

Alpha Games N.V.- Responsible Gaming Policy

1. Our Unwavering Commitment to Player Well-being

At Alpha Games N.V. (in further text: “The Company”) we believe that betting and gaming should be a source of entertainment and excitement. We are dedicated to providing a secure and fair platform, but equally important is our commitment to protecting our players and promoting a responsible approach to gambling. Your well-being is paramount, and we see responsible gaming as a shared responsibility between you, our valued player, and us, the operator.

Gambling involves risk and should never be viewed as a way to generate income, recover from debt, or solve financial difficulties. We want you to enjoy your time with us safely and within your means.

This policy details the extensive measures, tools, and support systems we have implemented to foster a safe environment. It is developed in strict accordance with the legal requirements of Curacao and fully adheres to the standards mandated by the Responsible Gaming Policy for Licensed Operators, as overseen by the relevant Curacao regulatory authorities.

2. Defining Responsible Gaming: Playing Smart, Staying Safe

Responsible Gaming is about maintaining control, understanding the risks, and ensuring that gambling remains a positive part of your leisure time. It encompasses:

- **Playing for Fun, Not Funds:** Treating gambling as entertainment, not a job or an escape. The money spent is the cost of that entertainment.
- **Understanding the Odds:** Recognizing that outcomes are determined by chance (or skill in some betting forms) and that losses are a real possibility. Familiarize yourself with game rules and payout structures.
- **Setting Clear Limits:** Proactively deciding *before* you play how much time and money you are comfortable spending, and sticking to those limits regardless of wins or losses.
- **Affordability:** Only gambling with funds, you can genuinely afford to lose – money that isn't needed for essential living expenses like rent, bills, or food.
- **Maintaining Balance:** Ensuring gambling doesn't negatively impact your personal relationships, work or study commitments, or mental and physical health.

- **Knowing When to Stop:** Recognizing signs that you might be losing control and having the awareness to take a break or stop playing altogether.
- **Avoiding Chasing Losses:** Accepting losses as part of the game and resisting the urge to bet more in an attempt to win back lost money. This often leads to bigger losses.
- **Playing Sober and Clear-Headed:** Not gambling when under the influence of alcohol or drugs, or when feeling stressed, depressed, or emotionally vulnerable, as this can impair judgment.

3. Understanding and Recognizing Problem Gambling

While most people gamble responsibly, for some individuals, gambling can evolve from entertainment into a harmful behavior often referred to as problem gambling or gambling addiction. This is a recognized health issue that can affect anyone, regardless of background or willpower. It's often progressive, meaning it can start small and gradually worsen over time.

Key warning signs that gambling may be becoming problematic include:

- **Financial Indicators:**
 - ✓ Spending more money gambling than intended or budgeted.
 - ✓ Experiencing difficulty paying bills due to gambling losses.
 - ✓ Borrowing money (from friends, family, loans, credit cards) to fund gambling.
 - ✓ Selling personal possessions to get gambling money.
 - ✓ Constantly thinking about ways to get money to gamble.
- **Time Indicators:**
 - ✓ Spending increasing amounts of time gambling, thinking about gambling, or planning the next session.
 - ✓ Losing track of time while gambling.
 - ✓ Neglecting work, studies, family, or personal responsibilities due to time spent gambling.
- **Emotional & Behavioral Indicators:**
 - ✓ Feeling restless, irritable, or anxious when trying to cut down or stop gambling.
 - ✓ Lying to family, friends, or colleagues to hide the extent of gambling activities.
 - ✓ "Chasing losses" – trying to win back lost money with more gambling.
 - ✓ Needing to gamble with larger amounts of money to achieve the desired excitement (tolerance).
 - ✓ Using gambling as an escape from problems, stress, anxiety, or depression.
 - ✓ Feeling guilt, shame, or remorse after gambling sessions.

- ✓ Experiencing arguments with loved ones about gambling habits or finances.
- ✓ Committing illegal acts (e.g., fraud, theft) to finance gambling (in severe cases).

The constant accessibility of online gambling (24/7 availability) can sometimes exacerbate these risks for vulnerable individuals. If you recognize several of these signs in yourself, or are concerned about someone else, it is crucial to seek help. Problem gambling is treatable, and recovery is possible with the right support.

