

Know Your Customer (KYC) Onboarding Policy

Cura Casino B.V

Version 1.0

Date: 1st August 2025

1. Purpose and Scope

This Know Your Customer (KYC) Onboarding Policy outlines the procedures and controls established by Cura Casino B.V. to ensure compliance with the **Curacao Gaming Authority (CGA)** licensing framework. The policy also aligns with best practices for combating **money laundering (ML)** and **terrorist financing (TF)**, and ensures that platform access is restricted to eligible players from approved jurisdictions.

This policy applies to all players who register or interact with our platform.

2. Restricted Jurisdictions

Cura Casino B.V. strictly prohibits access from users in jurisdictions where online gaming is restricted or illegal.

Prohibited Jurisdiction Notice:

Players from the **United Kingdom (UK)** are strictly prohibited from accessing, registering, depositing, or playing on this platform. Any attempt to bypass geo-blocking technologies using **VPNs, proxies, or other methods** will result in the immediate and permanent suspension of the account.

Additional prohibited jurisdictions include, but are not limited to: the United States of America, France, Netherlands, Spain, Curaçao, North Korea, Iran, Syria, Sudan, Belarus, Russia, and any other jurisdiction classified as restricted by Curacao regulations or payment provider policies.

3. KYC Requirements

3.1. Identity Verification

All players must verify their identity upon registration and before any financial transactions. The following documents are required:

- A valid government-issued ID (passport, national ID card, or driver's license).
- A selfie or video verification to confirm liveness and a facial match.

3.2. Proof of Address

Players must submit a recent utility bill, bank statement, or government-issued correspondence dated within the last three months.

3.3. Age Verification

All players must be at least **18 years old** or the minimum legal age in their jurisdiction. Players who are underage or attempt to falsify their age will have their accounts immediately suspended.

3.4. Source of Funds (SoF) / Source of Wealth (SoW)

When deemed necessary based on a player's profile or transactional activity, we may request documents to verify the source of their funds or overall wealth. Acceptable documents include:

- Payslips or employment contracts.
- Bank account statements.
- Inheritance or sale contracts (if applicable).

4. Risk Assessment and Enhanced Due Diligence (EDD)

Players flagged as high-risk—for example, those from certain jurisdictions, with high transaction volumes, or with adverse media mentions—will be subject to **Enhanced Due Diligence (EDD)** measures, which may include:

- Additional verification steps.
- Screening for **Politically Exposed Persons (PEP)** and sanctions.
- Ongoing monitoring of their activity.

5. Geo-Blocking and Access Control

The platform uses geo-location technology and IP detection systems to block access from restricted countries. Any player who attempts to:

- Access the platform from a prohibited jurisdiction.
- Register using falsified information.
- Circumvent geographical restrictions (e.g., via VPN).

...will have their account permanently suspended and may be reported to the appropriate authorities if required.

6. Ongoing Monitoring and Review

KYC records and player activity are monitored on an ongoing basis. Any suspicious behavior will be flagged, and appropriate action will be taken in line with our AML/CFT procedures and CGA reporting obligations.

7. Data Retention and Privacy

All personal and KYC data is processed in accordance with data protection regulations. This data is securely retained for at least **five years** after a player's account is terminated.

8. Policy Enforcement

This KYC Onboarding Policy is enforced without exception. Non-compliance may result in account termination, reporting to authorities, and forfeiture of funds where appropriate.