

# Responsible Gaming Policy

## New Origin B.V. - ohmywin.com

**Version 2.0 - 6 June 2026**

*Drafting note: Bracketed items must be completed or confirmed before before publication on the website.*

*Language note: the English version is the authoritative version. The Spanish version is provided for the target market. If there is any discrepancy, the English version prevails.*

### Document control

| Field                            | Details                                                                                                                                                                                                       |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Legal entity                     | New Origin B.V.                                                                                                                                                                                               |
| Registered address               | Scharlooweg 39, Curaçao                                                                                                                                                                                       |
| CGA licence number               | [License Number TBD]                                                                                                                                                                                          |
| Trading names / domains          | ohmywin.com and any mirror domains operated under the New Origin B.V. licence                                                                                                                                 |
| Products offered                 | Slots, RNG Roulette, Live Roulette, Sportsbook                                                                                                                                                                |
| Target markets                   | Hispanic America / Spanish-speaking                                                                                                                                                                           |
| Languages                        | English and Spanish. English version prevails.                                                                                                                                                                |
| High-risk business model factors | Acceptance of cryptocurrencies and dedicated VIP / high-roller programme                                                                                                                                      |
| Responsible Gaming role          | Until a dedicated Responsible Gaming Manager is formally appointed, the Compliance Officer responsible for RG matters, not acting only as AML/CFT officer, is responsible for implementation and enforcement. |
| Player RG contact channels       | Email: responsiblegaming@ohmywin.com                                                                                                                                                                          |

## Contents

- Part I - English Responsible Gaming Policy
- 1. Definitions
- 2. Policy overview and scope
- 3. Mandatory requirements and governance responsibilities
- 4. Implementation schedule
- 5. Prevention of underage gambling
- 6. Player information and accessibility
- 7. Self-assessment
- 8. Behaviour tracking, player profiling and intervention
- 9. Cooling-off, self-exclusion and operator-initiated exclusion
- 10. Limits
- 11. Training and staff readiness
- 12. Consumer advertising and marketing
- 13. Enhanced Responsible Gaming measures
- 14. Record keeping, reporting and audit readiness
- Part II - Spanish Responsible Gaming Policy

# Part I - English Responsible Gaming Policy

## 1. Definitions

- **CGA:** Curacao Gaming Authority.
- **Cooling Off:** a pre-determined period that can comprise hours, days or months, set by the player, during which the player may not place any wagers whatsoever.
- **Games of Chance:** any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker.
- **LOK:** the National Ordinance on Games of Chance law of Curaçao.
- **Marketing, promotion and advertising:** all resources, messages and media that promote the operator's domains, brands, products or services. This includes, without limitation, print and other media advertising, content marketing, digital marketing and social media campaigns.
- **Mandatory Requirements:** the basic elements of a Responsible Gaming policy that must be implemented by all operators and must reflect the target markets and players of the operator.
- **Minor:** any person under the age of 18.
- **Operator:** New Origin B.V., as holder of a B2C licence from the CGA or holder of an Orange Digital Seal Certificate of Operations, as applicable.
- **Self-exclusion:** an event where a player voluntarily bars themselves from all or certain online gaming-related activities with the operator.
- **Vulnerable Person:** a person who: (1) is under eighteen years of age; (2) has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people; (3) has been banned from playing any Game of Chance either by force or at his or her own request; or (4) has been declared bankrupt.

## 2. Policy overview and scope

### 2.1 General Responsible Gaming policy

New Origin B.V. integrates Responsible Gaming principles into its business model so that online gaming remains an enjoyable form of entertainment and does not become a source of harm. This policy applies to ohmywin.com, any mirror domains, and any other brand or domain operated under the New Origin B.V. licence.

The policy sets out proactive steps and operational processes to protect Vulnerable Persons, promote responsible gambling, and mitigate or prevent problem gambling behaviour. The policy is supported by internal procedures, platform controls, staff training, monitoring, escalation and record keeping.

- A clear Responsible Gaming policy is made available to players through the Responsible Gaming Section.
- Responsible Gaming tools and information resources are made available to players.
- Monitoring mechanisms are used to detect and address potential problematic gambling behaviour.
- The operator complies with applicable regulatory reporting, audit and CGA information obligations.
- No credit is offered to players for the purpose of wagering.

This policy must be uploaded to the CGA portal for CGA evaluation and any material changes to the policy must be reported to the CGA.

### 2.2 High-risk business model accommodation

New Origin B.V. recognises that elements of its business model are higher risk because the business accepts cryptocurrencies and operates a VIP / high-roller programme. The policy therefore includes enhanced measures that suitably accommodate those high-risk elements, including enhanced KYC and source-of-funds controls where required, deposit velocity monitoring, VIP affordability and sustainability reviews, bonus review controls and direct player interaction where indicators suggest that a player may be vulnerable.

Exact quantitative alert thresholds, scoring parameters and anti-circumvention rules are maintained in internal procedures and monitoring systems. They are not published to players in order to protect the effectiveness of the controls, but they are available for Compliance review and CGA inspection upon request.

### **2.3 Non-retail model**

This policy is intended for the retail B2C online gaming model operated by New Origin B.V. Non-retail professional-player or syndicate arrangements are not part of the intended player model. If such a model is introduced, the Responsible Gaming Manager and Compliance must review and update this policy before launch.

## **3. Mandatory requirements and governance responsibilities**

The following Responsible Gaming elements are mandatory for operational compliance under the CGA framework and are implemented or tracked through the implementation schedule in this policy:

- Age verification
- Information accessibility
- Player self-assessments
- Behaviour tracking
- Cooling-off periods
- Self-exclusion
- Deposit limits
- Consumer advertising and marketing
- Training of employees

New Origin B.V. appoints a person to fulfil the Responsible Gaming role in the organisation. Unless and until a dedicated Responsible Gaming Manager is appointed, a Compliance Officer responsible for RG matters, and not acting only as AML/CFT officer, is responsible for implementing and enforcing the Responsible Gaming policy.

The person fulfilling the Responsible Gaming role must provide a report to the operator's management team at least once every twelve months on the effectiveness of the policy and related operational procedures. The report must include recommendations to management on proposed operational or policy enhancements. Management must be aware of this policy and its implementation obligations.

## **4. Implementation schedule**

The Responsible Gaming Manager maintains the schedule, tracks evidence of implementation, and escalates overdue items to Compliance and management. The website, Terms and Conditions, footer, staff training, marketing controls and player tools must be aligned with this policy before publication or CGA filing.

## **5. Prevention of underage gambling**

### **5.1 Age verification**

New Origin B.V. must not allow a Minor the opportunity to participate in Games of Chance. Rigorous age verification processes are therefore implemented to ensure that all participants are of legal gambling age.

