

Migration Plan for donbet.com Transition from SANTEDA INTERNATIONAL B.V. to GTW B.V.

1. Project Objective and Goals

The strategic objective of this migration project is to initiate the transition of donbet.com from SANTEDA INTERNATIONAL B.V. (operating under Curaçao Gaming License No. OGL/2024/1798/1048) to GTW B.V. (operating under Curaçao Gaming License No. OGL/2024/250/0115). The migration aims to ensure compliance with regulatory requirements and to enhance operational efficiency under the regulations stipulated Curaçao Gaming Authority (CGA)

Project Plan

The migration will be completed in multiple milestones, with the following key dates:

- the **Transfer Date** - shall be August 21 - 2025.
- the **Cut Off Date** - shall be September 21 – 2025

The Project milestones shall be as follows:

1. Migration Plan Approval. Submit this plan to the Authority by 16-July-2025 (before 18-JULY-2025) and obtain approval.

- Estimated Timeframe: As soon as practicable.
- Expected result: The Migration Plan is approved Curaçao Gaming Authority.

2. Informing the Players and Recording Consent: Notify eligible players regarding the upcoming migration and record the consent of those opting in.

- Start Date - July 21 - 2025.
- Method – Notify via pop-ups, emails.
- Expected result – Record consent from eligible players.

3. Player Data Transfer. Transfer data of players who have provided consent.

- Estimated Timeframe: Complete transfers by **Transfer Date** for those who have consented and continue transferring up to the **Cut-Off Date** as consents are obtained.

4. Player Acceptance. Relaunch the website and onboard players who have accepted the Terms and Conditions (T&Cs) and Privacy Policy.

- Expected result: Onboard players into the transferee' s database.

5. Consent Reporting: Submit a report of players who accepted the transfer to the Authority.

- Estimated Timeframe: On or as soon as possible after the Cut Off Date.
- Expected result: Submit a complete report to the Authority.

2. Eligible Players

The eligibility of players for the migration depends on.

2.1. Account Status

These statuses determine whether a given Player is eligible for the transfer:

- Account is **open** – the Player is **eligible** for the transfer.
- Account is **closed** for any reason, **save for self-exclusion or player protection actions** the Player is **NOT eligible** for the transfer.

2.2. Restricted Jurisdictions

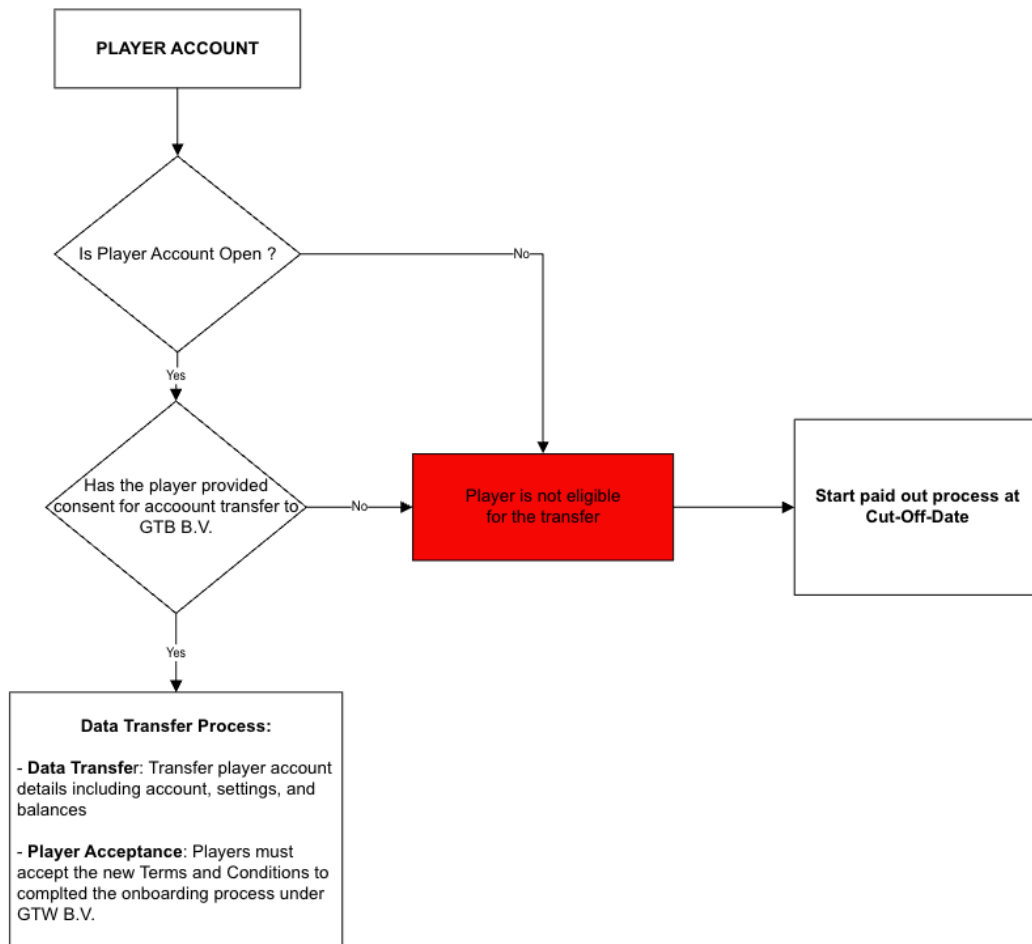
The company has confirmed that both websites already meet the compliance policy related to player restrictions from high-risk jurisdictions, and therefore no additional jurisdictional compliance actions are required during this migration.

