

SoftClub N.V.

Operations Manual

Version 1.0

Registration Number: 161730

Registered Address: Zuikertuintjeweg Z/N Landhuis Zuikertuintje, Curacao

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1. Introduction

1.1 Purpose of the Operations Manual

The purpose of this Operations Manual is to provide a comprehensive guide that ensures the operations of the platform remain in full compliance with the laws and regulations set forth by the Curacao Gaming Authority. The manual serves as an authoritative operational guide and includes, at a minimum:

- A description of the games of chance offered, including payment methods, bet limits, payout structures, game software, and outcome-determining mechanisms;
- The testing methods periodically used to ensure ongoing quality and compliance;
- The procedures and safeguards for storing personal data and other player-related information;
- A summary of the visual elements presented to players through the gaming website or application;
- The technical measures implemented to prevent access to the games by natural persons who are prohibited under the National Ordinance from participating;
- A diagram and explanation of the technical infrastructure, including recovery measures in the event of an operational incident;
- A description of how the principles of responsible gaming are embedded in the operation in line with Articles 2.2(3), 5.4, and 5.6 of the LOK;
- The current version of the general terms and conditions used in the operation;
- A description of the procedure for resolving player disputes;
- And details on the digital records kept of players, game transactions, and financial transactions, stored in a Tier-IV certified data center located in Curaçao, accessible to the Curaçao Gaming Authority (CGA) at all times.

1.2 Regulatory Compliance Overview

This section outlines the regulatory framework applicable to the operation of a gaming platform licensed under Curaçao gaming legislation. The platform is required to comply with the regulatory standards and obligations established by the Curaçao Gaming Authority (CGA), as well as any other applicable legal and operational requirements governing licensed gaming activities.

1.3 Scope of the Manual

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The Scope of the Manual defines the operational, technical, compliance, and governance areas covered by this document. It describes the platform activities, internal procedures, departmental responsibilities, and control measures required to ensure that the gaming operation is conducted in accordance with Curaçao gaming legislation, the requirements of the Curaçao Gaming Authority, the National Ordinance on Games of Chance (LOK), and applicable international regulatory standards.

The scope of this Manual includes the following areas:

Description of Games of Chance Offered

This section describes the games of chance made available under the licence, including the types of games offered, applicable rules, payment methods, betting limits, payout structures, software used, and the elements that determine game outcomes.

Quality Monitoring and Game Testing

This section sets out the procedures and methods used to monitor, test, and verify the quality, fairness, technical stability, and proper functioning of the games offered on the platform.

Storage of Player Data

This section outlines the procedures for collecting, processing, storing, protecting, and retaining player data, including personal information, account records, gaming transactions, financial transactions, and other relevant records, in accordance with applicable data protection requirements and the LOK.

Visual Presentation

This section describes the visual interface and player-facing elements of the gaming website and/or application, including branding, responsible gaming information, mandatory notices, warning messages, and other information displayed to players.

Access Control for Excluded Individuals

This section explains the technical and procedural measures implemented to prevent access to games of chance by individuals who are prohibited from participation under applicable law, including minors, self-excluded players, bankrupt individuals, and other excluded categories of natural persons.

Technical Infrastructure and Emergency Restoration

This section describes the platform's technical infrastructure, including system architecture, hosting arrangements, redundancy measures, backup procedures, business continuity controls, and emergency restoration processes in the event of technical disruption or system failure.

Implementation of Responsible Gaming Principles

This section describes how responsible gaming principles are integrated into the platform's operations, including self-exclusion tools, cooling-off periods, deposit, loss and time limits, player protection measures, monitoring procedures, and compliance with the relevant provisions of the LOK, including Articles 2.2(3), 5.4, and 5.6.

General Terms and Conditions

This section includes the current version of the general terms and conditions applicable to players, including the rules accepted by players upon registration and during use of the platform.

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Dispute Resolution Mechanism

This section describes the procedures for receiving, reviewing, escalating, and resolving player complaints, including applicable timelines, internal escalation steps, and access to alternative dispute resolution mechanisms in accordance with Article 5.3 of the LOK.

Digital Records and Server Location

This section provides details on the digital storage of critical records relating to players, game sessions, gaming transactions, and financial transactions. It also describes the measures ensuring that such records remain continuously accessible to the Curaçao Gaming Authority and are hosted in accordance with applicable requirements, including the requirement for storage in a Tier-IV certified data centre physically located in Curaçao.

Security and Compliance Controls

This section describes the internal controls, security measures, access restrictions, monitoring procedures, and compliance processes implemented to protect the integrity of the platform, prevent unauthorised access, secure financial transactions, and maintain ongoing compliance with Curaçao licensing requirements.

Employee Roles and Responsibilities

This section outlines the roles and responsibilities of employees and relevant departments involved in maintaining regulatory compliance, operational standards, data security, responsible gaming controls, complaint handling, technical monitoring, and reporting obligations. It also covers employee training and awareness of applicable regulatory requirements.

2. Games and Betting Operations

2.1 Overview of Games Offered

The gaming platform offers a diverse portfolio of games of chance, including RNG-based slot games, table games, crash and instant-win games, and live dealer games. The games are supplied by reputable third-party game providers and are operated either through certified Random Number Generator (RNG) technology or approved live dealer systems and procedures. These controls are intended to ensure the fairness, transparency, integrity, and regulatory compliance of the games made available to players.

Game Categories

Slots

The platform offers a range of slot games, including classic slot machines, video slots, jackpot-based games, high-volatility slots, multiplier games, and games with dynamic reel mechanics.

Table Games

The platform provides digital versions of traditional casino table games, including blackjack, roulette, baccarat, poker, and other approved table game variants.

Crash and Instant-Win Games

The platform may offer crash-style and instant-win games, where the outcome is determined by a certified game mechanic, such as a progressive multiplier model or other predefined outcome-generating system.

Live Dealer Games

The platform may also provide live dealer games streamed in real time from approved studios. These games may include blackjack, roulette, baccarat, Sic Bo, Andar Bahar, Teen Patti, and other live casino formats, operated in accordance with applicable live dealing protocols.

Certified Game Providers and Technologies

The games offered on the platform are supplied by game providers whose products, RNG systems, game logic, and/or live dealer operations have been tested and certified by accredited independent testing laboratories, where applicable. Such certification confirms that the relevant games meet recognised technical, fairness, randomness, and integrity standards applicable to online gaming operations:

1. Kendoo
2. F* Bastards
3. Pragmatic Play
4. 3 Oaks Gaming
5. 1X2 Network
6. Airdice

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7. Amigo Gaming
8. Apparat
9. Amusnet
10. BetonGames
11. 5X Games
12. Bigpot
13. Caleta Gaming
14. CT Interactive
15. EA gaming
16. Endorphina
17. Ela Games
18. Gamzix
19. Greentube
20. Iconix
21. Mancala Gaming
22. Iron Dog Studio
23. JVV (Just for the Win)
24. KA Gaming
25. Macaw Gaming
26. Merkur Gaming
27. Nolimit City
28. Nolimit City A
29. NetGame Entertainment
30. Novomatic
31. OneTouch
32. Onlyplay
33. PG Soft
34. Platipus
35. Playson
36. PopOK Gaming
37. Play'n GO
38. Prospect Gaming

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- 39. RetroGames
- 40. Quickspin
- 41. SmartSoft Gaming
- 42. Spearhead Studios
- 43. Spinomenal
- 44. TaDa Gaming
- 45. Slotopia
- 46. BGaming
- 47. Spinmatic
- 48. nolimitcityWC
- 49. BlueJack
- 50. GoodStar
- 51. Peter & Sons
- 52. Funky Games
- 53. Fugaso

All Random Number Generator (RNG) systems used by the platform are required to meet applicable regulatory and technical standards relating to randomness, unpredictability, integrity, and security.