- During account registration, the player must enter their date of birth and confirm that they are over 18 by selecting a designated checkbox. The checkbox must not be pre-selected.
- Additional checks must be carried out to gain sufficient certainty that the individual is not a Minor. These may include electronic verification, payment validation, third-party or government database checks, selfie verification and other risk-based checks.
- Proof of age and identity checks must, at a minimum, include a valid government-issued ID such as a passport, national ID card or driver's licence when specified thresholds are reached and in any case prior to first withdrawal.
- Secondary verification methods may be used at the operator's discretion, but they do not replace the government-issued document requirement.

- If New Origin B.V. becomes aware that a player is a Minor, the account must be closed immediately. The operator must consider the civil-law implications, which may include the obligation to refund deposits and forfeiture of winnings, and must clearly communicate the reason for account closure to the Minor.
- Records of all age verification processes and outcomes must be maintained and made available for regulatory review.

Players and adults using shared devices are reminded in the Responsible Gaming Section to safeguard usernames, passwords, devices and payment details, particularly when minors may have access to the device.

## 6. Player information and accessibility

### 6.1 Responsible Gaming Section

New Origin B.V. must ensure that a distinct Responsible Gaming Section is available to players at all times. The RG Section must be clearly identifiable, easy to understand and accessible from the website or app.

The RG Section must include direct access to all relevant tools a player may use to manage their gaming behaviour, including self-exclusion, cooling-off, deposit limit setting and other Responsible Gaming measures.

The RG Section must display how the player may contact the operator regarding any Responsible Gaming concern:

- [responsiblegaming@ohmywin.com](mailto:responsiblegaming@ohmywin.com)

Players who contact the operator by email about RG concerns must be routed to trained customer support or Responsible Gaming staff. The contact must be recorded in the PAM system and, where indicators of risk are present, escalated under section 8.

The RG Section must be made available in English and Spanish. The English version prevails if there are discrepancies.

### 6.2 Homepage accessibility

- A clear and visible link to the RG Section must be present on the website or app homepage.
- The homepage or footer must display information on how the player may contact the operator regarding RG concerns by email.
- The homepage and footer must clearly state that gambling is prohibited for persons under 18 years of age.

### 6.3 Terms and Conditions inclusion

- The RG Section must be explicitly referenced and included within the Terms and Conditions of the website.
- The Terms and Conditions must be no more than one click away from the homepage.
- Players must be informed about the Responsible Gaming tools available, their functionality and how they can be used.

### 6.4 Footer information requirements

The footer of the homepage of the gaming website or application must contain the following essential details:

- A clear visual indication that underage gambling is prohibited, such as 18+.
- The name and registered address of the licence holder.
- The official licence number issued by the CGA.
- A statement confirming CGA regulatory oversight of the licensee's operations.
- A link to the RG Section.
- The operator's CGA digital seal.
- A direct link to one or more gambling addiction support resources such as GamCare, Gamblers Anonymous and GambleAware, together with local support resources in the target market where available.

## 7. Self-assessment

Players must be able to access a detailed record of their betting and wagering history, including timestamps of transactions, from their player account for at least the last six months. Longer periods may be requested from the operator and must be provided within 10 working days unless the operator can show that this timeframe is not reasonably achievable, in which case an extension may be requested from or granted by the CGA as appropriate.

Players are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits. New Origin B.V. provides self-assessment tools that allow players to answer questions designed to help identify potential problem gambling behaviours.

The RG Section includes or links to the Gamblers Anonymous 20-question quiz and may also include the CAGE Questionnaire adapted for gambling. Players are encouraged to answer the following questions honestly:

- C - Cut Down: Have you ever felt you should cut down on your gambling?
- A - Annoyed: Have people annoyed you by criticizing your gambling habits?
- G - Guilty: Have you ever felt guilty about your gambling?
- E - Eye-Opener: Have you ever had a morning eye-opener to steady your nerves or recover from gambling losses?

Interpreting the results:

- 0 Yes answers: low risk for gambling problems.
- 1 Yes answer: moderate risk; further assessment may be needed.
- 2 or more Yes answers: high risk; further evaluation and intervention are strongly recommended.

Any player who recognises problematic gambling behaviours through self-assessment is advised to explore the available Responsible Gaming tools, including deposit limits, cooling-off and self-exclusion, and to contact the operator by email for assistance.

## 8. Behaviour tracking, player profiling and intervention

### 8.1 Behaviour tracking objective

Active monitoring is used to detect signs of problematic gambling and to provide clear intervention strategies for high-risk players in order to mitigate harm. New Origin B.V. must not give a person who can reasonably be assumed to be a Vulnerable Person the opportunity to play Games of Chance.

The operator analyses the player's relationship with the operator holistically in order to identify at-risk individuals and take proactive steps to prevent gambling-related harm. A single monitoring factor does not necessarily, by itself, classify a player as a potential gambling addict. A determination of problematic gambling behaviour may require multiple indicators occurring simultaneously and consistently.

Behaviour tracking may be undertaken by frontline staff, including customer service representatives and VIP managers, and by technological tools, including platform features, in-game tools, rules engines, artificial intelligence or machine learning.

### 8.2 Key monitoring factors

- Deposit and wagering frequency, including sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals, including players cancelling withdrawal requests multiple times.
- A pattern of inexplicable extended play sessions.
- Unreasonably increased communication with customer support, including requests for bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools, such as continuously setting or changing deposit or loss limits or repeatedly making use of a cooling-off period.
- Players maxing out a credit card, where credit-card deposits are accepted or detected through payment data.
- Attempts to open multiple accounts to bypass deposit, loss or other limits.

### 8.3 Player profiling and risk-based assessment

New Origin B.V. establishes and maintains player profiles incorporating relevant data points to assess individual risk levels. The operator adopts a risk-based approach to determine the appropriate level of monitoring and intervention.

The player profile may include, depending on availability and legality in the relevant market: account registration information; KYC and age verification outcomes; country and language; product preferences; deposit and wagering frequency; failed deposits; withdrawal reversals; session length and time of play; customer support contacts; bonus requests;

Responsible Gaming tool use; VIP or high-roller status; cryptocurrency activity; payment methods; duplicate-account signals; affordability or sustainability information where available; and previous RG interactions.

