

Know Your Customer (KYC) Policy

Gaming Company – In Application Phase

Name Company: Proyecto Pro B.V.

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1. Purpose

This KYC Policy outlines the proposed procedures and internal controls Gaming Company intends to implement upon successful licensing by the Curaçao Gaming Authority (CGA). The policy aims to support regulatory compliance, prevent financial crime, and promote responsible gaming once operations commence.

2. Scope

This policy will apply to all customers of Gaming Company upon launch and will guide the compliance and operations teams in customer onboarding, verification, and monitoring procedures.

3. Legal and Regulatory Framework

The KYC framework is designed to comply with:

- Curaçao Gaming Authority (CGA) standards for B2C operators
- National Ordinance on the Identification when Rendering Services (NOIS)
- National Ordinance on the Prevention and Combating of Money Laundering and Terrorist Financing (NOISCF)
- FATF Recommendations and international AML/CTF best practices

Upon approval, the company will adhere to any updated regulatory directives issued by the CGA.

4. Planned Customer Due Diligence (CDD) Measures

4.1 Basic Verification

Prior to allowing gaming activity, deposits, or withdrawals, we will collect and verify:

- Full Name
- Date of Birth (18+ age requirement)
- Nationality and Country of Residence
- Proof of Identity (government-issued ID, passport, or driver's license)
- Proof of Address (utility bill, bank statement, or rental agreement – dated within 90 days)
- Contact Information (email, phone number)

4.2 Enhanced Due Diligence (EDD)

EDD will be applied in the following cases:

- Politically Exposed Persons (PEPs)
- Players from jurisdictions considered high-risk by FATF or CGA
- Suspicious or irregular transaction patterns
- Players exceeding financial thresholds (as defined in risk framework)

EDD steps may include:

- Verification of source of funds and/or wealth
- Request for supporting documents (e.g., payslips, contracts)
- Internal compliance review before account access is restored or continued

5. Risk-Based Approach and Player Profiling

The company will adopt a risk-based approach to classify customers into risk tiers: Low, Medium, or High. This classification will influence the level of verification and ongoing monitoring.

Risk assessment criteria include:

- Jurisdiction of residence
- Financial behavior (deposit frequency and volume)
- Transaction history and gaming behavior
- Source of funds

6. Sanctions & Screening Procedures

Upon onboarding and on a regular basis thereafter, the following checks will be conducted:

- Sanctions lists (UN, OFAC, EU, etc.)
- Politically Exposed Person (PEP) databases
- Adverse media screening

Third-party KYC/AML screening tools may be integrated to support compliance efficiency.

7. Recordkeeping and Data Retention

Upon licensing and launch, the company will implement secure data storage practices in line with Curaçao data protection regulations and GDPR. All customer records related to KYC and transactional behavior will be retained for a minimum of five (5) years after the termination of the relationship.

8. Future Monitoring and Reporting Systems

The company plans to implement a combination of automated and manual monitoring systems post-launch to:

- Detect suspicious transaction patterns

- Track large deposits or withdrawals
- Identify signs of account misuse or money laundering
- Generate alerts for compliance review and reporting

Suspicious activities will be escalated to the designated Compliance Officer and, if required, reported to the FIU Curaçao.

9. Employee Training (Pre- and Post-Licensing)

All relevant staff will be trained on:

- AML/CFT obligations under Curaçao law
- Internal KYC procedures and escalation steps
- Tools for detecting suspicious activity and supporting responsible gaming

Initial training will occur before launch; refresher training will be conducted annually.

10. Alignment with Responsible Gaming Practices

As part of its commitment to player protection, the company will:

- Verify age and identity before allowing gaming
- Monitor gaming behavior for risks related to problem gambling
- Offer tools like self-exclusion, session limits, and cooling-off periods
- Cooperate with responsible gaming bodies and initiatives

11. Implementation and Review

This policy will be reviewed and updated:

- Upon CGA license approval
- Annually, or in response to regulatory updates
- When new risks or compliance issues are identified

Contact (Pre-Licensing Phase):

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