

Proyecto Pro B.V.

**Responsible
Marketing Policy**

relevant to

Curaçao License

Contents

Introduction.....	3
Advertising Codes/Industry codes.....	3
Marketing of offers/displaying terms.....	3
Social Responsibility.....	4
Responsible Gaming.....	4
Appeal to children and under 18s.....	5
Young people in marketing.....	5
Third Parties/affiliates.....	5
Data Protection and e-privacy.....	6

Introduction

We are committed to maintaining global compliance with responsible advertising and marketing standards across all advertising media, as set out below in the Proyecto Pro B.V. Responsible Marketing Policy. We aim to be a leader in the area of responsible marketing, particularly with regard to promoting responsible gambling behaviors across the industry as a whole. In particular, we abide by any regulatory requirements and guidance in each jurisdiction in which we market our products.

Our Responsible Marketing Policy states that we do not direct marketing communication to minors and this includes removing any content before log in that could appeal to children. Although not an exhaustive list, the main marketing channels covered by the Policy include:

- Television
- Radio
- Print
- Cinema
- Digital media
- Social Media
- Email
- Mobile (SMS and Push Notifications)
- Consumer relationship marketing
- Proyecto Pro owned websites and blogs
- Affiliate websites and blogs
- Sponsorships
- Promotions
- Events

To ensure consistent and effective implementation, detailed internal guidelines have been developed. We are committed to monitoring and measuring our adherence to this Policy across all the markets we serve.

Advertising Codes/Industry codes

As an overriding principle, all marketing communications must comply with local advertising codes. They should be so designed to market products to persons of legal participating age in a responsible and appropriate manner. Marketing communications should not incite or condone illegal behavior, excessive betting or undermine healthy lifestyles.

Marketing of offers/displaying terms

Marketing communications should be framed so as to not abuse the trust of consumers or exploit their lack of experience or knowledge.

Relevant factors likely to affect consumers decisions should be communicated in such a way and at such a time that consumers can take them into account i.e. marketing communications must make clear within the main body of the advert the significant bonus limitations and qualifications.

Proyecto Pro B.V. will ensure that all terms and conditions of the marketing communications offer/bonus will be clear and unambiguous and will be clearly available to customers across all advertising channels.

Terms must be fair and ensure customers have the ability to withdraw their own funds without restriction or being locked into “wagering restrictions”. Customers must also be able to easily distinguish between their own funds and any bonus funds they have been given.

Social Responsibility

Marketing communications should not use themes, images, symbols, or portrayals likely to cause widespread harm or offense, including derogatory or demeaning. If marketing communication is to be used in more than one country, the cultural and religious sensitivities of all the countries involved should be respected.

Marketing communications should respect human dignity and should not incite or condone any form of discrimination, including that based on race, national origin, religion, gender, age, disability, or sexual orientation.

Marketing communications should not appear to condone or incite violent, unlawful, or antisocial behavior. Proyecto Pro B.V. will not advertise with, or be associated with any advertising linked to any illegal websites, including illegal movie/download websites.

Marketing communications should not contain claims or representations that suggest individuals can attain social or professional success or status as a result of betting/gaming.

Marketing communications should not be associated with violent, aggressive, hazardous, illegal or anti-social behavior. They should not be associated with illegal activity of any kind.

Marketing communications should not depict betting/gaming in a manner associated with the attainment of adulthood or the ‘rite of passage’ to adulthood.

Proyecto Pro B.V. will not advertise with, or be associated with advertising linked to any pornographic sites. Sexualized or otherwise indecent images, together with images objectifying women should not be used.

Responsible Gaming

Marketing should not portray excessive or irresponsible participation by individuals of legal age. ‘Excessive and irresponsible’ refers to the amount bet/gambled and to the way in which it is done.

Proyecto Pro B.V. will take all necessary actions to ensure suspended/frozen, closed, excluded and self-excluded account holders will not receive marketing communications.

Marketing communications of betting/gaming should not be addressed to at-risk groups. Where possible all Marketing communications must incorporate relevant jurisdictional responsible gaming messages and ages and also include the “Bet the responsible Way” logo.

Appeal to children and under 18s

Any marketing, that could be appealing to children, must not be visible until logged in.

Marketing communications should be intended only for persons of legal participation age in the jurisdiction.

Marketing communications should not be intended to primarily appeal to minors (i.e. making it more attractive to minors than to persons of legal age).

Promotions, prizes, or games linked to marketing betting/gaming, including on digital media, should not be open to minors.

Marketing communications of betting/gaming should be placed only in media where it is reasonably expected to meet applicable audience composition targets (i.e. where the audience composition can reasonably be expected to meet the agreed target of people that are not minors).

Young people in marketing

Marketing communications should not include a child or young person under 25 years old, or anyone who could be perceived to be under 25.

Third Parties/affiliates

Proyecto Pro B.V. will be responsible for the actions of its contracted third parties and ensure that any contracts entered into with such third parties, including affiliates, will comply with the Responsible Gambling Policy. A code of conduct and all relevant regulatory requirements and guidance in each jurisdiction in which we market our products is to be made available to all active affiliates.

Proyecto Pro B.V. will undertake appropriate measures of monitoring their activities to ensure their compliance with the terms of the contract.

Data Protection and e-privacy

Proyecto Pro B.V. will comply with all relevant data protection regulations, including the General Data Protection Regulation and ensure that any data processors who assist in marketing are subject to appropriate contractual controls.

All marketing carried out by, or on behalf of, Proyecto Pro B.V., must comply with the standards of Privacy and Electronic Communication Regulation.