The RNG systems are assessed against the following key criteria:

Randomness

Game outcomes must be statistically random and distributed in a manner that does not create predictable patterns or unfair advantage.

Unpredictability

RNG outputs must not be capable of being predicted, manipulated, or reasonably guessed by players, operators, employees, service providers, or any unauthorised third party.

Non-Reproducibility and Integrity

Game outcomes must not be capable of being recreated, altered, or reverse-engineered in the live gaming environment. Seed values, entropy sources, initialisation parameters, and other outcome-determining elements must be securely protected to prevent unauthorised access, reuse, manipulation, or reconstruction of results.

Security and Compliance

The RNG systems and, where applicable, live dealer mechanisms used in the games are subject to independent testing, certification, and periodic review. Such assessments may include statistical randomness testing, source code review, entropy validation, game logic verification, and technical security checks.

Testing may include recognised statistical test methods and test batteries, such as Diehard, NIST-based

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testing, Chi-Square analysis, and other industry-accepted evaluation methods. Certification is carried out by independent testing laboratories accredited to relevant international standards, including ISO/IEC 17025, such as GLI, BMM Testlabs, iTech Labs, NMI, QUINEL, eCOGRA, or other approved testing bodies.

These testing and certification procedures are intended to confirm that the games operate fairly, that outcomes are generated independently and without improper influence, and that the platform maintains compliance with applicable technical, fairness, and regulatory requirements.

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2.2 Betting Rules and Payment Possibilities

Betting Rules

Eligibility

Users must be at least 18 years of age, or such higher minimum age as may be required under applicable law in the relevant jurisdiction, in order to register, access, or participate in betting and gaming activities on the platform.

Account Verification

Before placing bets or using certain platform functions, users are required to complete the account verification process. This may include the submission of valid identification documents, proof of address, payment method verification, and any other information required for know-your-customer, anti-money laundering, fraud prevention, and regulatory compliance purposes.

Bet Placement

Bets may be placed on the games and betting products made available on the platform, subject to the applicable rules, limits, and conditions of each game or betting event. Once a bet has been confirmed and accepted by the system, it cannot generally be cancelled, amended, or reversed, except where expressly permitted under the applicable game rules, platform terms, or regulatory requirements.

Fair Play

All betting and gaming activities are subject to monitoring in order to detect fraud, collusion, abuse, manipulation, money laundering, prohibited player activity, or other suspicious conduct. Where suspicious, unlawful, or non-compliant activity is identified, the platform may take appropriate measures, including restricting functionality, suspending the account, cancelling affected transactions, withholding withdrawals pending review, or terminating the account in accordance with the applicable terms and regulatory obligations.

Payment Possibilities

Deposit Methods

Users may fund their accounts through the payment methods made available on the platform, which may include credit and debit cards, e-wallets, bank transfers, payment service providers, and other approved payment channels. The availability of specific payment methods may depend on the user's location, currency, verification status, risk profile, and the operational availability of the relevant payment provider.

Withdrawal Methods

Withdrawals may generally be processed through the same or equivalent payment method used for deposits, subject to account verification, anti-money laundering checks, payment provider requirements, internal risk controls, and applicable processing rules. The platform may require additional verification before approving or processing a withdrawal.

Transaction Limits

Minimum and maximum transaction limits may apply to deposits and withdrawals. Such limits may vary depending on the payment method, currency, user location, account status, verification level, risk assessment, and applicable regulatory or payment provider requirements. Users may view the relevant limits through their account dashboard or the applicable payment section of the platform.

Processing Times

Deposits are generally processed instantly or within a short period after confirmation by the relevant payment provider. Withdrawal processing times may vary depending on the selected payment method,

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completion of verification checks, internal review requirements, banking procedures, and payment provider processing timelines. Withdrawals may take up to five business days or longer where additional checks are required.

2.3 Bet Amounts and Payouts Bet Amounts:

- **Minimum Bet:** The minimum bet amount varies depending on the game or event. Users should check the specific game rules for exact figures.
- **Maximum Bet:** Maximum bet limits are set to ensure responsible gaming and may vary across different games and events.
- **Currency:** All bets are placed in the currency selected during account registration.
- Players can place different types of bets including Single, Multi (Ordinary), Express, and System bets.
- The platform offers flexible stake entry with features such as:
 - Manual input field with currency indicator.
 - Quick Bet buttons with customizable predefined amounts.
 - A “Max” button to auto-fill the maximum stake allowed.
 - Freebet toggle (if granted) for placing bets using bonus credits.

Payouts:

- **Winning Bets:** Payouts for winning bets are credited to the user's account balance automatically after the event's outcome is confirmed.
- **Payout Calculation:** Payouts are calculated based on the odds at the time the bet was placed and the bet amount.
- **Withdrawal of Winnings:** Users can withdraw their winnings subject to meeting any wagering requirements and verification processes.
- **Taxes:** Users are responsible for reporting and paying any applicable taxes on their winnings as per their local laws.
- Winnings are calculated automatically based on the odds and stake amount shown at the time of bet confirmation.
- A calculator icon in the bet slip allows users to:
 - View potential winnings.
 - Adjust bet combinations (e.g., system types like 2/3, 5/10).
- Payout tables and special prize information are available in the Promo Sport section of the platform.

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- All winning amounts are credited directly to the player's balance, displayed in the selected currency at all times.
- Win/loss transaction history can be reviewed in the player profile under "Operations History".

2.4 Software and Technology Used

The platform utilizes a robust, integrated betting system with the following technological capabilities:

- **Transaction Tracking:**
 - Full gaming transaction history for the last 90 days.
 - Financial history showing total deposits, withdrawals, and win/loss summaries.
- **Real-Time Game Information:**
 - Live broadcasts, match statistics, lineups, and results.
 - Pre-match and in-play game data provided on event selection.
- **User Interface Components:**
 - Interactive bet slip with configurable settings.
 - Graphical display of betting options and results.
 - Responsive controls for stake input, odds acceptance, and system betting configurations.
- **Currency and Balance Management:**
 - Real-time balance display in the user's chosen currency.
 - Update of balances during gameplay.
- **Regulatory Compliance:**
 - Display of betting rules, restrictions, and game-specific instructions.
 - System-generated Game IDs and detailed descriptions for all offered games.

2.5 Outcome-Determining Elements

The outcome of each bet placed on the Company platform is determined by transparent, verifiable elements specific to the type of event and betting market. These elements are designed to ensure fairness, clarity, and compliance with regulatory standards. The main outcome-determining elements include:

1. Official Event Results

- For sports betting, outcomes are determined strictly by the official results provided by the governing body of the respective sport or event (e.g., final score, match winner, time-based results).

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- In the case of live betting, outcomes are based on real-time data feeds and are locked in when the bet is placed.

2. Game Engine Results (for Virtual Sports & RNG-based Games)

- For virtual sports or instant games, outcomes are determined using certified Random Number Generators (RNGs).
- Each game or event has a unique identifier and a verifiable outcome, displayed with detailed descriptions and pay tables.

