



Project:	Responsible Gaming Policy
Date:	1 st April 2026

Responsible Gaming Policy

Operator: Paradise Gaming N.V.

Licence: Curaçao Gaming Authority (CGA) – Licence No. [OGL/2024/196/0574]

Effective date: 1st April 2026

Applies to: All websites, mobile products, customer support channels, marketing communications, affiliates, ambassadors, sponsored partners, influencers, and other third parties acting on behalf of the operator.

Paradise Gaming N.V. is committed to providing gambling services in a fair, safe, and socially responsible manner. Gambling is intended to be a form of entertainment only and must never be promoted or treated as a way to solve financial problems, generate income, or secure an investment return. This policy explains the tools, controls, internal procedures, and customer protections used to reduce gambling-related harm and to meet Curaçao responsible gaming requirements.

Core Principles

- I. Paradise Gaming N.V. applies the following responsible gaming principles across its operations:
- Gambling should remain a leisure activity and not become harmful.
 - Customers must be given practical tools to manage their play.
 - Vulnerable persons and minors must be protected.
 - Signs of gambling-related harm must be identified early and addressed proportionately.
 - Responsible gaming interactions, decisions, and interventions must be documented.
 - Marketing and advertising must be socially responsible, transparent, and not exploitative.
 - Staff must be trained and ready to identify and respond to indicators of gambling distress.



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II. Safer Gambling Tools

Customers are provided with responsible gaming tools that are accessible through the account area or through customer support. These tools are designed to help customers stay in control of their gambling behaviour.

- **Deposit Limits**

Customers may set daily, weekly, or monthly deposit limits. Any request to make a limit more restrictive takes effect immediately. Any request to relax or increase a limit is subject to a cooling-off delay and confirmation process before becoming effective.

- **Loss Limits**

Where available, customers may set a maximum loss amount over a defined period. Once the limit is reached, further gambling activity may be restricted until the relevant period resets.

- **Reality Checks and Session Reminders**

Customers may activate session reminders or reality check notifications that provide on-screen information about time spent, gambling activity, and amounts staked or lost.

- **Cooling-Off**

Customers may take a short-term break for a defined period, including 24 hours, 7 days, 1 month, or 3 months. During a cooling-off period, account access for gambling is restricted and direct marketing communications are suppressed where applicable.

- **Self-Exclusion**

Customers may choose to self-exclude for longer periods, up to 5 years where available. Self-exclusion takes effect as soon as operationally possible and blocks gambling access during the exclusion period. Self-excluded customers will not receive direct marketing during the exclusion period. Reversal is not permitted during the selected exclusion term.

III. Identification of Risk and Player Profiling

Paradise Gaming N.V. operates a player profiling and risk assessment framework to identify levels of gambling-related risk. Player profiles are established and maintained using customer data, account behaviour, transactional activity, and responsible gaming indicators.



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The purpose of profiling is to assess whether a customer presents a low, medium, or high risk of gambling-related harm and to determine whether intervention is required. Risk assessment may consider factors including, but not limited to:

- Frequency and duration of play.
- Sudden increases in deposits, stakes, or losses.
- Repeated failed deposit attempts.
- Chasing losses or repeated high-intensity play.
- Reversal or repeated changes to limits.
- Signs of distress in communications with staff.
- Use of multiple payment methods or unusual spending patterns.
- Previous responsible gaming interactions, cooling-off periods, or self-exclusion history.

Player profiles are reviewed on an ongoing basis and may trigger manual review, automated alerts, customer contact, additional safeguards, or account restrictions.

IV. Notifications for Concerning Behaviour

Paradise Gaming N.V. may employ automatic or manual notifications, including pop-up messages, emails, in-product alerts, or direct customer contact, when concerning behaviour is detected.

These notifications may be used to:

- Remind customers of time spent or money staked.
- Encourage use of deposit, loss, or session limits.
- Suggest a cooling-off period or self-exclusion.
- Direct customers to support resources.
- Prompt customers to review their gambling behaviour before continuing.



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Notifications are designed as protection measures and may be tailored according to the customer's risk profile.

V. Responsible Gaming Interactions

Where indicators of risk or harm are identified, Paradise Gaming N.V. may carry out responsible gaming interactions with the customer. These interactions may be automated, manual, or a combination of both, and may occur through live chat, email, telephone, or in-platform messaging.

- Responsible gaming interactions may include:
- Providing information about safer gambling tools.
- Asking the customer to reflect on their gambling behaviour.
- Encouraging the customer to set limits, take a break, or self-exclude.
- Providing details of professional support organisations.
- Applying proportionate account restrictions where necessary.
- All responsible gaming interactions must be conducted sensitively, respectfully, and in a structured manner appropriate to the level of risk presented.

VI. Recording of Responsible Gaming Interactions

All responsible gaming interactions, alerts, reviews, decisions, and follow-up actions must be recorded in the operator's Player Account Management system (PAM system). Records must be sufficiently detailed to show:

- The reason for the interaction or review.
- The risk indicators observed.
- The date and time of the interaction.
- The staff member or automated process involved.
- The information or advice provided to the customer.
- Any action taken by the customer or the operator.
- Any escalation, restriction, or follow-up requirement.

