

OPERATIONS MANUAL

MintDice.com

Operated by Prism Sentinel N.V.

Licensed and Regulated by the Curaçao Gaming Authority (CGA) Company Details
Prism Sentinel N.V.

Company Registration Number: 146440 (0)

Registered Address: 17 Chuchubiweg, Willemstad, Curaçao

License Information: Operates under CGA

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Version: 1.0 (or subsequent updates as required)

Purpose: This Operations Manual accurately describes how MintDice.com operates in practice. It forms a core component of the CGA's ongoing supervisory framework under Article 5.9 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen – LOK). It enables the Authority to assess the adequacy of operational, technical, compliance, and responsible gaming controls. This document is comprehensive, detailed, and tailored specifically to the operations of Prism Sentinel N.V. trading as MintDice. It is submitted as-is for regulatory review and will be updated periodically to reflect any material changes in operations, technology, or regulatory requirements.

1. Description of the Gaming Products and Services Offered

MintDice.com is a fully featured cryptocurrency-focused online gaming platform specializing in Bitcoin and other digital asset wagering. It emphasizes 100% provably fair games, low house edges, games of skill, and a seamless anonymous or verified player experience. The platform operates exclusively with cryptocurrencies, promoting speed, privacy, and transparency through cryptographic verification mechanisms. Core Gaming Products and Services:

- Dice (Bitcoin Dice / Originals): The flagship game. Players select custom odds (e.g., roll under or over a chosen number between 0 and 99.99). Features advanced options, instant results, and the lowest house edge on the platform. Highly customizable betting strategy.
- Bit.Rocket (Crash Game): A unique PvP (player-versus-player) cryptocurrency crash game of skill. Players cash out before the rocket "crashes." Social and competitive elements with unlimited win potential in theory. 100% provably fair.
- Plinko: Immersive 3D Plinko experience with risk levels, color variations, and a special dice bonus mechanic (e.g., rolling a 6 doubles the win in certain configurations). Multiple risk/reward tiers for varied player preferences.
- Casino Games Suite: Includes slots, table games (blackjack, roulette, craps, video

poker, poker), lottery-style games, and additional titles. Some are MintDice originals or integrated provider content; not all are provably fair (standard RNG applies where applicable).

- Sportsbook: Fully featured sports betting platform allowing wagers on major sports, teams, and events in supported cryptocurrencies. Includes pre-match and in-play betting with sport-specific settlement rules.
- Additional Features: Crypto faucet for free play/testing (periodic claims), casino house bankroll investment program (players stake supported cryptos to earn yield from platform house edge/profits), affiliate/referral program, and live activity feeds ("See Who's Winning" real-time table showing recent bets, outcomes, payouts, etc.).

Betting Options:

Extensive customization, especially in Dice (choose-your-own multiplier/odds). Crash and Plinko offer risk tiers and auto-cashout or manual options. Sportsbook covers diverse markets. High betting limits overall, with potential for significant wins (platform highlights capability for wins exceeding substantial thresholds in rapid succession, subject to individual game parameters and account balances).

Payment Methods:

Exclusively cryptocurrency-based for deposits and withdrawals. Supported coins include Bitcoin (BTC), Ethereum (ETH), Litecoin (LTC), and a variety of other altcoins as economically viable and listed on the platform at any given time. Deposits are processed via wallet addresses or integrated gateways. Withdrawals are fast, with VIP players often enjoying near-instant processing. Cold storage is utilized for security of player and house funds. No fiat or traditional banking integration for core operations.

- Bet Limits and Payouts: High maximum limits aligned with platform capacity and risk management (specific per-game maxima displayed in-game; platform notes potential for very large single-second win opportunities under optimal conditions).
- Withdrawal limits per Terms (e.g., daily/periodic caps in crypto equivalent, with higher amounts subject to approval and possible installment payouts for large wins).
- Payouts: Credited immediately upon game resolution for most originals. High RTP and low house edge emphasized (Dice particularly competitive). All winnings paid in the cryptocurrency wagered or platform-supported equivalents. Bonuses/promotions (if offered) subject to separate wagering requirements.
- Minimum bets: Low entry points suitable for broad accessibility, especially with faucet support.