4. Proactive Tools and Resources for Your Control

The Company empowers you with a suite of easy-to-use tools designed to help you manage your gambling activity effectively. These are available directly within your player account profile.

4.1 Confidential Self-Assessment:

- ✓ Purpose: These are questionnaires designed to help you reflect honestly on your gambling patterns and assess if they might be becoming risky or problematic. They are based on recognized diagnostic criteria but do not provide a formal diagnosis.
- ✓ How it Works: Answer a series of multiple-choice questions about your gambling behavior and feelings over a specific period (e.g., the last 12 months). Your responses are confidential.
- ✓ Access: We provide links to reputable, anonymous online self-assessment tools:
 - <https://www.gambleaware.org/>
 - <https://www.gamcare.org.uk/>
 - <https://www.responsiblegambling.org/>
- ✓ Recommendation: We encourage all players to take a self-assessment periodically, even if you don't feel you have a problem.

4.2 Setting Financial Limits (Pre-Commitment):

- ✓ Principle: Setting limits before you start playing is a highly effective strategy. It helps prevent impulsive decisions made in the heat of the moment.
- ✓ Types of Limits:
 - **Deposit Limits:** Restrict the total amount of money you can deposit into your account over a set period (Daily, Weekly, Monthly). Once reached, you cannot deposit more until the period resets.

- **Loss Limits:** Restrict the net amount of money you can lose (Total Bets - Total Wins) from your deposited funds over a set period (Daily, Weekly, Monthly). This helps protect your bankroll.
- **Wager/Turnover Limits:** Restrict the total amount of money you can place in bets over a set period (Daily, Weekly, Monthly), regardless of wins or losses.
- ✓ Setting/Adjusting Limits: You can set or change these limits anytime in your Account Settings Section
- ✓ Effectiveness:
 - *Decreasing* a limit (making it stricter) takes effect ***immediately***.
 - *Increasing* a limit (making it less strict) or removing it entirely requires a cooling-off period of 24 hours, 7 days, 1 or 3 months before the change takes effect. This delay is mandatory and designed to give you time to reconsider your decision, preventing impulsive increases. You will need to re-confirm the increase after the cooling-off period.
- ✓ Scope: Unless specified otherwise, these limits typically apply globally across your account (e.g., covering sports betting, casino games, etc.).

4.3 Managing Your Time:

- ✓ Session Time Limits: Set a maximum duration for any single login/playing session (e.g., 1 hour, 2 hours). Once the time limit is reached, you may be automatically logged out or prompted to decide whether to continue – configurable in Account Settings.
- ✓ Reality Check Reminders: Activate automated pop-up messages at predefined intervals (e.g., 30, 60, 90 minutes – configurable in Account Settings. These reminders temporarily pause gameplay and display:
 - Time elapsed since the session started.
 - Your total bets and net win/loss position for the current session.
 - Options to: Continue playing, Exit the game, or view your detailed Account History.
 - You must acknowledge the reality check to continue playing.

4.4 Access to Your Activity History:

- ✓ Transparency: We provide easy access to a comprehensive history of your transactions (deposits, withdrawals) and betting activity (bets placed, outcomes, winnings/losses).
- ✓ Purpose: Regularly reviewing your history helps you keep track of your spending and playing patterns accurately.
- ✓ Access: Find your detailed history in the Account Settings.

4.5 Time-Out / Cool-Off Period (Short Break):

- ✓ Purpose: If you feel you need a temporary break from gambling for any reason, a Time-Out allows you to step away for a defined period.
- ✓ Durations: You can choose from predefined periods such as: 24 hours, 7 days, 30 days, 90 days.
- ✓ Process: Request a Time-Out easily via Account Settings option or by contacting Customer Support. The request is usually processed automatically or very quickly.
- ✓ Effect During Time-Out:
 - Your account access is restricted, so You cannot deposit funds or place any bets.
 - You *can* still log in to withdraw any existing withdrawable balance.
 - You will be automatically removed from all marketing and promotional communications for the duration.
- ✓ After Time-Out: Your account access is automatically restored once the selected period expires. If you wish to extend it or consider self-exclusion, you need to take further action.

