

Information Security Policy

Version 1.0

StarX Software Solutions N.V.

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Livestrong Building

Curaçao

Revision History

Version #	Effective Date	Approving Official	Responsible Office	Next Review Date	Comments
1.0	Oct 28, 2025	eMoore N.V.	IT Security Team	Oct 28, 2026	-

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1. Introduction

This Information Security Policy establishes the framework for protecting the confidentiality, integrity, and availability of all data and systems within **StarX Software Solutions N.V.**, an online gaming operator licensed in Curaçao. It aims to safeguard company assets, customer data, and maintain regulatory compliance.

2. Scope

This policy applies to all employees, contractors, vendors, and third-party service providers with access to **StarX Software Solutions N.V.**'s IT resources, data, and applications.

3. Objectives

- Protect sensitive and proprietary data from unauthorized access, alteration, or disclosure.
 - Ensure the integrity and availability of gaming systems and data.
 - Minimize cybersecurity risks through proactive measures.
 - Comply with local (Curaçao) and international data protection regulations.
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4. IT Resources and Infrastructure

4.1 Hardware and Network Resources

- All servers, workstations, network devices, and communication infrastructure must be configured securely, regularly maintained, and monitored for suspicious activity.
- Hardware shall undergo routine inspections, necessary firmware, and software updates.

4.2 Software and Applications

- Only authorized software and applications approved by the IT security team may be installed and used.
- Software updates and patches must be applied promptly to fix vulnerabilities.

4.3 Access Management

- Access to IT resources is granted based on the principle of least privilege.

- Multi-factor authentication (MFA) shall be implemented for all critical systems.
 - User accounts must be unique, and sharing of credentials is prohibited.
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5. Data Uploading, Storage, and Protection

5.1 Data Uploading

- Data transfers must utilize secure protocols such as SFTP and HTTPS.
- All data uploads must be logged, verified, and monitored for integrity.

5.2 Data Storage

- Data shall be stored in secure environments not directly accessible from public networks.
- Access to stored data is limited to authorized personnel only, with clear audit trails maintained.

5.3 Data Backup and Recovery

- Regular backups of all critical data shall be performed daily, with backups stored securely in staged approach: on-site, off-site or in geographically dispersed locations in order to ensure recovery time objective (RTO).
- Backup procedures shall include verification steps to ensure data integrity and completeness.
- A disaster recovery plan shall be maintained and tested periodically.

5.4 Data Protection and Privacy

- Data must be protected from unauthorized access, modification, or destruction.
 - Personal and customer data must comply with relevant data protection laws, including GDPR and Curaçao privacy laws.
 - Data retention policies shall define how long data is stored before secure deletion. A minimum of 5 years is noted.
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6. Application Security

- All applications utilized within the organization must undergo security assessments prior to deployment.
- Applications shall be configured following security best practices, including secure coding standards, input validation, and session management.

- Regular vulnerability scans and penetration tests shall be conducted to identify and remediate security flaws.
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7. Security Incident Management

- All security incidents must be promptly reported to the IT security team.
 - An incident response plan is in place to address, contain, and remediate security breaches.
 - Post-incident reviews shall analyze root causes and implement corrective actions.
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8. Employee Responsibilities

- Employees must adhere to all security policies and procedures.
 - Security awareness training shall be conducted regularly.
 - Confidentiality agreements must be signed by all personnel handling sensitive data.
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9. Vendor and Third-Party Security

- Vendors and third-party providers with access to company systems must comply with this security policy.
 - Security assessments of vendors shall be conducted prior to engaging with them.
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10. Policy Enforcement and Review

- Compliance with this policy is mandatory; violations may result in disciplinary action.
 - The policy shall be reviewed annually or following significant changes to systems or regulations.
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11. Contact Information

For questions or security concerns, contact:

IT Security Team: fraud@pronetgaming.com

StarX Software Solutions N.V. is committed to maintaining the highest standards of information security to ensure the trust of our customers, partners, and regulatory bodies.
