

Super Awesome Gaming Alliance

T/A POWER.WIN

**KYC Customer Onboarding Policy
&
Procedures**

1. Purpose

This document defines the KYC onboarding standards, procedures and controls for SAGA T/A Power.Win our crypto-focused online casino, which operates under the Curaçao LOK regime and Curaçao Gaming Authority (CGA). It ensures our understanding and compliance with AML/CFT obligations and establishes a structured and risk-based customer verification process.

2. Regulatory Framework

- Curaçao LOK Legislation
- CGA AML/CFT Guidelines
- FATF Recommendations
- Data Protection Standards (GDPR where applicable)

3. Scope

Applies to all players, employees, compliance personnel, payment partners, and automated verification systems.

4. Onboarding Workflow

4.1 Account Creation

Collect: full name, DOB, address, email, mobile, username/password, T&C acceptance, privacy notices.

4.2 Identity Verification (KYC Level 1)

Required before deposits/crypto wallet activation.

Acceptable POI: passport, national ID, residence permit.

Verification includes biometric, liveness, and fraud-detection checks.

4.3 Address Verification (KYC Level 2)

Required before withdrawals or cumulative €2,000 deposits.

Acceptable POA: utility bill, bank statement, government correspondence.

4.4 Crypto-Specific KYC Requirements

- Deposits must originate from customer-owned wallets.
- Wallets validated through blockchain analysis, risk scoring, and Travel Rule providers.
- Source of Funds for high-risk crypto users requires proof linking wallet ownership to KYC'd exchange accounts.

5. Enhanced Due Diligence (EDD)

Triggered by:

- High-risk jurisdictions
- Rapid high-value crypto deposits
- PEP status
- Suspicious blockchain activity

EDD Evidence: proof of income, bank statements, crypto transaction histories, tax documentation.

6. Ongoing Monitoring

- Continuous blockchain analysis
- Transaction pattern screening
- VPN/proxy blocking
- Sanctions and PEP list screening
- Behavioural analytics (multi-accounting, device fingerprints)

7. Restricted & High-Risk Jurisdictions

Block: Curaçao residents, USA, UK, France, Spain, Netherlands, Australia, and sanctioned countries.

Automatic blocking of IPs, VPNs and TOR networks.

8. Payments and Withdrawals

- Withdrawals only to KYC-verified wallets/accounts.
- Crypto withdrawals require blockchain verification before release.
- Fiat off-ramps must match customer identity.

9. Account Freezing & Reporting

Freeze account when:

- falsified documents
- suspicious crypto activity
- KYC failure within the timeframe

Report suspicious activity to MLRO and CGA as required.

10. Record Keeping

- Retain KYC, AML and blockchain analysis records for a minimum of 5 years.
- Encrypt all documents and restrict internal access.

11. Data Protection

- GDPR-aligned data protection controls
- Secure encrypted storage
- Full transparency to the player regarding the use of personal data

12. Roles & Responsibilities

MLRO – AML oversight, SAR filing

Compliance Officer – KYC supervision

KYC Team – document review

Payments Team – withdrawal compliance checks

13. Customer Communication

Provide clear instructions on KYC requirements, crypto wallet verification, timelines, and consequences for non-compliance.

14. Review of Policy

Reviewed annually or sooner following regulatory updates or internal audit triggers.