The risk assessment assigns players to risk categories and applies proportionate monitoring:

| Risk level             | Indicative profile                                                                                                                                                            | Monitoring and intervention                                                                                                                                                      |
|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Low                    | No material RG indicators or isolated low-level indicators.                                                                                                                   | Standard automated monitoring, access to RG tools and self-assessment information.                                                                                               |
| Medium                 | One or more indicators requiring review, or increased activity not yet suggesting vulnerability.                                                                              | Enhanced monitoring, RG information message, record in PAM, review by trained staff.                                                                                             |
| High                   | Multiple indicators, repeated patterns, VIP / crypto risk factors combined with behavioural concerns, or signs of distress.                                                   | Direct RG contact, support resources, consideration of mandatory deposit limit, cooling-off suggestion without steering, temporary suspension pending assessment.                |
| Very high / Vulnerable | Behaviour reasonably suggests the player may be a Vulnerable Person, or the player is self-excluded, underage, bankrupt where known, or unable to control gambling behaviour. | Immediate protective action, direct contact where appropriate, suspension or operator-initiated exclusion, marketing suppression, duplicate-account and payment-method controls. |

The exact scoring rules, thresholds and escalation criteria are kept in internal RG procedures and the PAM / monitoring system. They must be reviewed by the Responsible Gaming Manager and Compliance and made available to the CGA upon request.

## 8.4 Structured process for player identification and intervention

New Origin B.V. follows a structured and documented process when indicators of problem gambling are identified:

- **1. Detection:** An indicator is identified by the platform, PAM alert, customer support, VIP manager, payment monitoring, duplicate-account monitoring, self-assessment, player contact or other source.
- **2. Recording:** The indicator, date, source, staff member or system source and supporting information are recorded in the PAM system.
- **3. Triage and profile review:** Trained staff review the player profile, recent behaviour and previous RG interactions to determine the risk level under the risk-based approach.
- **4. Initial intervention:** Where appropriate, the player is informed of available RG tools, such as deposit limits, cooling-off and self-exclusion options, and is directed to support resources.
- **5. Direct contact:** When behaviour reasonably suggests that the player may be a Vulnerable Person, the operator must initiate direct contact. The communication must advise the player to review the RG Section and consider using the available tools and support services. Contact may be by email or other suitable channel and must be handled by trained staff.
- **6. Escalation:** Where appropriate, the operator may apply mandatory deposit limits, temporarily suspend the account pending further assessment, or permanently exclude the player in cases of severe or persistent risk.
- **7. Follow-up:** The player's subsequent activity is monitored. Further interventions are applied if risk indicators persist or escalate.
- **8. Closure and audit trail:** All RG interactions, indicators of concern, decisions and actions taken are recorded in the PAM system and retained in accordance with section 14.

Under no circumstances may New Origin B.V. use Responsible Gaming measures as a pretext to prevent or delay legitimate player withdrawals. Protective interventions must not be misused for financial gain.

## 8.5 Procedure for players identified as Vulnerable Persons

If a player is identified, or can reasonably be assumed, to be a Vulnerable Person, New Origin B.V. must take protective action proportionate to the risk and must not provide the player with further opportunity to gamble where this would breach the LOK or CGA requirements.

The procedure is as follows:

- Immediately record the concern and supporting indicators in the PAM system.
- Escalate the case to the Responsible Gaming Manager or trained RG staff.
- Initiate direct contact where appropriate, advising the player to review the RG Section and consider tools and support services.

- Do not offer bonuses, free play, incentives or reassurance designed to keep the player gambling.
- Consider mandatory deposit limits, account suspension, cooling-off, self-exclusion information or operator-initiated exclusion depending on the risk and legal basis.
- Suppress marketing where required, including for self-excluded players and players subject to operator-initiated exclusion.
- Review duplicate-account and payment-method controls to prevent circumvention.
- Ensure that any remaining balance and legitimate withdrawal request is handled in accordance with civil law, AML/CFT requirements and section 8.4.

## 9. Cooling-off, self-exclusion and operator-initiated exclusion

New Origin B.V. implements and maintains tools that empower players to manage their gambling behaviour. Cooling-off and self-exclusion must be made available to players at all times via the RG Section of the website or app. Players must not be guided or influenced toward one option over another. No interference, bonuses or reassurances may be provided. Players must be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable.

### 9.1 Cooling-off

Cooling-off is a short-term temporary restriction from gambling activities. New Origin B.V. adopts a protective duration-based cooling-off model. The restriction applies to all gambling activity on the brand where it is initiated and any mirror domains of that brand. If additional brands are operated under the same licence, the operator may also offer an all-brand option. Vertical-specific cooling-off is not used unless enabled in the product; this avoids steering and is more protective because the restriction applies to all gambling activity on the selected brand scope.

Cooling-off options must include:

- Duration options: 24 hours, 7 days, 1 month and 3 months. The player must actively select the cooling-off duration. No duration option shall be pre-selected.
- Marketing opt-out option. This option must be offered neutrally and must not be pre-selected.
- Where brand or vertical options are made available, the player must select preferences by tick-box and tick-boxes must not be pre-checked.

Activation and implementation requirements:

- Cooling-off must be self-executed by the player online with very limited operator intervention.
- In exceptional cases, the player may request cooling-off by email at [responsiblegaming@ohmywin.com](mailto:responsiblegaming@ohmywin.com) only where the online tool is temporarily unavailable or the player is unable to complete the process online due to a technical issue, and the elected options must be enabled within 24 hours.
- Restrictions must take effect immediately and be enforced according to the player's selections.
- The operator must not question the player's decision, offer bonuses or promotions to encourage continued play, or delay or complicate activation.
- For 1-month or 3-month cooling-off periods, the operator may use one brief online neutral confirmation, for example: "You wish to cool off for one month. Please confirm".
- Player funds remain accessible for withdrawal.
- The account remains active, but gambling features are disabled for the selected period.
- Marketing materials must not be sent during the cooling-off period if the player has opted out, and no bonuses, free play or incentives may be offered during the cooling-off period.
- The account must be automatically reactivated after the selected cooling-off period expires. No further action is required by the player.

### 9.2 Self-exclusion

Self-exclusion is a long-term, irrevocable exclusion from all gambling activity under the operator's licence. New Origin B.V. must offer players the option to self-exclude from all gambling activity.

Self-exclusion must have the following elements:

- Duration options: 1 year, 3 years, 5 years, 10 years and lifetime.

- Brand scope: all brands and domains operated under the New Origin B.V. licence.
- Vertical scope: all gambling activity.
- Marketing: automatic opt-out from direct marketing and advertising.
- The player selects the duration by tick-box. All other elements are automatic. Tick-boxes must not be pre-selected.
- The player must be able to initiate and complete self-exclusion fully online without requiring email communication or operator approval.
- In exceptional cases, the player may request self-exclusion via email at [responsiblegaming@ohmywin.com](mailto:responsiblegaming@ohmywin.com) only where the online tool is temporarily unavailable or the player is unable to complete the process online due to a technical issue, and the elected option must be enabled within 24 hours.