4.6 Self-Exclusion (Longer-Term Cessation):

- ✓ Purpose: This is a formal process for players who feel their gambling is problematic and need to stop gambling for a significant period, or permanently. It is a more serious commitment than a Time-Out.
- ✓ Durations: You can request self-exclusion for a minimum period of 1 year, 3 years, 5 years and 10 years up to permanent exclusion.
- ✓ Process:

- Self-exclusion **must be** requested by contacting our trained Customer Support team directly via support link to our webpage. This cannot be activated solely through account settings due to its serious nature.
 - Our team will explain the implications and require your explicit confirmation.
 - Once confirmed, the self-exclusion is implemented promptly and is generally **irrevocable** for the chosen duration.
- ✓ Effect During Self-Exclusion:
- Your account(s) with The Company will be immediately closed.
 - You will be blocked from logging in, depositing, or placing bets.
 - Any remaining withdrawable funds in your account will be returned to you via your registered payment method (subject to standard security and verification checks). Details on this process will be provided during the request.
 - You will be permanently removed from all marketing lists.
 - Preventing Re-registration: The Company will take all reasonable measures to detect and block any attempts by you to open new accounts using registered details (name, date of birth, address, email, payment methods, IP address checks where appropriate). However, the ultimate responsibility lies with you to uphold the exclusion agreement. Using false details to circumvent exclusion is a breach of terms.
- ✓ After Self-Exclusion Period:
- For definite-term exclusions: Your account is *not* automatically reopened. You must proactively contact Customer Support after the exclusion period has ended if you wish to consider returning. A cooling-off period (e.g., 24 hours) and potentially a review process may apply before reactivation is permitted.
 - For permanent exclusions: The account will remain closed indefinitely.

5. Rigorous Protection of Minors (Strictly 18+)

The Company enforces a strict policy against underage gambling. Participation is prohibited for individuals under the age of 18 (or the legal age for gambling in their jurisdiction, if higher).

- **Mandatory Age Verification:** We employ robust verification procedures at various stages:
 - ✓ Registration: Initial checks may occur.
 - ✓ Deposit/Withdrawal: Verification is often mandatory before processing withdrawals or upon reaching certain deposit thresholds.
 - ✓ Process: This typically involves submitting copies of official identification documents (e.g., Passport, Driver's License, National ID card) and potentially proof of address (e.g., utility bill). We utilize third-party services and internal checks to validate authenticity.
 - ✓ Re-Verification: We reserve the right to request re-verification at any time.
- **Consequences of Underage Access:** If any player is found to be underage:
 - ✓ The account will be immediately closed.
 - ✓ All bets placed will be voided.
 - ✓ Any deposits made may be returned (potentially subject to regulatory guidance).
 - ✓ Any winnings will be forfeited.
 - ✓ The matter may be reported to relevant authorities.
- **Parental Responsibility & Tools:** We urge parents and guardians to take an active role in preventing underage access:
 - ✓ Secure Your Devices: Use passwords/PINs on computers and mobile devices.
 - ✓ Protect Account Details: Never share your login credentials.
 - ✓ Use Filtering Software: Install parental control or filtering software to block access to gambling websites. Examples include:
 - NetNanny (www.netnanny.com)
 - CyberPatrol (www.cyberpatrol.com)
 - GamBlock (www.gamblock.com) - Specifically designed to block gambling sites.

6. Staying Informed and Accessing External Support

Knowledge and external support are vital components of responsible gaming. We strongly encourage you to:

- **Educate Yourself:** Understand the risks and maintain awareness of your habits.
- **Talk to Someone:** If you're feeling concerned, talking to trusted friends or family can be a helpful first step.

