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**Version:** 1.1

**KYC and Privacy Policy**

**Operator:** NGX N.V./betcapital.com

**Introduction**

NGX N.V., a limited liability company registered in Curaçao and licensed by the Curaçao Gaming Authority (CGA) under the National Ordinance on Games of Chance (LOK), places the privacy and security of our clients at the forefront of our operations. This KYC and Privacy Policy outlines the types of information we collect, how we process and protect it, and the rights you have regarding your personal data. This policy applies to all data processing activities—both online and offline—related to the services provided through our website betcapital.com and is designed to ensure compliance with CGA standards, including anti-money laundering (AML) and responsible gaming requirements. For any questions or further information, please contact us at info@betcapital.com.

**Consent**

- **Agreement:** By registering an account or using our services, you explicitly consent to this KYC and Privacy Policy and its terms.
- **Withdrawal:** You may withdraw consent at any time by contacting us, though this may result in account suspension or closure if data processing is required for legal or operational purposes.

**Information We Collect**

- **Registration Data:**
  - Name, address, email address, telephone number, and date of birth to verify identity and age per CGA requirements.
  - Proof of identity (e.g., passport, driver's license, national ID) and proof of address (e.g., utility bill) for KYC/AML compliance.
- **Contact Data:**
  - Additional details (e.g., phone number, message contents, attachments) if you contact us directly.
- **Transactional Data:**
  - Payment method details, deposit/withdrawal records, and source of funds information to prevent fraud and comply with AML regulations.
- **Usage Data:**

- Browsing activity, IP address, device information, and pages visited, collected via cookies and similar technologies.
- **Purpose Clarity:**
  - We explain why specific information is needed at the point of collection (e.g., identity verification, fraud prevention).

## **How We Use Your Information**

- **Service Delivery:**
  - Provide, operate, and maintain the Website and gaming services.
- **Enhancement:**
  - Improve, personalize, and expand our offerings based on usage analysis.
- **Communication:**
  - Contact you for customer service, updates, or promotional purposes (opt-out available).
- **Compliance and Security:**
  - Detect and prevent fraud, money laundering, and underage gambling per CGA mandates.
  - Verify identity and eligibility for gaming activities.
- **Development:**
  - Innovate new products, features, and functionalities based on user insights.

## **Site Cookies and Web Beacons**

- **Usage:**
  - Cookies store preferences, track visited pages, and optimize user experience based on browser type.
- **Management:**
  - You may disable cookies via browser settings; detailed guidance is available on browser websites.
- **Consent:**
  - A cookie consent banner appears upon first visit, allowing you to accept or customize preferences, per CGA transparency standards.

## Third-Party Privacy Policies

- **Scope:**
  - This policy does not cover third-party advertisers, payment processors, or linked websites.
- **Recommendation:**
  - Review their privacy policies for details on practices and opt-out options.
- **Processors:**
  - Third-party processors (e.g., payment providers) are vetted for CGA-compliant data security standards.

## Data Protection Rights

- **Rights Under CGA and GDPR Alignment:**
  - **Access:** Request copies of your personal data (small fee may apply).
  - **Rectification:** Correct inaccurate or incomplete data.
  - **Erasure:** Request deletion of your data, subject to legal retention obligations (e.g., AML records).
  - **Restriction:** Limit processing under specific conditions (e.g., disputed accuracy).
  - **Objection:** Oppose processing for marketing or profiling purposes.
  - **Portability:** Transfer your data to another entity or yourself in a structured format.
- **Response Time:**
  - We respond to requests within 30 days, per CGA and international standards.
- **Exercise Rights:**
  - Contact [support@betcapital.com](mailto:support@betcapital.com) with your request, including identity verification for security.

## Children's Information

- **Protection:**
  - We do not knowingly collect personal data from individuals under 18, aligning with CGA underage gambling prevention rules.

- **Parental Action:**

- If a child's data is detected, contact us at [support@betcapital.com](mailto:support@betcapital.com); we will promptly delete it from our records.

- **Guidance:**

- Parents/guardians are encouraged to monitor online activity and use parental control tools.

## **KYC (Know Your Customer) Compliance**

- **Purpose:**

- Verify identity, age, and source of funds to comply with CGA AML and responsible gaming requirements.

- **Process:**

- Mandatory submission of ID and address proof at registration or prior to withdrawals exceeding.
- Enhanced due diligence for high-risk profiles (e.g., politically exposed persons) or unusual transaction patterns.

- **Retention:**

- KYC data retained for 5 years post-account closure, per CGA regulatory mandates.

## **Data Security**

- **Measures:**

- Encryption (e.g., SSL/TLS), firewalls, and secure servers protect data during transmission and storage.

- **Access Control:**

- Limited to authorized personnel trained in CGA-compliant data handling.

- **Breach Response:**

- Immediate notification to you and the CGA within 72 hours of a detected breach affecting personal data.

## **International Data Transfers**

- **Scope:**

- Data may be transferred outside the European Economic Area (EEA) to Curaçao or other jurisdictions for processing.

- **Safeguards:**

- Transfers use CGA-approved mechanisms (e.g., standard contractual clauses) to ensure equivalent protection.

## **Policy Review and Updates**

- **Frequency:**

- Reviewed annually or as required by CGA updates to maintain compliance.

- **Notification:**

- Changes communicated via email and Website notices, effective 30 days post-announcement unless immediate action is legally required.

## **CGA Compliance Enhancements (2025)**

- **AML Integration:**

- Explicit KYC procedures tied to AML, including source-of-funds verification for transactions may be required.

- **Transparency:**

- Clear consent prompts and data use explanations at collection points, per CGA standards.

- **Security:**

- Mandatory encryption and breach reporting aligned with CGA's heightened data protection expectations.

- **Retention:**

- 5-year retention period post-account closure, reflecting CGA record-keeping rules.