Activation and implementation requirements:

- The restrictions must take effect immediately and be enforced according to the selected duration.
- The operator must not question the player's decision, offer bonuses or promotions to encourage continued play, or delay or complicate activation.
- The operator may implement one simple online verification check to ensure the player understands the consequences. The wording must be neutral, for example: "You have chosen to self-exclude for 5 years. Please confirm".
- The account is closed and the player can no longer log in.
- Robust measures must be in place to identify, where reasonably possible, duplicate accounts and to prevent self-excluded individuals from creating new accounts under different credentials.
- Civil-law implications must be considered. Ante-post bets may need to be voided and refunded, subject to AML/CFT regulations and applicable law.
- Where in-running tournaments or similar gameplay are offered, the player may need to complete any tournament that is in progress at the time of self-exclusion; no further wagering may be allowed.
- Contributions to progressive jackpots made before self-exclusion remain in situ, but the player is no longer entitled to participate in the jackpot after self-exclusion is in effect.
- No direct marketing or advertising may be sent to the player during the self-exclusion period.

Reactivation after self-exclusion: after the exclusion period ends, the player must request unblocking in writing by email. The written request may be prompted when the player attempts to log in after expiry or may be sent unprompted through official customer support channels. Reactivation must not be initiated by the operator restarting communications with the player. Self-exclusion is irreversible and irrevocable for the selected duration.

Where possible and in line with applicable regulations, any payment method known directly by the operator and used by a self-excluded player must be blocked for future use during the exclusion period to prevent circumvention.

### 9.3 Operator-initiated exclusion

New Origin B.V. may exclude a player as a high-risk intervention measure if the player displays problematic gambling behaviour or attempts or engages in criminal activities through the operator's platform. The operator may not exclude a player solely because of the amount of the player's winnings.

Operator-initiated exclusions must be formally documented. Records must be kept for at least five years and made available to the CGA upon request. The operator must ensure that operator-initiated exclusion is not used to prevent or delay legitimate player withdrawals.

## 10. Limits

### 10.1 Deposit limits

New Origin B.V. must offer players tools to control their gambling activity by setting deposit limits. Players can set limits on the total amount they deposit over a daily, weekly or monthly period, allowing them to tailor restrictions to their individual gaming habits.

- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.
- If the option to change limits exists while a limit is already in place, a request to increase the severity of a deposit limit, such as lowering the limit, takes effect immediately.

- A request to decrease the severity of a deposit limit, such as raising or removing a limit, is subject to a 24-hour waiting period before implementation.
- Resolved or unresolved wagers made before the deposit limit is set remain unaffected by the limit.
- For cryptocurrency deposits, deposit limits apply using the fiat equivalent calculated under the operator's payment and wallet procedures at the time the deposit is credited or otherwise measured.
- System, payment, AML/CFT and risk-based internal limits may apply in addition to player-set deposit limits. Exact operational thresholds are maintained internally and are not displayed unless required by product design or law.

The operator may apply mandatory deposit limits to a player's account as an RG intervention under section 8.4.

## 10.2 Other limits

In line with the target player, target market and the operator's risk profile, New Origin B.V. may implement additional limits, including loss limits, time limits and wager limits. These tools are enhanced measures and may be offered to players or applied as risk-based interventions where appropriate.

Exceptions to limits and exclusions may arise in relation to active wagering, including unresolved ante-post bets, in-running tournaments or similar gameplay. Restrictions must be honoured immediately except for the active gameplay or wager. On completion of the relevant tournament, wager or event, the restriction applies and no further wagering is permitted before completion.

## 11. Training and staff readiness

New Origin B.V. must train customer service and Responsible Gaming staff to handle player interactions professionally and effectively. Staff with customer interaction, including customer support, VIP staff and marketing personnel, must receive RG training before handling relevant duties and at least annually thereafter.

Training must cover at least:

- Recognising signs of gambling distress, including agitation, aggression or financial desperation.
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate support resources and RG tools.
- Escalating potential Vulnerable Person cases and recording interactions in the PAM system.
- Marketing and bonus restrictions applicable to at-risk, cooling-off, self-excluded or operator-excluded players.
- The prohibition on using RG measures to delay legitimate withdrawals.

Training completion records, training materials and assessment outcomes must be retained and made available for Compliance or CGA review.

## 12. Consumer advertising and marketing

New Origin B.V. must not engage in irresponsible advertising. This applies to all marketing, promotion and advertising, including affiliate marketing, social media, influencers, sponsorships, ambassadors, representatives and any paid placement or advertisement.

The following rules apply:

- **No targeting of Vulnerable Groups:** Marketing, including visual content, must not directly target Vulnerable Persons or groups likely to include Vulnerable Persons.
- **No portrayal of gambling as an investment:** Advertising must not promote gambling as a way to achieve financial success, generate income or solve financial difficulties.
- **No misrepresentation of skill versus chance:** Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
- **No emotional manipulation:** Advertising must not portray gambling as a substitute for financial, emotional or mental well-being.
- **No minors:** Marketing materials must not feature minors or depict minors engaging with gambling content.
- **No explicit content:** Adverts, messaging and communications must not contain overt sexual or pornographic imagery or suggestion.

- **No unrelated harmful behaviours:** There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction or enhanced attractiveness.
- **Transparent bonus conditions:** Bonuses and promotions must be communicated transparently with clear terms and conditions.
- **No excessive gambling through bonuses:** Bonuses must not be used to encourage excessive gambling.
- **Third-party responsibility:** The operator is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors and social media influencers, including wording and visual representations, where the activity is paid placement or advertisement.
- **Third-party awareness and adherence:** Any contracted third party must be made aware of this RG policy and must be required to adhere to it.
- **Responsible Gaming messaging:** All advertising must include a clearly visible Responsible Gaming message or slogan, such as "Play Responsibly - 18+" and, for Spanish materials, "Juega con responsabilidad - 18+".

Marketing approval procedures must require Compliance review of high-risk campaigns, VIP communications, bonuses, affiliate materials and influencer content. Marketing suppression lists must be applied for self-excluded players, operator-excluded players and any player for whom suppression is required by RG intervention or law.

## 13. Enhanced Responsible Gaming measures

Because New Origin B.V. accepts cryptocurrency and operates a VIP / high-roller programme, enhanced Responsible Gaming measures are included in this policy. Enhanced measures are also considered where the operator identifies a disproportionately high number of at-risk players, self-exclusions, cooling-off actions or other indicators.

### 13.1 Internet filtering tools and shared-device precautions

To further prevent underage gambling, the RG Section reminds adults that they should take precautions when sharing devices with minors, including safeguarding usernames, passwords, devices and payment details.

