal complaint handling process, the matter may be referred to a certified alternative dispute resolution (ADR) body. The Company undertakes to enter into formal arrangements with certified ADR entities once the official register of approved providers becomes available. Access to ADR services is provided to players at no cost. Relevant ADR contact information is set out in the General Terms and Conditions and is also clearly published on the Company's website.

10.5. Escalation to the Curaçao Gaming Authority (CGA)

Players who consider that the Company has failed to comply with its explicit regulatory obligations under the LOK framework may submit a report through the Curaçao Gaming Authority's (CGA) official online reporting form. The Company recognizes that the CGA serves as a supervisory authority and does not adjudicate or resolve disputes relating to individual gambling transactions or player-specific outcomes.

10.6. Record-Keeping and Bi-Annual Regulatory Reporting

Data Retention: All complaints, communication histories, log exports, and internal summaries are logged and securely stored by the Company for a minimum period of 5 years.

Bi-Annual Reporting Obligations: Comprehensive compliance reports are compiled and submitted by the Company twice annually (strictly on January 15 and June 15) to the CGA, containing:

1. The total number of complaints made during the reporting period;
2. The total number of complaints closed (subdivided into settled and rejected cases);

3. The exact number of pending or unresolved complaints;
4. The distribution of complaints sorted by core operational categories;
5. The number of disputes referred to ADR bodies along with the subsequent outcomes of each;
6. The exact number and details of complaints for which a player has taken external legal action against the licensee.

11. Digital record and local server

In accordance with Article 5.1 of the National Ordinance, Galaktika N.V. operates a secure continuous data replication mechanism that synchronizes essential cloud-based data assets with a local physical technical storage environment.

The local technical deployment is hosted inside a Tier-IV certified data center physically operating in Curaçao. The replicated data structure inside the local vault encompasses critical player master data (Sumsb KYC logs), gaming audit trails (every individual bet, transaction timestamp, and RNG outcome), and complete financial ledgers (deposits, cash-out executions, and transaction hashes). This architecture enables the Curaçao Gaming Authority (CGA) to maintain real-time read-only access for the purposes of monitoring and verifying ongoing regulatory compliance.