3. Odds and Markets

- The potential payout is calculated using the odds visible at the moment the bet is confirmed.
- Odds may change dynamically for live events but are locked for the player upon bet placement.

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4. Bet Type Logic

- Different bet types (Single, Express, System, Multi) use mathematical models to determine possible combinations and payout structures.
- System bets depend on a subset of outcomes being correct (e.g., 2 out of 3 wins in a 2/3 system).

5. Manual or Technical Verification

- In rare cases of data disputes, the platform refers to independent data providers or official recordings.
- Bets may be voided or adjusted if technical issues, incorrect lines, or rule breaches are detected.

6. Bonus Bet Conditions

- Freebets and promotional bets have predefined rules and outcome criteria.
- Winning from bonus bets is subject to the terms indicated in the bonus policy, such as rollover requirements or minimum odds.

3. A description of periodically used test methods for quality monitoring

Company applies a structured Quality Assurance (QA) framework to ensure that the gaming platform, operational processes, and supporting systems continuously operate in accordance with applicable regulatory requirements, technical standards, and internal quality objectives.

Quality monitoring activities are performed throughout the entire software development lifecycle and continue after deployment to production. Testing activities are conducted prior to every production release, after significant infrastructure changes, following security updates, and periodically according to the Company's Quality Assurance schedule.

The objective of the testing programme is to identify defects at the earliest possible stage, minimise operational risks, maintain system availability, and ensure that players receive a secure, reliable, and fair gaming experience.

Testing covers all critical platform components, including player account management, payment processing, Responsible Gaming controls, AML/KYC functionality, game integrations, reporting systems, security controls, and back-office administration.

The Company performs the following categories of quality monitoring:

Functional testing;
Regression testing;
Integration testing;
User interface testing;
Performance and load testing;
Security testing;
Payment workflow testing;

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Game integration verification;

Backup and disaster recovery testing;

Compliance verification.

3.1 Test Tenets

The Company's Quality Assurance activities are based on the following fundamental principles:

- testing is integrated throughout the entire software development lifecycle;
- all critical business functions shall be verified before deployment to production;
- testing shall be risk-based, prioritising functions affecting player funds, gaming integrity, security, and regulatory compliance;
- defects shall be documented, prioritised, corrected, and retested before release whenever possible;
- production releases shall only occur following successful completion of mandatory testing activities;
- testing processes shall support continuous improvement through regular review of testing effectiveness and defect trends.

The Quality Assurance process is designed to ensure that all software releases maintain system integrity, operational stability, information security, and regulatory compliance.

3.2 Environments Used for Testing

Testing activities are performed within dedicated environments that are logically separated from the production environment.

The Company maintains the following testing environments:

Development Environment

Used by software developers for implementation of new functionality, bug fixes, and preliminary technical verification.

Quality Assurance Environment

Used by the QA team to execute functional, regression, integration, usability, and system testing. The environment closely mirrors the production configuration while remaining isolated from live player data.

Staging Environment

A pre-production environment used for final validation before deployment. Configuration, software versions, infrastructure settings, and integrations are aligned as closely as reasonably practicable with the production environment.

Production Environment

The live operational environment serving players. Testing within production is limited to controlled verification activities that do not affect player transactions or gaming integrity.

Where test data is required, anonymised or synthetic data is used whenever practicable to prevent exposure of confidential player information.

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3.3 Test Case Design Requirements

Test cases are developed using a risk-based methodology to ensure adequate coverage of all business-critical functionality.

Test scenarios are prepared using functional specifications, business requirements, regulatory obligations, and previously identified defects.

Each test case includes, where applicable:

- unique test case identification;
- objective of the test;
- preconditions;
- execution steps;
- expected results;
- actual results;
- pass or fail status;
- tester identification;
- execution date.

Test coverage includes positive, negative, boundary, exception handling, and integration scenarios.

Particular attention is given to functionality involving:

- player registration;
- authentication and account security;
- deposits and withdrawals;
- payment processing;
- game launching and gameplay;
- bonus management;
- Responsible Gaming controls;
- AML/KYC verification;
- reporting and audit logging.

Regression test suites are periodically updated to reflect new platform functionality and resolved defects.

3.4 Testing Procedure and Requirements Management

Testing activities are conducted in accordance with documented testing procedures and approved software development practices.

Business, regulatory, and technical requirements are reviewed before development begins and are maintained throughout the project lifecycle.

Testing generally follows the following sequence:

1. Requirements review.

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2. Test planning.
3. Test case preparation.
4. Environment preparation.
5. Functional testing.
6. Integration testing.
7. Regression testing.
8. Performance and security verification where applicable.
9. Defect resolution and retesting.
10. Final Quality Assurance approval.
11. Production deployment.

Changes affecting regulated functionality, payment processing, Responsible Gaming measures, AML controls, or player account management receive additional review prior to implementation. Testing documentation is maintained as evidence of compliance with internal quality standards.

3.5 Defect Management Process

Any issue identified during testing is recorded within the Company's defect tracking process.

Each defect is assigned a severity and priority based on its potential operational, financial, security, or regulatory impact.

Defects are generally classified as:

- Critical – prevents operation of essential business functions, affects gaming integrity, player funds, or regulatory compliance.
- High – significantly impacts platform functionality or player experience.
- Medium – affects non-critical functionality with acceptable workarounds.
- Low – cosmetic issues or minor usability improvements.

Each defect record includes:

- defect identifier;
- description;
- affected system or module;
- reproduction steps;
- severity classification;
- assigned owner;
- current status;
- corrective actions taken;
- verification results;
- closure date.

Corrected defects are subject to verification testing before closure. Where appropriate, regression testing is also performed to confirm that the implemented correction has not adversely affected existing functionality.

Defect records are retained in accordance with the Company's record retention policy.

3.5 Metrics

The Company monitors Quality Assurance performance using predefined operational metrics to evaluate testing effectiveness and support continuous improvement.

Typical quality metrics include:

- number of executed test cases;
- test coverage percentage;
- pass and fail rates;
- number of identified defects;
- defect severity distribution;
- average defect resolution time;
- regression defect rate;
- production incident frequency;
- system availability;
- release success rate.

Quality metrics are periodically reviewed by management to identify trends, recurring issues, and opportunities for improving software quality and operational reliability.

3.6 Acceptance Criteria

Software changes may only be approved for production deployment after satisfying predefined acceptance criteria.

At a minimum, the following conditions shall be met:

- all planned testing activities have been successfully completed;
- critical and high-severity defects have been resolved or formally accepted through documented risk assessment;
- functional requirements have been verified;
- integration testing has been successfully completed;
- security testing has not identified unacceptable risks;
- payment processing and gaming functionality operate correctly;
- Responsible Gaming, AML, and regulatory controls function as intended;
- required documentation has been completed;
- Quality Assurance approval has been obtained.

Following successful completion of all acceptance criteria, the release may be authorised for deployment into the production environment in accordance with the Company's change management procedures.

3.7 Reporting

Reporting forms an essential part of the quality assurance and testing process. It provides relevant

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stakeholders with clear and structured information on testing progress, identified defects, defect trends, test coverage, release readiness, and the overall quality of the product.

Bug Reports

Bug reports are used to document identified defects, including their severity, priority, status, affected functionality, reproduction steps, supporting evidence, and current resolution progress. These reports also help track blocked tests, critical issues, and defects requiring immediate attention.