These records support consistency, oversight, regulatory compliance, and ongoing customer protection.

VII. Record-Keeping Policy



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Paradise Gaming N.V. maintains responsible gaming records in accordance with its legal, regulatory, and operational obligations. Records are retained securely and made available to authorised personnel and regulators where required.

Responsible gaming records may include:

- Risk assessments and player profile classifications.
- Responsible for gaming alerts and monitoring reports.
- Copies or logs of communications with customers regarding responsible gaming.
- Details of limits, cooling-off periods, self-exclusion requests, and account restrictions.
- Training completion records for relevant staff.
- Internal reviews, escalations, and management decisions relating to customer protection.
- Marketing approval records relating to responsible gaming compliance.

Records must be accurate, complete, tamper-resistant where possible, and retained for the period required under applicable laws, regulations, licence conditions, and internal compliance procedures.

VIII. Staff Training and Readiness

All relevant employees, agents, and customer-facing personnel must receive responsible gaming training appropriate to their role. Training is provided at induction and refreshed periodically.

Training covers at least:

- Recognising signs of gambling distress and indicators of harm.
- Conducting sensitive and structured conversations with at-risk customers.
- Directing customers to appropriate support resources and responsible gaming tools.
- Understanding the operation of limits, cooling-off, self-exclusion, and other harm-reduction tools.
- Recording responsible gaming interactions correctly in the PAM system.
- Escalating cases that require enhanced review or urgent intervention.



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- Understanding the operator’s restrictions on advertising and promotional conduct.

The operator maintains records of completed training and monitors staff readiness through quality assurance, supervision, and refresher training.

IX. Advertising, Marketing, and Third-Party Standards

Paradise Gaming N.V. requires all advertising, promotional activity, and marketing communications to be socially responsible and compliant with responsible gaming obligations.

The operator must not engage in irresponsible advertising or permit third parties acting on its behalf to do so. In particular:

- Marketing must not target vulnerable groups.
- Marketing must not target or appeal primarily to minors.
- Marketing materials must not feature minors or depict them engaging with gambling content.
- Gambling must not be portrayed as an investment, wealth strategy, or financial solution.
- Marketing must not misrepresent games of chance as being primarily determined by skill.
- Marketing must not use emotional manipulation, pressure, or exploit personal hardship.
- Marketing must not include explicit content.
- Marketing must not encourage unrelated harmful behaviours.
- Bonuses and promotions must be communicated transparently, with material terms clearly disclosed.
- Bonuses and promotions must not be designed or presented in a way that encourages excessive gambling.
- All advertising must include a clearly visible responsible gaming message or slogan.

Paradise Gaming N.V. is responsible for materials distributed by affiliates, representatives, sponsorships, ambassadors, social media influencers, media buyers, and other contracted third parties acting on its behalf. All such parties must be informed of, and required to follow, this responsible gaming policy and related marketing standards.



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The operator reserves the right to review, reject, suspend, or remove non-compliant advertising or promotional content and to terminate third-party relationships for breaches of responsible gaming obligations.

X. Support and External Help

Customers who may be experiencing gambling-related harm are encouraged to seek support and make use of responsible gaming tools immediately. Support information is made available through the website, help centre, and customer support channels.

- Independent support organisations may include:
- Fundashon pa Maneho di Adikshon (FMA), Curaçao – <https://fma-curaçao.com>
- GamCare – <https://www.gamcare.org.uk>
- GambleAware – <https://www.begambleaware.org>
- Gamblers Anonymous – <https://www.gamblersanonymous.org>

The operator may update support resources from time to time to reflect the customer's jurisdiction or available local services.

XI. Protection of Minors and Vulnerable Persons

Paradise Gaming N.V. uses age and identity verification controls to prevent underage access. Accounts suspected of belonging to minors may be suspended or closed pending review.

The operator also seeks to identify and protect vulnerable customers through monitoring, risk assessment, customer interaction, limit tools, exclusion options, and referral to support resources.

XII. Complaints and Escalation

Customers may contact customer support if they have concerns about gambling-related harm, account restrictions, self-exclusion, or this policy. Complaints are handled in accordance with the operator's complaints procedure and may be escalated to the applicable dispute resolution mechanism where relevant.

XIII. Governance and Review

This policy is approved by management and reviewed periodically, and whenever required by law, licence conditions, regulatory guidance, or operational change.



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Responsible gaming controls may be updated from time to time to maintain effectiveness and regulatory compliance.

XIV. Complaints & dispute resolution (ADR)

If something isn't right:

- Contact us first via Live Chat or support @ paradisegames441@gmail.com — we aim to resolve any complaints quickly.
- If you're not satisfied, you can escalate to our independent ADR provider (approved by the Curaçao Gaming Authority). We'll share the link and case reference in our reply.
- We cooperate fully with ADR decisions.