The RG Section may provide links to third-party software that can help restrict access to gambling websites. Examples of website-blocking and gambling-site blocking tools include:

- BetBlocker - [betblocker.org](https://betblocker.org)
- GamBlock - [gamblock.com](https://gamblock.com)
- Gamban - [gamban.com](https://gamban.com)

These tools are provided for player information. The operator does not control third-party tools and is not responsible for their availability, pricing, functionality or suitability.

### 13.2 Direct player interaction

New Origin B.V. may employ automatic or manual pop-up notifications in response to concerning behaviours. These notifications must include a link or route for the player to contact a trained Responsible Gaming professional.

When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Person, the operator must initiate direct contact. This communication must advise the player to review the Responsible Gaming area and consider using the available tools and support services. The communication must not include bonuses, incentives or language designed to keep the player gambling.

### 13.3 Enhanced high-risk controls for cryptocurrency and VIP players

The following enhanced controls apply on a risk basis to cryptocurrency, VIP and high-roller activity:

- Enhanced KYC, source-of-funds or source-of-wealth checks where required by AML/CFT, affordability, sustainability or risk procedures.
- Deposit velocity and sudden activity-increase alerts, including fiat-equivalent monitoring for crypto deposits.
- VIP manager training on RG indicators, bonus restrictions and escalation duties.
- Mandatory RG review before high-value or repeated VIP bonus offers where risk indicators are present.
- Periodic affordability or sustainability review for VIP players, with frequency based on risk category.
- Escalation to Compliance and RG staff if VIP, crypto or high-roller activity coincides with behaviour-tracking indicators.

### 13.4 Reality check

Reality-check measures may be implemented as enhanced RG tools without compromising the user experience. Where used, they must be fit for purpose and may include:

- A real-time session timer that remains visible while the player is logged in.
- A real-time clock in the player's time zone.
- Periodic pop-up reminders or prompts about session duration.
- Player-activated reality checks that can be customised to activate at specific time intervals.

When triggered, a customised reality check must suspend play momentarily and require the player to confirm that they have read the message before resuming play. It should offer the option to end the session or continue playing. Custom messages should clearly indicate how long the player has been playing and display the player's winnings and losses during that period.

## 14. Record keeping, reporting and audit readiness

New Origin B.V. must maintain accurate and retrievable records supporting this policy. Records must be kept in accordance with applicable retention periods and, where the CGA framework specifies a minimum, for at least five years.

Records include, without limitation:

- Age verification checks and outcomes.
- Player transaction history and account statements.
- Self-assessment availability and player-facing content.
- Behaviour-tracking alerts, indicators, risk assessments and interventions.
- All RG interactions initiated by the player or operator.
- Cooling-off, self-exclusion and operator-initiated exclusion records.
- Duplicate-account and payment-method controls linked to self-exclusion or exclusion.
- Training completion records for customer support, VIP, RG and marketing staff.
- Marketing approvals, affiliate acknowledgements and third-party RG policy adherence records.
- Annual management reports and policy review records.
- Material change notifications to the CGA.

The Responsible Gaming Manager must review this policy at least annually and following any material change in products, target markets, payment methods, VIP programme, regulatory requirements, supervisory communications or material regulatory developments. Material changes must be reported to the CGA.

## Part II - Política de Juego Responsable en Español

En caso de discrepancia entre esta versión y la versión inglesa, prevalecerá la versión inglesa.

### 1. Definiciones

- **CGA:** Curacao Gaming Authority.
- **Periodo de pausa o Cooling-off:** periodo predeterminado de horas, días o meses elegido por el jugador durante el cual el jugador no puede realizar apuestas.
- **Juegos de azar:** cualquier juego en el que uno o más jugadores, a cambio del pago de dinero o valor monetario, compiten por premios en dinero o valor monetario y cuyo resultado está determinado por el azar, o por una combinación de azar y conocimiento o habilidad del jugador, sin posibilidad de influir significativamente en el resultado, incluyendo apuestas deportivas y poker.
- **LOK:** la Ley Nacional de Juegos de Azar de Curaçao.
- **Marketing, promoción y publicidad:** todos los recursos, mensajes y medios que promocionan dominios, marcas, productos o servicios del operador, incluyendo publicidad en medios, marketing de contenidos, marketing digital y campañas en redes sociales.
- **Requisitos obligatorios:** los elementos básicos de una política de Juego Responsable que deben ser implementados por todos los operadores y reflejar los mercados y jugadores objetivo del operador.
- **Menor:** cualquier persona menor de 18 años.
- **Operador:** New Origin B.V., como titular de licencia B2C de la CGA o titular de un Orange Digital Seal Certificate of Operations, según corresponda.
- **Autoexclusión:** evento por el cual un jugador se excluye voluntariamente de todas o determinadas actividades de juego online con el operador.
- **Persona vulnerable:** persona que: (1) es menor de 18 años; (2) no tiene, o tiene insuficiente, control sobre su conducta de juego y por ello es, o amenaza con convertirse en, adicta a uno o más Juegos de azar, pudiendo causar daño a sí misma o a otras personas; (3) ha sido excluida de participar en cualquier Juego de azar por imposición o a petición propia; o (4) ha sido declarada en quiebra.

### 2. Visión general y alcance de la política

New Origin B.V. integra principios de Juego Responsable en su modelo de negocio para que el juego online siga siendo una forma de entretenimiento y no una fuente de daño. Esta política se aplica a ohmywin.com, a sus dominios espejo y a cualquier otra marca o dominio operado bajo la licencia de New Origin B.V.

La política establece medidas proactivas y procesos operativos para proteger a Personas vulnerables, promover el juego responsable y mitigar o prevenir conductas de juego problemático. New Origin B.V. no ofrece crédito a los jugadores con fines de apuesta.

La política se publicará o enlazará en la Sección de Juego Responsable, se remitirá a la CGA cuando corresponda y sus cambios materiales serán comunicados a la CGA.

New Origin B.V. reconoce factores de mayor riesgo en su modelo de negocio, incluyendo la aceptación de criptomonedas y un programa VIP / high-roller. Por ello se aplican medidas reforzadas como controles de KYC y origen de fondos cuando proceda, alertas de velocidad de depósito, revisiones de asequibilidad y sostenibilidad para VIP, control de bonos e interacción directa con jugadores cuando los indicadores sugieran vulnerabilidad.