Feature/Epic Reports

Feature and epic reports provide a summary of testing activities related to specific product features or larger functional areas. They include information on test execution progress, test coverage, open and resolved defects, defect trends, and the readiness status of the relevant feature or epic.

Release Reports

Release reports provide an overall assessment of a release candidate prior to deployment. They include defect statistics, unresolved critical issues, testing coverage, regression testing results, performance indicators, known limitations, and a conclusion on whether the release meets the required quality criteria.

Ad-Hoc Reports

Ad-hoc reports are prepared upon request to address specific questions, risks, incidents, stakeholder concerns, or urgent quality-related matters. These reports may focus on a particular defect, feature, testing area, incident, or operational issue requiring additional analysis.

4. The way of storing players' personal data and other details

The protection and privacy of player data are essential to maintaining the trust, security, and integrity of the Company's gaming operations. This section outlines the procedures for collecting, processing, storing, protecting, and retaining personal data in accordance with applicable data protection laws and regulatory requirements, including the General Data Protection Regulation (GDPR) and the Curaçao data protection framework.

This section also describes the measures implemented to ensure the confidentiality, integrity, and availability of player data, as well as the procedures for managing player consent, responding to data subject requests, and safeguarding the rights of players in relation to their personal data.

4.1 Collection and Use of Personal Data

The personal data collected by the Company may include, but is not limited to, the following categories:

Identity Verification Details

This may include passport details, government-issued identification documents, proof of address, utility bills, photographs, and other documentation required to verify the identity, age, residency, and eligibility of the player.

Financial and Transaction Data

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This may include deposit and withdrawal records, payment method details, transaction history, account balances, payment provider references, chargeback records, refund information, and other data relating to financial activity on the platform.

Geolocation and Online Identifiers

This may include IP addresses, device information, browser type, operating system, login data, cookies, session identifiers, location-related data, and other technical information connected with the player's access to and use of the website, application, and services.

Behavioural and Browsing Activity

This may include traffic data, pages visited, time spent on the website, click-through activity, interaction with platform features, gaming activity patterns, responsible gaming indicators, session duration, and other usage data generated during the player's interaction with the platform.

4.2 Data Storage and Security Measures

The following measures are implemented to protect personal data:

Data Storage Locations

Personal data, including critical records relating to players, game transactions, gaming activity, and financial transactions, is stored in a manner that ensures continuous accessibility to the Curaçao Gaming Authority (CGA), where required. Such data is maintained through servers hosted in a Tier-IV certified data centre physically located in Curaçao.

The infrastructure is supported by VMware vSphere and Nutanix Hyper-Converged Infrastructure with SSD acceleration, providing resilience, scalability, redundancy, and fault tolerance.

Data Encryption

Personal data is encrypted both in transit and at rest in order to protect it against unauthorised access, disclosure, alteration, or loss.

Access Controls

Strict access control measures are implemented to ensure that sensitive player data is accessible only to authorised personnel on a need-to-know basis. Access rights are regularly reviewed, updated, and revoked where no longer required.

Regular Security Audits

The Company conducts periodic security audits, vulnerability assessments, and technical reviews to identify, assess, and mitigate potential risks relating to unauthorised access, data breaches, system vulnerabilities, and other security threats.

Data Backups

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Regular backups of player data and other critical records are maintained to ensure data availability, continuity of operations, and restoration in the event of system failure, data corruption, technical disruption, or data loss.

4.3 Compliance with Data Protection Laws

This compliance framework ensures that personal data is processed lawfully, fairly, transparently, and securely.

Lawful Basis for Processing

Personal data is processed only where there is an appropriate lawful basis under applicable data protection laws, including the GDPR. The lawful grounds for processing may include the following:

Consent

The Company obtains the player's consent where required, including for certain marketing communications, optional data processing activities, or the processing of special categories of personal data, where applicable.

Contractual Necessity

Personal data may be processed where necessary for the performance of a contract with the player, including account registration, provision of gaming services, account management, processing of transactions, and communication with the player regarding the use of the platform.

Legal Obligation

Certain personal data is processed in order to comply with applicable legal and regulatory obligations, including know-your-customer (KYC), anti-money laundering (AML), responsible gaming, fraud prevention, record-keeping, and reporting requirements.

Legitimate Interests

The Company may process personal data where necessary for its legitimate interests, provided that such interests are not overridden by the rights and freedoms of the player. This may include fraud prevention, platform security, service improvement, customer support, internal analytics, risk management, and operational monitoring.

Data Minimisation

The Company collects and processes only the personal data that is necessary for the provision of its services, compliance with legal obligations, protection of players, and operation of the platform. Personal data that is no longer required is securely deleted, anonymised, or retained only where continued storage is required by applicable law or regulatory obligations.

Data Subject Rights

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The Company respects the rights of players in relation to their personal data, including the right to access, rectify, erase, restrict processing, object to processing, and request data portability, where applicable. Players may exercise these rights by contacting the Company through the designated communication channels. Requests are reviewed and handled in accordance with applicable data protection laws, identity verification requirements, and any legal or regulatory limitations.

4.4 Player Consent and Data Rights

Consent

Before collecting and processing personal data, the Company provides players with clear and transparent information regarding the categories of data collected, the purposes of processing, the lawful basis for processing, and the manner in which the data will be used. Where consent is required, including for marketing communications or other optional processing activities, players must provide specific and informed consent.

Players may withdraw their consent at any time by contacting customer support or using any available consent management tools provided by the platform. Withdrawal of consent does not affect the lawfulness of processing carried out before such withdrawal.

Data Rights

Players have the following rights in relation to their personal data, subject to applicable legal and regulatory limitations:

Access

Players have the right to request access to the personal data held about them and to obtain information about how such data is being processed.

Rectification

Players have the right to request the correction of inaccurate, incomplete, or outdated personal data.

Erase

Players may request the deletion of their personal data where applicable, including where the data is no longer necessary for the purposes for which it was collected, unless the Company is required to retain such data under applicable law, regulatory obligations, AML/KYC requirements, responsible gaming obligations, or dispute resolution purposes.

Restriction

Players have the right to request the restriction of processing of their personal data in specific circumstances, including where the accuracy of the data is contested or where processing is no longer necessary but the data is required for the establishment, exercise, or defence of legal claims.

Data Portability

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Where applicable, players may request to receive their personal data in a structured, commonly used, and machine-readable format and may request that such data be transferred to another controller, where technically feasible.

Withdrawal of Consent

Players may withdraw their consent to the processing of personal data at any time where processing is based on consent. However, withdrawal of consent may affect the availability of certain services, communications, or platform features that depend on such consent, including marketing communications or optional personalisation features.

Complaints

If players believe that their data protection rights have been violated, they may submit a complaint to the Company through the designated contact channels. Players may also have the right to lodge a complaint with the relevant data protection supervisory authority in the European Union, Curaçao, or another applicable jurisdiction, depending on their place of residence and the applicable legal framework.

5. Visual and User Interface Elements

5.1 Overview of the User Interface (UI) Design

The User Interface (UI) of the Company's platform is designed to provide an intuitive, user-focused, and operationally efficient interaction model in line with industry standards applicable to online gaming platforms. The interface is structured to ensure clear visual hierarchy, logical navigation, responsive functionality, and ease of use, while also supporting the Company's regulatory, compliance, and player protection obligations.