Software Used and Outcome-Determining Elements:

The platform runs on a custom-developed, modern web-based architecture optimized for cryptocurrency integration and mobile responsiveness. Core games (Dice, Plinko, Bit.Rocket) utilize proprietary provably fair technology. Provably Fair Mechanism (detailed for transparency and CGA compliance):

- Server Seed: Generated and hashed (typically SHA-256) by the platform and displayed to the player before betting commences. The actual seed remains secret until after the round.
- Client Seed: Player-controlled (default auto-generated or customizable by the user; must not repeat prior values in some contexts).
- Nonce: Increments with each bet using the same seed pair.
- Outcome Generation: Combination via cryptographic hash function (commonly HMAC-

SHA512 or equivalent of server seed + client seed + nonce). The resulting hash is processed (e.g., taking portions of the hex string, modulo operations) to produce a deterministic outcome (e.g., 0–99.99 for Dice rolls; crash multiplier or Plinko path for other games).

- Verification: After the round, the server seed is revealed. Players can independently recompute the outcome using open-source verifiers or in-game tools (MintDice provides JSFiddle-style repositories for Dice, Plinko, and Bit.Rocket for public verification). This ensures the house cannot alter results post-bet.
- Non-provably fair games (certain slots/table games in the suite) rely on certified or audited RNG systems from reputable providers, with equivalent fairness guarantees.

All outcomes are deterministic, transparent, and auditable. The system prevents house manipulation while maintaining the mathematical house edge. This product suite is designed for recreational play, skill expression where applicable, and high transparency in a cryptocurrency-native environment.

2. Description of the Testing and Quality Monitoring Procedures Applied to the Operation

Prism Sentinel N.V. maintains rigorous, multi-layered testing and quality assurance protocols to ensure platform reliability, game fairness, security, and regulatory compliance. These procedures are integral to daily operations and CGA oversight. Internal Testing and Quality Assurance:

- Development Lifecycle: Agile methodologies with continuous integration/continuous deployment (CI/CD). All code changes undergo peer review, automated unit/integration testing, and staging environment validation before production deployment.
- Game-Specific Testing: Provably fair algorithms undergo extensive mathematical verification, edge-case simulation (extreme bets, high volume), and reproducibility testing. Third-party or internal cryptographic audits confirm hash integrity and outcome distribution aligns with expected probabilities.
- End-to-End Testing: Full user journey simulations (registration, deposit, gameplay across all products, withdrawal, complaint submission). Performance testing under load (simulated high concurrency).
- Security Testing: Regular penetration testing, vulnerability scans (OWASP standards), code reviews for injection/XSS/CSRF risks, and smart contract/wallet security audits where applicable.
- Compliance Testing: Automated and manual checks against prohibited jurisdiction lists, age gates, self-exclusion enforcement, and AML flagging rules.

Quality Monitoring Procedures:

- Real-Time Monitoring: 24/7 system health dashboards tracking uptime, latency, transaction throughput, error rates, and game outcome distributions. Alerts for anomalies (e.g., unusual win streaks triggering manual review).
- Performance Metrics: Uptime targets exceeding 99.5%, with automated failover. Game fairness metrics (RTP tracking per game, deviation alerts).
- Player Feedback Integration: Support tickets, live chat logs, and complaint data analyzed for systemic issues. “See Who’s Winning” live feed and player reports feed into quality loops.

- Third-Party Audits and Reviews: Periodic external reviews of provably fair implementations, RNG (where applicable), and overall platform security. Alignment with emerging CGA technical standards.
- Incident Management: Formal ticketing system for bugs/issues. Root-cause analysis, corrective actions, and post-mortem documentation. Changes logged with version control.
- Continuous Improvement: Regular platform updates based on monitoring data, player input, technological advancements (e.g., enhanced 3D rendering, new crypto integrations), and regulatory guidance. Annual or ad-hoc reviews of the entire quality framework.

These procedures ensure the operation remains robust, fair, and responsive, directly supporting CGA supervisory objectives.

3. Details of How Player Personal Data and Other Information Are Stored and Protected

Player data handling adheres strictly to the Privacy Policy, AML/KYC Policy, and applicable Curaçao and international standards (including data protection principles aligned with LOK requirements). Data Collected:

- Personal: Name, date of birth, address, email, phone, nationality, gender (for KYC tiers).
- Transactional: Deposit/withdrawal history, bet logs, balances.
- Technical: IP address, device/browser information, usage patterns, cookies (session, persistent, analytical).
- Verification: ID documents, proof of address, source of wealth/funds (higher tiers), handwritten notes/photos for ID validation.

Storage:

- Primary storage on secure servers (including locations in Germany and other jurisdictions as operationally required).
- Encrypted at rest and in transit (SSL/TLS with strong encryption standards, e.g., 128-bit+).
- Databases protected by state-of-the-art firewalls, access controls, and segmentation.
- Redundant storage with backups (detailed in infrastructure section).