- **Seek Professional Help:** If you suspect a problem, confidential and specialized support is available. Contacting these organizations is free and can make a significant difference:
 - ✓ Gambling Therapy: Provides multilingual online support (text-based live support, forums, email support) for individuals outside the UK affected by problem gambling. www.gamblingtherapy.org
 - ✓ Gamblers Anonymous (GA): An international fellowship offering support groups based on a 12-step recovery program. Find local meetings via their website. www.gamblersanonymous.org
 - ✓ GamCare (Primarily UK, but offers resources): Provides information, a helpline, online chat, and resources for problem gamblers and their families. www.gamcare.org.uk

7. Trained and Supportive Staff

Our Customer Support team members receive specific training on:

- Understanding this Responsible Gaming Policy and the tools available.
- Recognizing potential signs of problem gambling or player distress during interactions.
- Communicating empathetically and non-judgmentally.
- Guiding players on how to set limits or initiate Time-Out and Self-Exclusion procedures.
- Providing information on external professional help organizations.
- Escalating complex cases to specialized staff where necessary.

Important Note: While our staff are trained to assist with responsible gaming tools and resources, they are **not qualified** therapists or counsellors. Their role is to provide information and support within the framework of our policies and direct you to professional help when needed. This training is refreshed periodically.

8. Responsible Marketing, Advertising, and Promotions

The Company adheres to ethical marketing practices:

- **Targeting:** We do not target our advertising at minors or individuals known to be vulnerable or self-excluded.
- **Content:** Our marketing communications aim to be truthful and will not:
 - ✓ Mislead players about their chances of winning.
 - ✓ Portray gambling as a solution to financial, social, or personal problems.
 - ✓ Suggest gambling is a rite of passage or necessary for social acceptance.

- ✓ Link gambling to enhanced attractiveness or sexual success.
- ✓ Encourage excessive play or pressure players to gamble.
- **Bonus Clarity:** All promotional offers (bonuses, free spins) come with clear Terms and Conditions, including wagering requirements and expiry dates, readily accessible to players.
- **Opt-Out:** Players can easily manage their marketing preferences and opt-out of receiving promotional communications via their Account or by clicking unsubscribe links in emails.

9. Player Account Security

You play a role in maintaining the security of your account. We advise you to:

- Choose a strong, unique password.
- Never share your login details with anyone.
- Log out of your account after each session, especially on shared devices.
- Be wary of phishing attempts (emails or messages asking for your login details). The Company will never ask for your full password via email.

Protecting your account helps prevent unauthorized access, including potential use by minors or others who should not be gambling.

10. Data Privacy and Confidentiality

Information related to your use of responsible gaming tools (e.g., limits set, Time-Out or Self-Exclusion status, related communications with support) is considered sensitive personal data. The Company processes this data solely for the purposes of:

- Implementing the responsible gaming measures you request.
- Complying with our legal and regulatory obligations under Curacao law.
- Monitoring and improving our responsible gaming practices.
- Preventing harm and supporting player protection.

All such data is handled with strict confidentiality and in accordance with applicable data protection laws and our detailed Privacy Policy.

11. How to Contact Us Regarding Responsible Gaming

Our Customer Support team is available to discuss any concerns you may have about your gambling or to assist you with using our responsible gaming tools. Please reach out:

- **Preferred Method for Exclusion Requests:** Email to our support (clearly state "Responsible Gaming Request" or "Self-Exclusion Request" in the subject line for prioritization).
- **General Queries & Limit Setting:** Live Chat available on our web site during operating hours.
- **Account Tools:** Access self-service tools directly 24/7 via Account Settings.

We aim to respond to responsible gaming queries promptly and sensitively.

12. Policy Review, Governance, and Updates

This Responsible Gaming Policy is a living document. It is formally reviewed at least annually, and additionally whenever significant regulatory changes occur or internal reviews suggest improvements are needed. The review process is overseen by our Support Team. We reserve the right to update this policy, and the latest version will always be available on our website. Continued use of our services after updates constitutes acceptance of the revised policy.

13. Dispute Resolution

If you have a complaint related to our responsible gaming procedures or how your request was handled, please refer to our standard Complaints Procedure. We take such matters seriously and will investigate thoroughly.

14. Governing Law

This Responsible Gaming Policy is governed by and interpreted in accordance with the laws of Curacao.

Thank you for taking the time to read our Responsible Gaming Policy. We are committed to providing a safe and enjoyable environment for all our players. Play responsibly.