The UI is organised into four primary structural components:

Persistent Left-Side Vertical Navigation Menu

The left-side vertical navigation menu serves as the primary access point to the main platform sections, including Casino, Live Dealers, Crash Games, Sports, Tournaments, and User Profile areas. The menu remains consistently accessible across the platform and adapts its functionality depending on the user's authorisation status.

The navigation structure is designed to provide rapid access to core services while applying appropriate restrictions where required, including restrictions on gameplay initiation, bet placement, account actions, or access to certain features where the user is not authorised, verified, or eligible.

Top Header Panel

The top header panel is positioned in the upper section of the interface and contains key user-related functions and account information. For guest users, the header displays Registration and Login options. For authorised users, it displays relevant account information, including User ID, account balance components, Main Balance, Casino Bonus, Sports Bonus, Free Bets, Pincoins, and direct access to the cashier interface.

The header remains persistent throughout the platform and updates dynamically based on user activity, account status, balance changes, and available functionality.

Dynamic Main Content Area

The main content area functions as the central workspace of the platform and dynamically adjusts depending on the selected section, user status, and applicable platform logic. It may display promotional

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banners, game categories, carousels, tournament listings, detailed game pages, promotions, user profile sections, account settings, and other context-specific content.

This area may also adapt based on the user's authorisation status, geolocation, account restrictions, and regulatory requirements, ensuring that region-specific games, promotions, tournaments, and offers are displayed only where permitted.

Footer Section

The footer contains static informational resources and compliance-related links, including Terms and Conditions, AML/KYC policies, Responsible Gaming information, Privacy Policy, support contacts, and social media links. It may also include a language selection tool, allowing users to update the platform interface language in real time.

The footer remains accessible to users and provides access to key legal, regulatory, and support information required for transparency and compliance.

Geolocation-Based Access Controls

The platform incorporates geolocation-based access controls to support compliance with applicable local laws and jurisdictional restrictions. Where access to gaming services is restricted in a particular jurisdiction, the standard homepage may be replaced with a dedicated restriction notice.

In such cases, interactive elements, including games, registration, login, deposits, and bet placement, may be disabled. Essential static elements, such as legal documents, footer links, responsible gaming information, and support contact details, may remain accessible where appropriate.

Visual Design and Responsiveness

The platform uses a dark-themed visual interface with high-contrast accent colours to ensure clarity of interactive elements, readability, and visual consistency across the gaming environment. The design takes into account accessibility considerations, including contrast and legibility principles aligned with WCAG 2.1 standards where applicable.

The interface is fully responsive and is designed to maintain functional consistency across desktop and mobile devices, different screen sizes, operating systems, and supported browsers.

Contextual and Dynamic Interactions

The UI also supports contextual and dynamic interactions, including:

Modal Windows and Pop-Ups

Modal windows and pop-ups may be used for user authentication, error notifications, bonus claim prompts, verification requests, responsible gaming notices, and other user actions requiring focused attention.

Dynamic Banners and Carousels

Promotional banners and carousel elements may be displayed within the main content area and may vary depending on user status, location, promotional eligibility, and applicable regulatory restrictions.

Real-Time Interactive Components

Certain UI components may update in real time, including account balances, bonus balances, bet status, countdown timers, tournament information, game availability, and cashier-related information.

Restricted Access Logic

The platform applies restricted access logic to modify the availability of certain actions and features based on user authorisation status, KYC verification status, responsible gaming restrictions, geolocation, account limitations, and other regulatory or operational controls.

5.2 Description of Interactive Elements

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The Company's gaming platform is designed to provide a clear, intuitive, and user-friendly interface that enables players to access all available services efficiently while maintaining transparency and compliance with applicable regulatory requirements.

Interactive elements are consistently presented throughout the platform and are designed to support convenient navigation, secure account management, and responsible gaming.

The principal interactive elements include:

- User registration and account login forms;
- Player profile and account management dashboard;
- Deposit, withdrawal, and transaction management interfaces;
- Navigation menus for Casino, Live Casino, Sportsbook (where applicable), Promotions, Responsible Gaming, Help Centre, and Player Account;
- Search and filtering tools allowing players to locate games by provider, category, popularity, or other available criteria;
- Game launch controls providing direct access to approved gaming content;
- Responsible Gaming controls enabling players to configure deposit limits, cooling-off periods, self-exclusion, and other responsible gaming measures;
- Bonus management interfaces displaying available promotions, wagering requirements, and bonus balances;
- Notification components providing important operational, financial, regulatory, and promotional information;
- Customer Support access through live chat, email, and other available communication channels.

Each interactive element is designed to provide immediate visual feedback following user actions, reducing the likelihood of operational errors and improving overall usability.

Critical player actions, including deposits, withdrawals, account changes, Responsible Gaming settings, and acceptance of Terms and Conditions, require explicit user confirmation before processing.

Error messages, validation prompts, and system notifications are displayed in a clear and understandable manner, enabling players to identify and correct input errors before transactions are completed.

Interactive components are regularly reviewed during usability and quality assurance testing to ensure continued functionality, accessibility, consistency, and compliance with internal quality standards.

5.3 Visual Design and Style

The visual design of the Company's platform is intended to provide a consistent, modern, and accessible user experience while supporting transparency, operational efficiency, and responsible gaming principles.

The interface follows a consistent visual hierarchy that enables players to easily distinguish primary actions, navigation elements, informational content, and regulatory notices.

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The design principles applied throughout the platform include:

- consistent page layouts and navigation structures;
- clearly identifiable action buttons and interactive controls;
- readable typography and appropriate font sizing;
- sufficient colour contrast to enhance readability and accessibility;
- consistent use of icons and graphical elements;
- responsive layouts supporting desktop and mobile devices;
- logical grouping of related information and functionality;
- clear presentation of balances, wagers, winnings, transaction history, and account information.

The platform provides players with transparent access to all material information before participating in gaming activities, including game rules, applicable terms and conditions, bonus requirements, account balances, and transaction confirmations.

Mandatory regulatory information, including Responsible Gaming resources, privacy information, Terms and Conditions, licensing details, age restrictions, and customer support information, is displayed in clearly accessible locations throughout the platform.

Visual indicators are used where appropriate to distinguish completed actions, pending transactions, warnings, errors, and informational messages.

The interface is designed to minimise user confusion by maintaining consistent terminology, predictable navigation behaviour, and uniform presentation across all supported products and services.

The Company periodically reviews the visual design as part of its Quality Assurance programme to ensure compatibility with current browsers, mobile devices, accessibility requirements, and evolving operational needs, while maintaining compliance with applicable regulatory standards.

6. Technical Infrastructure and Security

6.1 System Architecture Overview

The Company's gaming platform is built on a secure, scalable, and highly available technical architecture designed to support continuous operation, regulatory compliance, and the secure delivery of online gaming services.

The platform consists of multiple integrated components that operate together to provide gaming, payment processing, customer account management, regulatory compliance, and operational monitoring.

The principal architectural components include:

- Web and mobile application interfaces for player access;
- Application servers responsible for business logic and transaction processing;

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- Database servers storing player accounts, gaming activity, financial transactions, and operational records;
- Gaming integrations with licensed third-party game providers through secure API connections;
- Payment gateway integrations supporting deposits and withdrawals through approved payment service providers;
- KYC, AML, fraud prevention, and Responsible Gaming systems integrated into the player lifecycle;
- Administrative and back-office systems supporting customer support, compliance, finance, reporting, and operational management;
- Monitoring, logging, and alerting systems providing continuous supervision of infrastructure performance and operational status.