Protection Measures:

- Role-based access control (RBAC) with least-privilege principles; audit logging of all access.
- Encryption for sensitive fields (KYC documents, financial data).
- Regular security assessments and penetration testing.
- Third-party processors/contractors bound by equivalent security and confidentiality agreements.
- Data minimization: Only collect what is necessary; anonymization where possible for analytics/research.
- Retention: Identification and transaction records retained for a minimum of 7 years (per AML requirements) or longer as mandated by law/CGA. Player activity logs and bet records maintained for auditability (typically 5+ years).

- International transfers: Conducted with appropriate safeguards; player consent obtained via Terms.
- Breach response: Incident response plan with notification protocols aligned with regulatory expectations.

Players have rights to access, correction, and (where applicable) deletion, subject to legal retention obligations. Data is never sold; sharing is limited to service provision, legal requirements, or fraud/AML prevention. This framework ensures robust protection while enabling necessary compliance and operational functionality.

4. A Description of the Player-Facing Visual Elements and Interfaces Used Within the Platform

The MintDice platform features a modern, sleek, cryptocurrency-themed user interface designed for intuitiveness, engagement, and accessibility across desktop and mobile devices. Overall Aesthetic and Layout:

- Dark mode with vibrant accents (neon greens, blues, golds typical of crypto aesthetics).
- Clean, minimalist navigation: Prominent game categories (Dice, Plinko, Bit.Rocket, Casino Suite, Sportsbook), balance/wallet panel, deposit/withdrawal shortcuts, live stats feed, and quick-access tools (faucet, affiliate, investment).
- Responsive design: Fluid adaptation from desktop to mobile browsers/apps.

Key Player-Facing Elements:

- Game Lobbies and Interfaces: Dedicated pages or modals for each game. Dice: Simple bet panel with odds slider, auto-bet options, provably fair seed display/verifier button. Plinko: Stunning 3D board with animated pegs/balls, risk selectors, color themes, and bonus indicators. Bit.Rocket: Dynamic rocket ascent animation with cash-out slider/button, PvP/social elements, multiplier tracking.
- Live Activity and Transparency: Prominent “See Who’s Winning” real-time table (columns: Game, Outcome, User (anonymized or username), Time, Bet, Detail, Event, Payout, Profit). Builds trust and excitement.
- Account and Wallet Section: Balance display (multi-crypto support), transaction history, KYC status indicators, self-exclusion/limit-setting tools.
- Deposit/Withdrawal Flows: Streamlined crypto address generation or QR codes, confirmation screens, status tracking.
- Promotional/Engagement Elements: Faucet claim interface, investment staking dashboard (yield projections), affiliate referral links/tracking.
- Responsible Gaming Integration: Accessible links/tools for limits, self-exclusion, reality checks, and help resources (non-intrusive but prominent where relevant).
- Support: Live chat integration, FAQ/searchable knowledge base, ticket submission.
- Visual Fidelity: High-quality animations, particle effects (Plinko), smooth transitions. Provably fair indicators (seed hashes, verifier links) displayed transparently in-game.

The interface prioritizes clarity, speed, and immersion while embedding compliance elements (age gates on entry, prohibited jurisdiction warnings where applicable).

5. The Technical and Operational Measures Implemented to Prevent Access by Prohibited or Restricted Persons

Robust controls prevent access by minors, residents of prohibited jurisdictions, self-excluded individuals, and high-risk or sanctioned persons, in full compliance with CGA requirements and the National Ordinance. Key Measures:

- **Geographic Restrictions:** IP geolocation blocking for prohibited countries/jurisdictions (explicitly: Aruba, Australia, Bonaire, Curaçao, France, Iran, Iraq, Netherlands, Saba, Spain, St. Maarten, Statia, United States and dependencies, United Kingdom, plus any additional jurisdictions at operator discretion or per regulatory updates). High-risk FATF-listed jurisdictions are fully banned.
- **Age Verification:** Mandatory declaration of being 18+ (or higher local age) upon registration. Enhanced KYC (government ID, proof of address, photo with handwritten note/random number) triggered for withdrawals or higher activity tiers. Electronic verification cross-checks; manual review for discrepancies.
- **Self-Exclusion Program:** Players can request temporary or permanent self-exclusion via support or dedicated form. Enforced technically (account restrictions, login blocks) and monitored. Cooling-off periods available. Reality checks and session/time limits player-configurable.
- **Multi-Account and Fraud Prevention:** Strict one-account-per-person/household/IP/device policy. Device fingerprinting, IP/device linking detection, behavioral analytics. Duplicate accounts result in closure, bet voiding, and forfeiture.
- **AML/KYC Tiered Verification:** Risk-based approach (low/medium/high by jurisdiction and activity). Step-wise verification thresholds (e.g., basic details pre-withdrawal; enhanced ID/source of wealth for higher amounts). AI-assisted transaction monitoring with human oversight for suspicious patterns.
- **Additional Technical Controls:** VPN/proxy/tor detection where feasible; CAPTCHA or behavioral challenges on suspicious activity; real-time screening against watchlists.
- **Operational Procedures:** Staff training on identification and escalation. Manual reviews for edge cases. Immediate account suspension for violations. Reporting of serious breaches to CGA/authorities as required.