### 3. Requisitos obligatorios y responsabilidades de gobernanza

Los elementos obligatorios de Juego Responsable bajo el marco de la CGA son:

- Verificación de edad
- Accesibilidad de la información
- Autoevaluaciones del jugador
- Seguimiento de conducta

- Periodos de pausa o cooling-off
- Autoexclusión
- Límites de depósito
- Publicidad y marketing al consumidor
- Formación de empleados

New Origin B.V. designa una persona responsable de las funciones de Juego Responsable. Hasta que exista un responsable dedicado, un Compliance Officer responsable de Juego Responsable, que no actúe únicamente como AML/CFT officer, implementará y hará cumplir esta política.

La persona responsable de Juego Responsable informará al equipo directivo al menos una vez cada doce meses sobre la efectividad de la política y de los procedimientos operativos relacionados, incluyendo recomendaciones de mejora.

## 4. Calendario de implementación

El Responsable de Juego Responsable mantiene el calendario, conserva evidencia de implementación y escala a Compliance y dirección cualquier incumplimiento o retraso.

## 5. Prevención del juego de menores

New Origin B.V. no debe permitir que un Menor participe en Juegos de azar. Por ello se implementan procesos rigurosos de verificación de edad.

- Durante el registro, el jugador debe introducir su fecha de nacimiento y confirmar que es mayor de 18 años seleccionando una casilla designada. La casilla no debe estar preseleccionada.
- Deben realizarse comprobaciones adicionales para obtener certeza suficiente de que la persona no es Menor, incluyendo verificación electrónica, validación de pago, bases de datos de terceros o gubernamentales, selfie verification u otros controles basados en riesgo.
- La verificación de edad e identidad debe incluir, como mínimo, un documento oficial válido como pasaporte, documento nacional de identidad o permiso de conducir al alcanzar los umbrales definidos y, en todo caso, antes del primer retiro.
- Los métodos secundarios de verificación pueden utilizarse a discreción del operador, pero no sustituyen el requisito de documento oficial.
- Si el operador tiene conocimiento de que un jugador es Menor, la cuenta debe cerrarse inmediatamente. Se considerarán las implicaciones civiles, que pueden incluir la devolución de depósitos y la anulación de ganancias, y se comunicará claramente el motivo del cierre.
- Se mantendrán registros de todos los procesos de verificación de edad y sus resultados para revisión regulatoria.

La Sección de Juego Responsable recordará a los adultos que deben proteger nombres de usuario, contraseñas, dispositivos y datos de pago cuando compartan dispositivos con menores.

## 6. Información al jugador y accesibilidad

New Origin B.V. mantendrá en todo momento una Sección de Juego Responsable claramente identificable, comprensible y accesible desde la web o la app. Esta sección incluirá acceso directo a las herramientas relevantes, incluyendo autoexclusión, cooling-off, límites de depósito y otras medidas de Juego Responsable.

La Sección de Juego Responsable debe indicar cómo puede contactar el jugador con el operador por cuestiones de Juego Responsable:

- Email: [responsiblegaming@ohmywin.com](mailto:responsiblegaming@ohmywin.com).

Los contactos por email relativos a Juego Responsable serán gestionados por personal formado, registrados en el sistema PAM y escalados conforme a la sección 8 cuando existan indicadores de riesgo.

La web o app debe incluir un enlace claro y visible a la Sección de Juego Responsable desde la página principal. Los Términos y Condiciones deben referenciar explícitamente dicha sección y estar a no más de un clic de la página principal.

El pie de página debe incluir: indicación visual 18+; nombre y domicilio del titular de la licencia; número de licencia CGA; declaración de supervisión regulatoria por la CGA; enlace a la Sección de Juego Responsable; sello digital CGA; y enlaces a recursos de ayuda como GamCare, Gamblers Anonymous, GambleAware y recursos locales disponibles en el mercado objetivo.

## 7. Autoevaluación

El jugador debe poder acceder desde su cuenta a un registro detallado de su historial de apuestas y juego, incluyendo marcas temporales de transacciones, de al menos los últimos seis meses. Periodos más largos podrán solicitarse al operador y deberán proporcionarse en un plazo de 10 días laborables salvo que no sea razonablemente posible, en cuyo caso podrá solicitarse o aplicarse una extensión conforme al criterio de la CGA.

La Sección de Juego Responsable incluirá o enlazará herramientas de autoevaluación, como el test de 20 preguntas de Gamblers Anonymous y/o el cuestionario CAGE adaptado al juego. Se anima al jugador a responder con honestidad:

- C - Reducir: ¿Alguna vez ha sentido que debería reducir su actividad de juego?
- A - Molestia: ¿Le ha molestado que otras personas critiquen sus hábitos de juego?
- G - Culpa: ¿Alguna vez se ha sentido culpable por su actividad de juego?
- E - Eye-opener: ¿Alguna vez ha necesitado jugar por la mañana para calmar sus nervios o recuperarse de pérdidas de juego?

Interpretación orientativa:

- 0 respuestas afirmativas: bajo riesgo.
- 1 respuesta afirmativa: riesgo moderado; puede ser necesaria una evaluación adicional.
- 2 o más respuestas afirmativas: alto riesgo; se recomienda evaluación e intervención adicionales.

El jugador que reconozca conductas problemáticas mediante autoevaluación debe revisar las herramientas disponibles, incluyendo límites de depósito, cooling-off y autoexclusión, y puede contactar con el operador por email.

## 8. Seguimiento de conducta, perfilado e intervención

New Origin B.V. utiliza monitorización activa para detectar indicios de juego problemático y aplicar estrategias de intervención para jugadores de mayor riesgo. El operador no debe permitir jugar a una persona que razonablemente pueda considerarse Persona vulnerable.

El análisis es holístico. Un indicador aislado no clasifica necesariamente a un jugador como jugador problemático; la determinación puede requerir múltiples indicadores simultáneos y consistentes. El seguimiento puede realizarse por personal de atención al cliente, managers VIP y herramientas tecnológicas, incluyendo reglas de plataforma, IA o machine learning.

Factores clave de monitorización:

- Frecuencia de depósitos y apuestas, incluyendo aumentos repentinos e inexplicables.
- Transacciones fallidas repetidas por fondos insuficientes.
- Cancelación o reversión repetida de solicitudes de retiro.
- Patrón de sesiones de juego prolongadas e inexplicables.
- Incremento irrazonable de comunicaciones con atención al cliente, incluyendo solicitudes de bonos con signos de agitación.
- Cambios frecuentes en herramientas de Juego Responsable, como modificar límites de depósito o pérdida o usar repetidamente periodos de cooling-off.
- Jugadores que alcanzan el máximo de una tarjeta de crédito, cuando se acepten o detecten depósitos con tarjeta.
- Intentos de abrir múltiples cuentas para eludir límites de depósito, pérdida u otros límites.