The infrastructure follows a layered architecture separating presentation, application, and database services to improve security, scalability, maintainability, and fault isolation. Access between system components is controlled through secure communication channels, network segmentation, authentication mechanisms, and role-based access controls.

System availability is supported through infrastructure redundancy, continuous monitoring, load balancing where applicable, and proactive capacity management to maintain stable platform performance during varying operational loads.

All critical operational events, system activities, player transactions, and administrative actions are recorded through centralised logging mechanisms to support auditability, regulatory reporting, incident investigation, and operational oversight.

6.2 Server Locations and Data Storage Compliance

The Company maintains its operational infrastructure using secure hosting facilities that comply with applicable regulatory, security, and operational requirements.

Critical operational records, including player identification data, gaming transactions, financial transactions, Responsible Gaming records, AML/KYC documentation, audit logs, and other regulatory information, are stored in infrastructure designed to ensure confidentiality, integrity, availability, and continuous regulatory access.

Where required by applicable Curaçao legislation and the Curaçao Gaming Authority (CGA), critical records are hosted within a Tier-IV certified data centre physically located in Curaçao.

The hosting infrastructure is designed to provide:

- high availability;
- infrastructure redundancy;
- fault tolerance;
- continuous monitoring;
- secure storage;
- disaster recovery capability;
- environmental protection.

The platform utilises enterprise virtualisation technologies and redundant storage systems that provide resilience against hardware failures while supporting business continuity objectives.

Critical operational data is retained in accordance with applicable regulatory retention requirements and

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internal record management procedures. Data retention schedules are periodically reviewed to ensure continued compliance with legal and regulatory obligations.

Storage infrastructure is protected through multiple layers of physical and logical security controls, including restricted access, environmental monitoring, redundancy mechanisms, and continuous infrastructure supervision.

6.3 Data Security Protocols and Encryption

The Company implements a comprehensive information security framework designed to protect player information, operational data, financial records, and technical infrastructure against unauthorised access, disclosure, alteration, or destruction.

Security controls are based upon recognised information security principles, including confidentiality, integrity, availability, accountability, and least-privilege access.

The primary security measures include:

- encryption of sensitive information during transmission using secure communication protocols;
- encryption of sensitive data stored within production systems where appropriate;
- role-based access control ensuring employees have access only to information required for their responsibilities;
- multi-level authentication mechanisms for administrative systems;
- network segmentation separating critical operational systems from external services;
- continuous monitoring of infrastructure, applications, and security events;
- vulnerability assessments and periodic security reviews;
- malware protection and endpoint security controls;
- firewall protection and intrusion prevention mechanisms;
- secure audit logging of administrative and security-related activities.

Passwords and authentication credentials are managed in accordance with the Company's Information Security Policy. Password complexity, periodic password changes, account lockout controls, and authentication monitoring are implemented to reduce the risk of unauthorised access.

Security events, system anomalies, and suspicious activities are continuously monitored and investigated through established incident management procedures.

Information assets are classified according to their sensitivity, and appropriate technical and organisational safeguards are applied based on the assigned classification.

The Company periodically reviews its security controls to ensure continued effectiveness against evolving cyber security threats, operational risks, and regulatory requirements.

6.4 Emergency Recovery and Business Continuity Plan

The Company maintains documented Business Continuity and Disaster Recovery procedures to ensure that critical gaming operations can continue or be restored within acceptable timeframes following significant operational

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disruptions.

The Business Continuity framework is designed to minimise operational interruptions resulting from hardware failures, software defects, cyber security incidents, communication failures, power outages, natural disasters, or other unexpected events.

Business continuity planning includes:

- identification of critical business processes;
- documented disaster recovery procedures;
- regular backup of critical operational data;
- redundancy of essential infrastructure components;
- restoration procedures for applications and databases;
- incident response and escalation procedures;
- communication plans for internal stakeholders and external service providers;
- periodic testing and review of recovery procedures.

Backup procedures are performed at predefined intervals and include player records, gaming transactions, financial information, compliance documentation, audit logs, and system configuration data.

Backup data is securely protected against unauthorised access and maintained in geographically resilient infrastructure that complies with applicable regulatory requirements.

Recovery procedures are periodically tested to verify that backup data can be successfully restored and that critical services can resume within the Company's operational recovery objectives.

Following any significant operational incident, the Company conducts a post-incident review to identify root causes, evaluate the effectiveness of the recovery process, implement corrective actions, and strengthen future resilience.

The Business Continuity and Disaster Recovery programme is reviewed periodically and updated whenever material changes occur within the Company's infrastructure, business processes, regulatory obligations, or technology environment.

7. Responsible Gaming

7.1 Implementation of Responsible Gaming Policies

The Company is committed to maintaining responsible gaming practices and providing players with appropriate tools and information to manage their gaming activity in a safe and controlled manner. The Company's responsible gaming framework is designed to reduce the risks associated with excessive or harmful gambling and to ensure that gaming remains a controlled and recreational form of entertainment.

The Company regularly reviews and updates its responsible gaming policies, procedures, and player protection measures to ensure continued compliance with applicable regulatory requirements, including those established by the Curaçao Gaming Authority, as well as recognised international standards. Responsible gaming forms part of the Company's broader commitment to player protection, transparency, fair treatment, and the promotion of a secure gaming environment.

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7.2 Self-Exclusion and Limit Setting Tools

To support players who may experience difficulties in controlling their gambling activity, the Company provides self-exclusion and cooling-off tools. These measures are designed to help players manage their gaming behaviour, take breaks from gambling where necessary, and reduce the risk of harmful or excessive gambling.

Self-Exclusion

Players who wish to take an extended break from gambling may activate the self-exclusion option. This feature prevents the player from accessing their account and participating in gambling activities for a selected period.

Available self-exclusion periods include:

- 1 year;
- 3 years;
- 5 years;
- 10 years;
- lifetime exclusion.

Once self-exclusion is activated, the player's account is locked, and the player is unable to access the account, deposit funds, place bets, or participate in gambling activities until the selected exclusion period has expired. Self-exclusion cannot be cancelled or reversed during the selected period. Where a player selects lifetime exclusion, the exclusion is permanent.

Cooling-Off Period

The cooling-off period allows players to take a temporary break from gambling. During the cooling-off period, the player is unable to make deposits, place bets, or participate in gambling activities.

Available cooling-off periods include:

- 24 hours;
- 7 days;
- 1 month;
- 3 months.

The cooling-off period may be activated directly through the player's account settings. Once activated, the cooling-off period cannot be terminated prematurely by the player.

7.3 Player Protection Measures

The Company has implemented a range of player protection tools to help players manage their gambling activity and maintain control over their gaming behaviour.

Session Time Limits

Players may set limits on the amount of time they spend on the platform during each gaming session. This tool is intended to encourage regular breaks, reduce the risk of prolonged gambling activity, and support responsible gaming behaviour.

Deposit Limits

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Players are encouraged to set deposit limits that define the maximum amount they may deposit into their account within a specified period. Deposit limits help players manage their spending, maintain financial control, and reduce the risk of excessive gambling.