These layered controls (technical + procedural) effectively restrict access while minimizing false positives for legitimate players.

6. Diagram of the Technical Infrastructure, Including Hosting Arrangements, Platform Architecture, Backup Systems, Disaster Recovery Measures, and Business Continuity Procedure.

7. Textual Diagram and Description (High-Level Architecture):

[Player Devices: Web Browser / Mobile]

↓ (HTTPS/TLS)

[CDN + DDoS Protection / WAF (e.g., Cloudflare or equivalent)]

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[Load Balancers / API Gateway]

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[Application Layer]

- Frontend Servers (React/Vue or equivalent, responsive UI)
- Game Engines (Dice/Plinko/Bit.Rocket logic + Provably Fair module)
- Backend APIs (account, wallet, sportsbook, transactions)
- Real-time Services (WebSockets for live feeds/crash)

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[Provably Fair / RNG Engine] (Cryptographic hash functions, seed management, verifiable)

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[Data Layer]

- Primary Database Cluster (Player profiles, KYC, bet/transaction logs - sharded/replicated)
- Wallet/Crypto Node Integration (Hot wallets for operations; Cold storage majority)
- Logging & Analytics DB

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[Security & Monitoring Layer]

- Firewalls, IDS/IPS, SIEM
- 24/7 Monitoring (uptime, anomalies, performance)
- Alerting & Incident Response

Hosting Arrangements: Scalable cloud or dedicated secure infrastructure in compliant jurisdictions (primary in Europe or equivalent secure locations; redundant capacity). Utilizes leading providers with strong security certifications. Content delivery via global CDN for low latency.

Platform Architecture: Microservices-oriented where beneficial for scalability.

Separation of concerns (frontend, game logic, payments, compliance modules). Provably fair module isolated for auditability. Cryptocurrency wallets with multi-signature and cold storage best practices.

- Backup Systems:**
- Automated daily full + incremental backups of databases, configurations, and critical files.
 - Encrypted backups stored offsite in geographically separate secure locations.
 - Regular restore testing.

Disaster Recovery (DR) Measures:

- Redundant infrastructure across multiple availability zones/regions.
- Automated failover for critical components (target Recovery Time Objective – RTO: minimal downtime, e.g., hours; Recovery Point Objective – RPO: near real-time or hourly).
- Documented DR plan with step-by-step failover procedures, communication protocols, and post-incident review.
- Annual DR testing and tabletop exercises.

Business Continuity Procedures (BCP):

- Comprehensive BCP document covering scenarios (cyber incidents, natural disasters, key personnel unavailability, payment processor issues).

- Defined roles/responsibilities (incident commander, technical leads).
- Communication plans (internal, player notifications via site/status page/email, regulator notification).
- Regular reviews and updates (at least annually or after significant changes).
- Insurance and financial reserves to support continuity.
- Focus on maintaining core player services (game access, withdrawals where feasible) during disruptions.

This infrastructure supports high availability, security, scalability, and rapid recovery, aligning with best practices for online gaming operations under CGA supervision.

7. Details of How Responsible Gaming Principles and Controls Have Been Implemented Within the Operation

Responsible gaming is a foundational principle at MintDice, embedded across product design, operations, and player interactions to promote safe, recreational play and mitigate harm. Implementation Details:

- Access Controls: Strict 18+ age gates with KYC enforcement. Prominent responsible gaming messaging on registration and key pages.
- Player Tools: Self-settable deposit limits, session/time limits, loss limits, and reality check pop-ups (periodic reminders of time/money spent). Easy self-exclusion (temporary/permanent) with technical enforcement and support for reinstatement requests after cooling-off.
- Game Design: Low house edge and provably fair transparency reduce opacity. No misleading mechanics; clear odds/disclosure. Avoidance of aggressive autoplay or dark patterns.
- Education and Resources: Links to responsible gaming information, help organizations (e.g., international problem gambling helplines, local equivalents), and platform-specific guidance. Blog/articles on safe play where relevant.
- Monitoring and Intervention: Behavioral analytics to flag potential problem gambling indicators (rapid deposit patterns, extended sessions, chasing losses). Trained support staff for sensitive handling. Escalation protocols for suspected issues.
- Staff Training: Regular responsible gaming and AML training for all relevant personnel.
- Promotions and Marketing: Responsible advertising; no targeting of vulnerable groups. Bonuses structured to avoid encouraging excessive play.
- Collaboration and Reporting: Cooperation with CGA on responsible gaming initiatives. Tracking and reporting of self-exclusions and related metrics. Integration with broader player protection framework.
- Continuous Evaluation: Regular review of tools' effectiveness via player feedback, complaint data, and industry best practices. Adjustments made proactively.