El operador mantiene perfiles de jugador con datos relevantes para valorar niveles de riesgo y aplica un enfoque basado en riesgo. Las categorías de riesgo son bajo, medio, alto y muy alto / vulnerable. Las reglas, umbrales y criterios exactos se mantienen en procedimientos internos y sistemas de monitorización para preservar la efectividad de los controles, y estarán disponibles para Compliance y la CGA cuando se soliciten.

Proceso estructurado de intervención: detección del indicador; registro en PAM; revisión del perfil; intervención inicial informando de herramientas y recursos; contacto directo cuando la conducta sugiera razonablemente que el jugador puede ser Persona vulnerable; escalado mediante límites obligatorios, suspensión temporal o exclusión permanente en casos severos o persistentes; seguimiento posterior; y cierre con trazabilidad completa.

Bajo ninguna circunstancia se utilizarán medidas de Juego Responsable como pretexto para impedir o retrasar retiros legítimos de jugadores.

Cuando un jugador sea identificado o pueda razonablemente considerarse Persona vulnerable, se registrará el caso, se escalará al responsable correspondiente, se iniciará contacto directo cuando proceda, no se ofrecerán bonos ni incentivos, se considerarán medidas de protección como límites, suspensión o exclusión, se bloqueará marketing cuando proceda y se revisarán controles de cuentas duplicadas y métodos de pago.

## 9. Cooling-off, autoexclusión y exclusión iniciada por el operador

Las herramientas de cooling-off y autoexclusión estarán disponibles en todo momento desde la Sección de Juego Responsable. Los jugadores no deben ser guiados ni influenciados hacia una opción u otra. No se ofrecerán interferencias, bonos ni mensajes de tranquilidad para inducir al jugador a continuar jugando.

### 9.1 Cooling-off

El cooling-off es una restricción temporal de corto plazo. New Origin B.V. adopta un modelo protector basado en duración que aplica a toda la actividad de juego en la marca donde se inicia y sus dominios espejo. Si se operan marcas adicionales bajo la misma licencia, se podrá ofrecer opción para todas las marcas. No se emplea cooling-off por vertical salvo que el producto lo habilite; aplicar la pausa a toda la actividad es más protector y reduce el riesgo de steering.

- Duraciones: 24 horas, 7 días, 1 mes y 3 meses.
- Opción de exclusión de marketing ofrecida de forma neutral y no preseleccionada.
- Activación online por el jugador, con intervención muy limitada del operador.
- En casos excepcionales, el jugador podrá solicitar cooling-off por email a [responsiblegaming@ohmywin.com](mailto:responsiblegaming@ohmywin.com) únicamente cuando la herramienta online no esté disponible temporalmente o el jugador no pueda completar el proceso online por incidencia técnica, y la opción elegida deberá activarse en un plazo de 24 horas.
- La restricción debe aplicarse inmediatamente. El operador no debe cuestionar la decisión, ofrecer bonos o promociones, ni retrasar o complicar el proceso.
- Para periodos de 1 o 3 meses podrá utilizarse una confirmación online breve y neutral.
- Los fondos permanecen disponibles para retiro. La cuenta sigue activa, pero las funciones de juego quedan deshabilitadas durante el periodo seleccionado.
- Si el jugador optó por excluirse de marketing, no recibirá comunicaciones comerciales durante el cooling-off. No se ofrecerán bonos, free play ni incentivos durante el periodo.
- La cuenta se reactivará automáticamente al finalizar el periodo elegido.

### 9.2 Autoexclusión

La autoexclusión es una exclusión de largo plazo, irrevocable durante el periodo elegido, de toda actividad de juego bajo la licencia del operador.

- Duraciones: 1 año, 3 años, 5 años, 10 años y de por vida.
- Alcance de marca: todas las marcas y dominios operados bajo la licencia de New Origin B.V.
- Alcance vertical: toda actividad de juego.
- Marketing: exclusión automática de marketing directo y publicidad.
- El jugador elige la duración por casilla. Las demás condiciones son automáticas. Las casillas no deben estar preseleccionadas.
- El jugador debe poder iniciar y completar la autoexclusión completamente online, sin email ni aprobación del operador.
- En casos excepcionales, podrá solicitarse por email a [responsiblegaming@ohmywin.com](mailto:responsiblegaming@ohmywin.com) únicamente cuando la herramienta online no esté disponible temporalmente o el jugador no pueda completar el proceso online por incidencia técnica, y la opción elegida deberá activarse en 24 horas.
- La restricción se aplica inmediatamente. El operador no debe cuestionar la decisión, ofrecer bonos o promociones, ni retrasar o complicar la activación.

- Puede utilizarse una confirmación online simple y neutral para asegurar que el jugador comprende las consecuencias.
- La cuenta se cierra y el jugador no puede iniciar sesión.
- Se aplicarán controles razonables para detectar cuentas duplicadas y evitar que una persona autoexcluida cree nuevas cuentas.
- No se enviará marketing directo ni publicidad al jugador durante la autoexclusión.

Después del fin del periodo de autoexclusión, el jugador deberá solicitar por escrito, por email, el desbloqueo de la cuenta. La reactivación no puede ser iniciada por el operador mediante el reinicio de comunicaciones comerciales. La autoexclusión es irreversible e irrevocable durante el periodo seleccionado.

Cuando sea posible y conforme a la normativa aplicable, los métodos de pago conocidos usados por un jugador autoexcluido se bloquearán durante el periodo de exclusión para evitar elusión.

### 9.3 Exclusión iniciada por el operador

New Origin B.V. puede excluir a un jugador como medida de intervención de alto riesgo cuando el jugador muestre conducta de juego problemático o intente o realice actividades criminales a través de la plataforma. No se excluirá a un jugador únicamente por el importe de sus ganancias.

La exclusión iniciada por el operador debe documentarse formalmente. Los registros se conservarán al menos cinco años y estarán disponibles para la CGA. Esta medida no se utilizará para impedir o retrasar retiros legítimos.

## 10. Límites

New Origin B.V. ofrece límites de depósito diarios, semanales y mensuales. Cuando se alcanza un límite, el jugador no puede depositar fondos adicionales hasta que se reinicie el periodo aplicable. Reducir un límite tiene efecto inmediato; aumentar o eliminar un límite queda sujeto a un periodo de espera de 24 horas. Las apuestas realizadas antes de establecer el límite no se ven afectadas.

Para depósitos en criptomonedas, los límites se aplican usando el equivalente en moneda fiat calculado conforme a los procedimientos de pagos y wallet del operador. También pueden aplicar límites de sistema, pagos, AML/CFT o riesgo. El operador puede imponer límites de depósito obligatorios como medida de intervención de Juego Responsable.

