

OPTIM DEVELOPMENT B.V.

Responsible Gaming Policy

Effective Date:

20.09.2025

Next Review

Date:

10.01.2026



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1. Purpose

This policy sets the rules Optim Development B.V. uses to keep gambling safe as entertainment, protect vulnerable people, and comply with Curaçao law and regulation.

2. Scope

Applies to all Optim Development B.V. brands, websites, apps, staff, contractors and third parties who interact with players.

3. Legal and Regulatory Framework

- National Ordinance on Games of Chance (“LOK”).
- Curaçao Gaming Authority (“CGA”) Responsible Gaming requirements.

4. Definitions

Responsible Gaming – Making sure gambling remains entertainment and does not cause harm.

Vulnerable Person / Vulnerable Player – A under 18, or a person who shows signs of loss of control or gambling-related harm.

Cooling-Off – A temporary break chosen by the player during which the player cannot place bets.

Self-Exclusion – A long-term, irrevocable block from all gambling activities under the operator’s licence.

Player Account Management (“PAM”) system – The system used by the Company to manage accounts, records and Responsible Gaming interactions.

Terms and Conditions (“T&C”) – The rules players accept when using the Company’s services.

Alternative Dispute Resolution (“ADR”) – An independent body that helps resolve complaints when the Company and player cannot agree.

5. Roles and Responsibilities

The Compliance Officer also acts as the Responsible Gaming Officer and is responsible for implementation, monitoring, staff training, and reporting to management.

6. Responsible Gaming Principles

6.1 Protecting Minors (18+). No one under 18 may register or gamble. Warning signs (18+) are shown on the website/app and in marketing. If a minor is found, the account is closed immediately, deposits are refunded, winnings are voided, and the incident is recorded in the Player Account Management system.

6.2 Preventing Excessive Play. Gambling is entertainment, not a source of income. The Company does not offer credit for betting. Risk signals are monitored and early action is taken when needed.

6.3 Player Control Tools. Players can set deposit limits, take a Cooling-Off break, apply Self-Exclusion, enable Reality Checks, opt out of marketing and view account history. Tightening a limit applies immediately. Relaxing a limit takes effect only after a 24-hour cooling period.

6.4 Fairness and Transparency. The Company provides clear Terms and Conditions and bonus rules. Responsible Gaming measures must never be used to delay legitimate withdrawals.

6.5 Early and Proportionate Intervention. Start with the least intrusive measure and escalate only if risk persists. All contacts and actions are logged for audit.

7. Protection of Minors (Controls)

To ensure no person under 18 can access our services, the Company implements the following controls:

- Age-gate registration — block sign-up attempts from users who declare under-18.
- Verify government ID before first withdrawal — confirm age and identity using valid photo ID.
- Apply enhanced checks when risk is indicated — request additional proof (e.g., selfie/POA) if data or behaviour raises concern.
- Close accounts confirmed as minor and refund deposits — immediately terminate access, refund deposited funds, void winnings, and record the incident.

8. Player Protection Tools

To help players manage their gambling, the Company provides the following self-service tools in the account area:

- Set deposit limits — cap daily/weekly/monthly deposits (tightening applies immediately; loosening after a 24-hour delay).
Take a Cooling-Off break — temporarily block play for 24 hours, 7 days, or 1/3 months.
- Apply Self-Exclusion — block access for 1/3/5/10 years or lifetime (across all Company brands).

- Enable Reality Checks — receive in-session time/spend reminders.
- Opt out of marketing — stop promotional emails, SMS and push notifications.
- View account and betting history — access recent transactions, play time and limits to make informed decisions.

9. Behaviour Monitoring

The Company monitors for patterns that indicate loss of control or increased risk. One signal alone may not be decisive; multiple signals together increase risk.

Escalating Deposits or Intensity – Sudden spikes in deposit amounts or frequency versus the player's normal behaviour. Action: prompt to set limits; if persistent, escalate.

Reversals of Withdrawals – Cancelling withdrawals and continuing to play, suggesting chasing losses. Action: prompt Cooling-Off; if repeated, apply a mandatory limit or short suspension.

Excessive Session Length or Frequency – Very long sessions or many sessions with minimal breaks. Action: Reality Check prompts; suggestion to end session; escalate if ignored.

Multiple Account Attempts – Attempts to open new accounts to bypass limits or blocks. Action: enhanced verification, block duplicates, possible exclusion.

Other Signals – Frequent failed payments; agitated contacts requesting bonuses; frequent changes of limits; maxed cards. Action: assess with 9.1–9.4 and escalate if needed.

10. Intervention Process

Interventions are risk-based and must not be used to delay lawful withdrawals. Each step is recorded in the Player Account Management system with the trigger, time, action and outcome.

10.1 Level 1 — Educational Notification. Neutral pop-up, email or chat with clear links to Responsible Gaming tools (limits, Cooling-Off, Self-Exclusion) and external support resources. Trigger: first or low-level indicator. Response within 24 hours (automated prompts may be immediate).

10.2 Level 2 — Mandatory Limits. Apply a tighter daily or weekly deposit limit (or restrict a product) when repeated indicators appear within a short period. Calibrate to the player's recent behaviour (for example, 50–70% of the average weekly deposits). Notify the player and state duration.

10.3 Level 3 — Temporary Suspension. Short pause (24–72 hours) to evaluate risk and contact the player with support options, including Self-Exclusion. Use when several indicators persist and Level 2 was ineffective.

10.4 Level 4 — Operator-Initiated Exclusion. Long-term exclusion where serious or persistent risk exists or the player tries to bypass controls. Block log-ins and new registrations and, where lawful and feasible, flag known payment instruments during the exclusion period.

10.5 Communication Rules. Tone must be neutral and supportive. Do not offer promotions or bonuses during interventions. Maintain audit trails and run periodic quality checks.

11. Responsible Marketing Standards

No targeting minors or vulnerable groups; no claims that gambling solves financial or emotional problems; clear bonus terms; Responsible Gaming message on all ads; oversight of affiliates and influencers.

12. Staff Training

Onboarding and annual refreshers for customer support, VIP and marketing teams: recognising risk signs, handling sensitive conversations, and using tools.

13. Record-Keeping and Reporting

Keep Responsible Gaming interactions, exclusions and limit changes in the Player Account Management system; retain records for at least five years or longer if law requires. Report material incidents to the Curaçao Gaming Authority when required.

14. Policy Governance and Review

Reviewed at least annually or upon regulatory change. The Compliance Officer provides an effectiveness report to management.

Material updates are notified to the Curaçao Gaming Authority where applicable.