These controls demonstrate a proactive, player-centric approach fully aligned with CGA expectations and the National Ordinance.

8. The Current Terms and Conditions Applicable to Players

The current Terms of Service (last updated December 2022, with ongoing applicability) govern all player interactions. Key excerpts and provisions (full current version

available at <https://www.mintdice.com/article/terms-of-service>; this manual incorporates them by reference and summary for completeness): Eligibility and Prohibited Jurisdictions: Must be 18+ (or higher local minimum). Prohibited: Aruba, Australia, Bonaire, Curaçao, France, Iran, Iraq, Netherlands, Saba, Spain, St. Maarten, Statia, USA and dependencies, United Kingdom. Operator may refuse service to additional jurisdictions. Account Rules: One account per person/household/IP/device. Accurate information required. No multi-accounting, transfers, or third-party use. 2FA recommended. Betting and Gaming: All bets final once placed. Specific rules for sports (e.g., settlement timing, void conditions). Malfunctions may void bets at operator discretion. Deposits/Withdrawals: Crypto only. KYC required for withdrawals. Limits apply (e.g., daily/periodic maxima; large wins in installments). Wagering requirements for bonuses. Disputes and Governing Law: Governed by laws of Curaçao. Disputes subject to operator's final judgment or applicable arbitration/CGA processes. Prohibited Conduct: Fraud, cheating, collusion, money laundering, VPN misuse for circumvention – results in account closure and forfeiture. Liability and Indemnity: Standard limitations; player responsible for taxes and local legality. Full Terms emphasize fair play, compliance, and player responsibilities. They are binding upon use of the platform and integrate the Player Complaints Policy and other policies.

9. The Procedures Used for Handling Player Complaints and Disputes

Detailed procedures are outlined in the dedicated Player Complaints Policy (Version 1.1, effective June 19, 2025), fully compliant with Article 5.3 LOK and CGA guidelines. Process:

1. Initial Contact: Support via live chat or support@mintdice.com.
2. Formal Complaint: Submit via form/email to complaints@mintdice.com with required details (name, account, description, dates, category e.g., withdrawal, game fairness, responsible gaming).
3. Timelines:
 - Responsible gaming complaints: Written acknowledgment within 2 business days; resolution within 5 business days (extendable).
 - Other complaints: Acknowledgment within 1 week; resolution within 4 weeks (extendable for complexity).
4. Handling: Human-led (AI assists monitoring only). Written final determination with reasons/evidence.
5. Escalation: If unresolved, free access to CGA-certified Alternative Dispute Resolution (ADR) provider (costs covered by MintDice). ADR outcome final.
6. Further Recourse: Legal action possible; CGA oversight for systemic issues (report via cga.cw).
7. Record-Keeping & Reporting: Biannual reports to CGA (complaint volumes, types, outcomes). Records retained 5+ years. CGA may request access.

Complaints cover deposits, withdrawals, bonuses, fairness, data protection, AML, etc. The process is free, accessible, transparent, and player-focused.

10. Details Regarding the Storage and Maintenance of Critical Player and Transaction Records

Critical records include:

- Player registration and KYC documentation.
- Full transaction and bet histories (amounts, timestamps, outcomes, seeds for provably fair verification).
- Financial records, communications, complaints, and compliance logs.
- System logs for audits and incident investigation.

Storage and Maintenance:

- Secure, encrypted databases with replication and redundancy.
- Retention periods: Minimum 5–7 years (or longer per LOK/AML/CGA requirements) from end of relationship or transaction date.
- Access: Role-based, logged, and auditable. Restricted to authorized personnel.
- Backups: Regular automated encrypted backups with offsite storage and tested restore capabilities.
- Integrity: Hashing/checksums where appropriate; regular integrity checks.
- Accessibility: Readily retrievable for CGA requests, internal audits, or legal obligations.
- Security: Protected against unauthorized access, alteration, or loss, consistent with overall data protection framework.

These practices ensure complete audit trails, regulatory compliance, and the ability to resolve disputes or investigate issues effectively.