Según el mercado objetivo y perfil de riesgo, New Origin B.V. puede implementar límites adicionales, incluyendo límites de pérdidas, tiempo o apuesta. Estos son medidas reforzadas y pueden ofrecerse al jugador o aplicarse como intervención basada en riesgo.

Si un límite o exclusión afecta apuestas activas, incluyendo apuestas ante-post no resueltas o torneos en curso cuando existan, la restricción se respetará inmediatamente con excepción de la apuesta o juego activo. Al completarse, la restricción se aplicará y no se permitirán nuevas apuestas antes de dicha finalización.

## 11. Formación y preparación del personal

New Origin B.V. formará al personal de atención al cliente, Juego Responsable, VIP y marketing para gestionar interacciones con jugadores de forma profesional y eficaz, antes de asumir funciones relevantes y al menos anualmente.

- Reconocer señales de angustia por juego, incluyendo agitación, agresividad o desesperación financiera.
- Mantener conversaciones sensibles y estructuradas con jugadores en riesgo.
- Dirigir a los jugadores a recursos de ayuda y herramientas de Juego Responsable.
- Escalar casos de posible Persona vulnerable y registrar interacciones en PAM.
- Aplicar restricciones de marketing y bonos para jugadores en riesgo, en cooling-off, autoexcluidos o excluidos por el operador.
- Respetar la prohibición de utilizar medidas de Juego Responsable para retrasar retiros legítimos.

Los registros de formación y materiales se conservarán y estarán disponibles para revisión de Compliance o la CGA.

## 12. Publicidad y marketing al consumidor

New Origin B.V. no realizará publicidad irresponsable. Las reglas aplican a marketing, promociones, afiliados, redes sociales, influencers, patrocinios, embajadores, representantes y cualquier colocación o anuncio pagado.

- **No dirigirse a grupos vulnerables:** El marketing, incluyendo contenido visual, no debe dirigirse directamente a Personas vulnerables.
- **No presentar el juego como inversión:** La publicidad no debe promover el juego como forma de lograr éxito financiero, generar ingresos o resolver dificultades económicas.
- **No tergiversar habilidad frente a azar:** El marketing no debe sugerir que la habilidad puede influir en juegos basados puramente en el azar.
- **No manipulación emocional:** La publicidad no debe presentar el juego como sustituto del bienestar financiero, emocional o mental.
- **No menores:** Los materiales no deben incluir menores ni representarlos interactuando con contenido de juego.
- **No contenido explícito:** Los anuncios y comunicaciones no deben incluir imágenes o sugerencias sexuales o pornográficas explícitas.
- **No conductas dañinas no relacionadas:** No debe vincularse el juego con tabaco, drogas, alcohol, seducción o mayor atractivo.
- **Bonos transparentes:** Los bonos y promociones deben comunicarse con términos y condiciones claros.
- **No uso de bonos para fomentar juego excesivo:** Los bonos no deben utilizarse para incentivar juego excesivo.
- **Responsabilidad por terceros:** El operador es responsable de materiales entregados a afiliados, representantes, patrocinadores, embajadores e influencers cuando exista publicidad o colocación pagada.
- **Adhesión de terceros:** Todo tercero contratado debe conocer esta política y comprometerse a cumplirla.
- **Mensaje de Juego Responsable:** Toda publicidad debe incluir un mensaje visible de Juego Responsable, como "Play Responsibly - 18+" o "Juega con responsabilidad - 18+".

Los procesos de aprobación de marketing exigirán revisión de Compliance para campañas de mayor riesgo, comunicaciones VIP, bonos, materiales de afiliados e influencers. Se aplicarán listas de supresión de marketing para jugadores autoexcluidos, excluidos por el operador o sujetos a restricción.

## 13. Medidas reforzadas de Juego Responsable

Debido a la aceptación de criptomonedas y al programa VIP / high-roller, esta política incluye medidas reforzadas. También podrán aplicarse cuando se identifique un número desproporcionado de jugadores en riesgo, autoexclusiones, cooling-off u otros indicadores.

Herramientas de filtrado y dispositivos compartidos: la Sección de Juego Responsable recordará a los adultos proteger credenciales, dispositivos y datos de pago cuando compartan dispositivos con menores. También podrá incluir enlaces informativos a herramientas de bloqueo como BetBlocker - [betblocker.org](https://betblocker.org), GamBlock - [gamblock.com](https://gamblock.com) y Gamban - [gamban.com](https://gamban.com). El operador no controla dichas herramientas ni garantiza su disponibilidad, precio, funcionalidad o idoneidad.

Interacción directa: New Origin B.V. puede usar notificaciones automáticas o manuales ante conductas preocupantes. Estas notificaciones incluirán una ruta de contacto con un profesional formado en Juego Responsable. Cuando la conducta sugiera razonablemente que un jugador puede ser Persona vulnerable, el operador debe iniciar contacto directo y recomendar revisar la Sección de Juego Responsable, herramientas y servicios de ayuda, sin incluir bonos ni incentivos.

Controles reforzados para crypto y VIP: KYC reforzado y origen de fondos cuando proceda; alertas de velocidad de depósito y equivalencia fiat para crypto; formación específica para managers VIP; revisión RG antes de bonos VIP de alto valor o repetidos si hay indicadores; revisiones periódicas de asequibilidad o sostenibilidad para VIP según riesgo; y escalado a Compliance y Juego Responsable cuando actividad VIP, crypto o high-roller coincida con indicadores de conducta.

Reality check: pueden implementarse medidas como temporizador de sesión visible, reloj en la zona horaria del jugador, recordatorios periódicos sobre duración de sesión y alertas configurables por el jugador. Cuando se active un reality check personalizado, el juego se suspenderá momentáneamente, el jugador deberá confirmar lectura antes de continuar y se le ofrecerá finalizar o seguir la sesión. El mensaje debe indicar la duración de juego y las ganancias y pérdidas del periodo.

## 14. Conservación de registros, informes y auditoría

New Origin B.V. mantendrá registros precisos y recuperables de verificación de edad, historial de transacciones, autoevaluación, alertas, evaluaciones de riesgo, intervenciones, interacciones RG, cooling-off, autoexclusiones, exclusiones iniciadas por el operador, controles de cuentas duplicadas y métodos de pago, formación, aprobaciones de marketing, afiliados, informes anuales y notificaciones de cambios materiales a la CGA.

Los registros se conservarán conforme a los plazos aplicables y, cuando el marco CGA establezca un mínimo, durante al menos cinco años. El Responsable de Juego Responsable revisará esta política al menos anualmente y tras cualquier cambio material en productos, mercados objetivo, métodos de pago, programa VIP, requisitos regulatorios, comunicaciones supervisoras o cambios regulatorios materiales.

*End of document.*