7.4 Monitoring and Identifying Problem Gambling Behaviors

Through monitoring tools and behavioural analytics, the Company may identify patterns of activity that could indicate potential signs of problematic or harmful gambling behaviour. The monitoring process may include the review of the following indicators:

- frequency and duration of gaming sessions;
- deposit amounts and deposit frequency;
- changes in gambling behaviour, including increased time spent on the platform or increased amounts wagered;
- repeated or unusual use of responsible gaming tools, including requests for self-exclusion or cooling-off periods.

Where such patterns are identified, the Responsible Gaming Officer or another designated member of the responsible gaming team may contact the player to offer support, provide information on available responsible gaming tools, and discuss appropriate measures to help the player maintain control over their gambling activity.

The Company also encourages players to proactively seek assistance if they notice changes in their gambling behaviour, experience difficulty controlling their gaming activity, or believe that gambling may be negatively affecting their wellbeing, finances, or personal circumstances.

7.5 Employee Training on Responsible Gaming

All employees involved in customer support, player communication, and player-facing operations receive training on responsible gaming practices. The training is designed to ensure that relevant employees understand how to identify, respond to, and escalate potential responsible gaming concerns in an appropriate and timely manner.

Employee training covers, among other matters:

- identifying potential signs of problematic or harmful gambling behaviour;
- assisting players with the use of responsible gaming tools, including limits, cooling-off periods, and self-exclusion;
- supporting players in managing their gaming activity in a responsible and controlled manner;
- escalating responsible gaming concerns to the Responsible Gaming Officer or designated internal team where further review is required;
- providing players with information about external support organisations and professional assistance services where they seek help in relation to gambling-related harm or addiction.

The Company ensures that such training is reviewed and updated periodically to reflect applicable regulatory requirements, internal procedures, and recognised responsible gaming standards.

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8. Terms & Conditions

Terms&Conditions - <https://bullchance.com/terms-and-conditions>

Dispute Resolution Policy - <https://bullchance.com/dispute-resolution-policy/>

AML&KYC Policy - <https://bullchance.com/aml-and-kyc-policy>

Self-Exclusion Policy - <https://bullchance.com/Self-Exclusion-Policy>

Privacy Policy - <https://bullchance.com/Privacy-Policy>

Responsible Gaming Policy - <https://bullchance.com/Responsible-gaming>

9. Dispute Resolution

9.1 Procedures for Handling Player Complaints and Disputes

To ensure that all complaints are handled effectively, fairly, and consistently, the Company has established a clear and structured procedure for receiving, reviewing, investigating, and resolving player complaints.

Submitting a Complaint

Players may submit a complaint through the dedicated online complaint form available on the platform or by contacting the support team by email. The complaint should include sufficient information to allow the Company to review the matter properly, including the player's full name, account number or user ID, a clear description of the issue being disputed, and any relevant supporting documentation, such as screenshots, transaction records, correspondence, or other evidence.

Complaint Acknowledgement

The Company will acknowledge receipt of the complaint within one week of receiving it, using email or another appropriate communication channel. The acknowledgement will confirm that the complaint has been received, explain the next steps in the complaint-handling process, and provide an estimated timeframe for review and resolution where possible.

9.2 Access to Transaction Data for Dispute Resolution

Deposit and Withdrawal History

The Company maintains records of the player's financial transactions on the platform, including deposits, withdrawals, pending transactions, payment method details, transaction dates, transaction statuses, amounts, currencies, and any related payment references.

Account Activity

The Company maintains logs of relevant account activity, including gameplay activity, bet placements, account access events, changes to account settings, responsible gaming tool usage, verification status updates, and other actions performed through the player's account.

Bonus and Promotional Transactions

The Company maintains records relating to bonus and promotional activity, including bonus claims, promotional eligibility, wagering requirements, bonus balances, bonus expiry dates, fulfilment of bonus conditions, and any issues or disputes connected with promotional offers.

Players may request access to relevant transaction and account records by contacting the support team through the designated communication channels. Such requests will be reviewed and processed within a reasonable timeframe, subject to identity verification, data protection requirements, and any applicable legal or regulatory limitations.

9.3 Steps for Escalating and Resolving Issues

The following steps are followed to ensure that all complaints are reviewed and addressed appropriately:

1. Initial Review and Resolution

Upon receipt of a complaint, the support team conducts an initial review to assess the nature of the issue, verify the relevant account and transaction information, and determine whether the matter can be resolved at the first level of support. Where necessary, the support team works with the relevant internal departments to investigate the complaint and resolve it as efficiently and fairly as possible.

2. Escalation to Management

If the complaint cannot be resolved at the initial support level, the matter is escalated to senior management or the designated complaints handling team for further review. This may involve a more detailed investigation, review of system records, transaction history, communication logs, game records, payment information, or consultation with relevant third-party service providers or technical experts, where appropriate.

3. Alternative Dispute Resolution (ADR)

If the player remains dissatisfied with the outcome of the internal complaint resolution process, the player may be informed of the possibility to refer the matter to an independent Alternative Dispute Resolution (ADR) provider, where applicable. The ADR provider offers an independent review of the complaint and may assist in resolving the dispute between the player and the Company. Relevant information regarding the ADR process, including contact details and submission requirements, is made available to the player at this stage.

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4. Regulatory Escalation

Where a player believes that the Company has breached applicable regulatory requirements, the player may be advised of the possibility to escalate the matter to the Curaçao Gaming Authority (CGA), where appropriate. Regulatory escalation may be relevant where the complaint concerns potential non-compliance with licensing, responsible gaming, AML/KYC, data protection, or other regulatory obligations. The CGA may review regulatory matters within its competence; however, individual gambling disputes may remain subject to the applicable internal complaints procedure and ADR process.

9.4 Timeframes for Resolution

The following timeframes apply to the complaint and dispute resolution process:

Initial Acknowledgement

The Company will acknowledge receipt of the complaint within one week of receiving it. The acknowledgement will confirm that the complaint has been received and will provide the player with an explanation of the complaint-handling process, including the next steps and the expected timeframe for review.

Complaint Review and Resolution

The Company will conduct an initial review of the complaint and provide a response within four weeks of receipt. Where the complaint is complex, requires additional information, or involves review by third-party service providers, payment providers, game suppliers, or technical teams, this period may be extended by an additional four weeks. In such cases, the Company will notify the player in writing of the extension and the reason for the additional review period.

Final Determination

Once the review has been completed, the Company will provide the player with a final written determination. The final determination will set out the outcome of the complaint, the reasons for the decision, and any corrective action or resolution offered, where applicable.

If the complaint cannot be resolved through the Company's internal complaint-handling process, the player will be informed of any available options to pursue the matter further, including referral to an Alternative Dispute Resolution (ADR) provider or escalation to the competent regulatory authority, where applicable.

10. The digital records kept of specific critical information about players, their gaming transactions, and their financial transactions, which must be kept available to the CGA at all times on a server of a Tier-IV certified data center registered in Curaçao.

The Company ensures that digital records containing critical operational, player, gaming, and financial information are maintained securely and remain continuously accessible to the Curaçao Gaming Authority (CGA), where required. Such records include, at a minimum:

- personal identification and account information of players;

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- detailed records of game sessions, including timestamps, game types, game outcomes, wagers placed, and related gaming activity;
- financial transaction records, including deposits, withdrawals, bonus credits, adjustments, and other account balance movements.

All such data is hosted in Curaçao through a recognised Tier-IV certified provider with a physical data centre located in Curaçao.

Hosting and Infrastructure Specifications

The platform's backend systems and databases are hosted by the provider in the Curaçao Public Cloud environment, which is built on Nutanix Hyper-Converged Infrastructure and VMware vSphere virtualisation.