2.3. Account restrictions and settings

Player protection limits and marketing communication settings will be retained during migration.

2.4. Summary

The following flowchart summarizes Players' eligibility for the transfer and actions



3. Informing the Players and Recording Consent

3.1. Informing the Players

Inform eligible players via pop-ups and emails

3.2. Pop-Up Notification

Players who will be logging into the Website account within the period starting July 21, 2025 and ending on the day preceding the Transfer Date (inclusive) shall receive a pop-up with information about the upcoming transfer.

3.3. Email notification.

Email shall send email notifications to all Players, within the period starting July 21, 2025 and ending on the day preceding the Cut Off Date (inclusive) which notifications shall:

3.4. Pop-up text for eligible Players

Pop-up header: Important update

Pop-up text:

Dear Players,

We are excited to announce that starting from August 21, 2025, donbet.com will be operating under new management.

Your account will be transferred only if you give your consent by clicking the “Accept” button below. We will ensure a seamless transition of your details, balance, and settings, so you can continue playing as usual with your current username and password.

This migration involves a transfer from Santeda International B.V. to GTW B.V., both operating under the Curaçao Gaming Authority license.

If you do not wish to transfer your account, click “Reject.” In that case, any remaining balance will be automatically refunded on August 21, 2025. (Please note that the actual refund receipt may vary depending on individual banking systems)

3.5. Email message for eligible Players

Email subject: Important update about your account on donbet.com

Email text:

Dear Players,

We are excited to announce that starting from 21-AUG-2025, the donbet.com will be operating under new management.

Your account will be transferred only if you give us your consent by clicking on the "Accept" button below. We will then work on a seamless transition of your details, balances, and settings, ensuring that you will be able to log in with your current username and password and continue playing as usual after the transfer.

To enable this transition, the donbet.com will be transferred from SANTEDA INTERNATIONAL B.V. to GTW B.V., both operating under the Curaçao Gaming Authority (CGA) license

If you do not wish to receive further reminders of the upcoming transfer, please click on the Unsubscribe link below.

4. Data Protection and Player Data Transfer

4.1. Player Data

The Player Data to be transferred as part of the migration shall include the following:

- account and verification details (AccountID, Type, MobilePhoneStatus, ConfirmedAt)
- personal details (FirstName, Gender, DateOfBirth)
- contact details (Email, City, PostalCode, Address1, MobilePhone, Country)
- financial transactions history (deposits and withdrawals, TransactionDate, cTag);
- game transactions history (games played, bets, wins, losses);
- real money balance, bonus money balance, wagering (playthrough) status of the bonus money;
- all documents collected in the course of customer due diligence;
- player protection mechanism limits (if applicable);
- marketing and promotion communications opt-in/opt-out status (ReceivePromos, ReceiveSmsPromos);
- **for accounts closed for player protection purposes** (self-excluded or excluded): full name, e-mail, phone number.

4.2. Technical Measures

Use access segregation to ensure that only employees with a strict need-to-know have access to player data.

6. Summary of Migration

The migration process will involve multiple phases and checkpoints to ensure a secure and seamless transfer of the donbet.com from SANTEDA INTERNATIONAL B.V. to GTW B.V., in full compliance with Curaçao Gaming License requirements.