This environment provides high-availability clusters, SSD-accelerated storage, redundancy, and fault-tolerant configurations to support continuous operation, system resilience, and ongoing data accessibility.

The data centre maintains relevant international certifications, including ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, and PCI DSS, supporting compliance with recognised standards for information security, cloud security, privacy protection, and secure payment data handling.

The infrastructure also includes security and operational support measures such as DDoS protection, Web Application and API Protection (WAAP), access monitoring, and role-based access control to protect the integrity, confidentiality, and availability of stored data.

Data Access and Regulatory Oversight

The Company retains relevant digital records in accordance with the minimum retention periods, auditability standards, and accessibility requirements established by the Curaçao Gaming Authority and applicable laws.

Backup solutions, including Veeam Backup & Restore or equivalent technologies, are used to support data protection and recovery. Backups may include image-level and application-aware backups stored locally within the same certified data centre, enabling recovery at the virtual machine, file, or item level where required.

These measures are intended to ensure that critical records remain secure, recoverable, auditable, and accessible for regulatory oversight, operational continuity, and compliance purposes.

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11. Compliance with Curacao Licensing Requirements

11.1 Curacao Gaming License Compliance Overview

The Company is committed to complying with the regulatory requirements of the Curaçao Gaming Authority (CGA) and maintaining the integrity, transparency, and accountability of its gaming operations. The Company ensures that its gaming activities, customer interactions, financial transactions, technical systems, and player protection measures are conducted in accordance with applicable standards of fairness, security, responsible gaming, and regulatory compliance.

The Company has established this Operations Manual to document the procedures, controls, and responsibilities governing the operation of the platform. The Manual is reviewed and updated periodically to ensure continued alignment with the requirements of the CGA, applicable Curaçao gaming laws, and relevant international regulatory standards.

The Manual includes detailed information on key areas of the platform's operations, including:

Games of Chance

A description of the games offered on the platform, including applicable rules, payment methods, betting limits, payout structures, software providers, game mechanics, and outcome-determining elements.

Quality Control and Monitoring

The procedures and methods used to periodically test, monitor, and assess the quality, fairness, technical stability, and proper functioning of the platform and the games offered.

Data Management

The procedures for collecting, processing, storing, protecting, and retaining player data, including personal, transactional, gaming, and financial records, in accordance with applicable data protection and regulatory requirements.

Player Protection

The responsible gaming measures implemented by the Company, including self-exclusion options, cooling-off periods, deposit and session limits, behavioural monitoring, player support mechanisms, and procedures for assisting players who may be at risk of gambling-related harm.

Dispute Resolution

The procedures for receiving, reviewing, escalating, and resolving player complaints and disputes, including the use of internal complaint-handling processes and referral to independent dispute resolution mechanisms where applicable.

11.2 Mandatory Reporting and Documentation to CGA

Amendment Reports

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In accordance with Article 5.9 of the LOK, any amendments made to the Operations Manual must be reported to the Curaçao Gaming Authority (CGA). This includes, but is not limited to, changes relating to the platform's gaming operations, payment systems, technical and security measures, data management procedures, responsible gaming practices, complaint handling processes, or any other operational area covered by the Manual.

Reporting Schedule

Amendment reports are submitted to the CGA twice per year, by 15 January and 15 June, or within any other timeframe required by applicable regulatory instructions.

Contents of Amendment Reports

The amendment report includes:

- a summary of all changes made to the Operations Manual since the previous report;
- the updated version of the Operations Manual reflecting the relevant amendments;
- an explanation of how the changes relate to the Company's operational procedures and compliance with the applicable requirements under the LOK;
- any supporting information or documentation required to demonstrate continued compliance with CGA regulatory expectations.

The Company ensures that all amendments are properly documented, internally reviewed, and retained for audit and regulatory inspection purposes.

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Incident Reports

Incident reports must be submitted to the Curaçao Gaming Authority (CGA) within 24 hours of the Company becoming aware of any significant incident that may affect the integrity of the games, the security of player data, the reliability of the platform, or player trust in the operation.

The following types of incidents fall within this reporting obligation:

Gaming Security Breaches

Any actual or suspected security breach affecting player personal data, gaming records, game integrity, system access, or other sensitive operational information. The incident report must describe the nature of the breach, the affected systems or data, the potential impact, and the measures taken or planned to contain, mitigate, and remediate the breach.

Equipment or Software Failures

Any loss, damage, malfunction, outage, or failure of critical equipment, systems, software, infrastructure, or game-related technology that affects the Company's ability to offer games or maintain normal platform operations. The report must include details of the issue, its operational impact, the affected services, and the corrective or recovery actions taken.

Fraud or Criminal Behaviour

Any suspected or confirmed fraudulent activity, criminal conduct, collusion, manipulation, unauthorised access, money laundering-related concern, or other unlawful behaviour by players or third parties that may affect the operation, integrity, or security of the platform.

Threats to Responsible Gaming or Public Trust

Any event, conduct, system failure, or operational issue that may jeopardise the responsible, reliable, secure, and verifiable operation of the platform or undermine public confidence in the fairness, integrity, or transparency of the Company's gaming services.

The Company ensures that all reportable incidents are documented, internally escalated, investigated, and remediated in accordance with applicable regulatory requirements and internal incident management procedures.

Player Transaction Reports

The Company is required to maintain and submit detailed reports relating to player transactions, where required by the Curaçao Gaming Authority (CGA) and applicable regulatory obligations. These reports are intended to support transparency, auditability, financial monitoring, and regulatory oversight of player account activity.

Such reports may include the following information:

Total Amounts of Transactions

The total value of player transactions processed through the platform, including deposits, withdrawals, refunds, adjustments, bonus credits, and other relevant account balance movements, where applicable.

Nature of Transaction

Information identifying whether each transaction represents a credit to or debit from the player's account, including the transaction type, purpose, date, amount, currency, status, and related account balance impact.

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Payment Instruments

Information relating to the payment methods used for player transactions, including payment channel, payment provider, transaction reference, and any unique identifiers linked to the payment account or payment instrument, where applicable and permitted under data protection and payment security requirements.

Player Complaints and ADR Reports

In accordance with Article 5.10 of the LOK and the CGA Player Complaints Policy, the Company is required to maintain and submit regular reports relating to player complaints and disputes, including complaints resolved internally and those referred to Alternative Dispute Resolution (ADR) mechanisms.

These reports are intended to support regulatory oversight, transparency, complaint monitoring, and assessment of the effectiveness of the Company's dispute resolution procedures. The reports may include the following information:

Total Number of Complaints

The total number of complaints submitted by players during the relevant reporting period, broken down by complaint category, such as transaction-related issues, responsible gaming matters, technical problems, account access issues, bonus disputes, game-related complaints, or other relevant categories.

Resolution Outcomes

Information on the outcome of complaints, including the number of complaints resolved in favour of the player, resolved in favour of the Company, rejected, withdrawn, or still under review.

Complaints Referred to ADR

The number of complaints escalated to an Alternative Dispute Resolution provider, together with information on the status and outcome of those disputes, where available.

Pending Complaints

The number of unresolved complaints remaining open at the end of the reporting period, including their current status, age, category, and expected next steps for review or resolution.

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- **Reporting Schedule:** These reports are submitted twice a year by January 15 and June 15, and must be retained for a minimum of five years.

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