

## **AML / KYC DISCLOSURE**

### **Purpose**

The purpose of this AML/KYC Policy is to establish a comprehensive and transparent framework for verifying the identity and age of all players who wish to access **Complex Technologies B.V.** gaming services. This Policy ensures that:

- All players are accurately identified and authenticated before being granted full access to any gaming products or services, thereby preventing unauthorized or fraudulent use of the platform.
- Only individuals who meet the minimum legal gambling age, as defined under the applicable laws of the player's jurisdiction, are permitted to register and participate in gaming activities.
- Verification is conducted using reliable, government-issued identification documents, complemented by any supporting information necessary to confirm the accuracy and legitimacy of the details provided by the player.

This Policy also serves to prevent underage gambling, mitigate risks of identity theft or fraud, and ensure compliance with all relevant anti-money laundering (AML) and counter-terrorist financing (CTF) obligations imposed by applicable regulatory authorities. By implementing robust identity verification procedures, **Complex Technologies B.V.** promotes a secure, responsible, and legally compliant gaming environment for all users.

### **Prevention of Criminal Abuse of Services**

Prevents the use of the gaming **Complex Technologies B.V.** as a channel for money laundering, terrorist financing, fraud, identity theft, or other unlawful financial activities. Deters the concealment of illegally obtained funds through gambling activity. Blocks attempts to fund accounts with fraudulent or unauthorized payment methods.

### **Protection of Players and the Platform**

Safeguards players by ensuring that their transactions are secure, lawful, and transparent. Protects **Complex Technologies B.V.** from reputational, financial, and regulatory risks associated with criminal misuse of gaming services. Provides a framework for fair play, accountability, and lawful participation.

### **Compliance with Legal and Regulatory Obligations**

Ensures that gaming services are not exploited for criminal purposes in breach of applicable laws. Requires **Complex Technologies B.V.** to monitor player activity, retain records of identification and transactions, and report suspicious activity to relevant authorities if legally required.

### **Commitment to Continuous Improvement**

Recognizes that AML and KYC practices evolve as new threats emerge.

### **Document Requests (KYC Procedures)**

#### **General Requirement**

To maintain the integrity of **Complex Technologies B.V.**, all players are required to undergo Know Your Customer (KYC) verification. Verification is necessary to confirm identity, ensure legal eligibility, secure financial transactions, and prevent misuse of services.

**Complex Technologies B.V.** reserves the right to request documents from any player at any stage of the relationship.

Players may be required to provide one or more of the following documents:

- Government-issued photo identification (must be valid and unexpired):
  - Passport;
  - National ID card;
  - Driver's license.
- Proof of residential address (document must clearly show the player's name and address, dated within the last three months).

### **Completion of Verification**

Verification is deemed complete only when all required and supplemental documents have been reviewed and approved. Verification is a continuing process; **Complex Technologies B.V.** may re-verify accounts periodically to ensure documents remain valid.

Where higher risks evolve, **Complex Technologies B.V.** applies additional measures. These may include but are not limited to:

- Obtaining proof of source of funds (e.g., recent pay slips, employment contracts, bank statements showing income).
- Verification of source of wealth (e.g., ownership of businesses, property sale agreements, investment portfolios).

### **Player Responsibilities**

Players must ensure that their personal and payment details are accurate and consistent with the submitted documents.

### **Data Storage and Security**

#### **Confidentiality and Secure Storage**

All documents, personal information, and verification data submitted by players are treated as strictly confidential. Data is stored using industry-standard encryption both in transit and at rest to prevent unauthorized access, loss, or tampering. Secure servers and data centers are used, with redundancy and backup systems to ensure data integrity and availability.

#### **Data Retention**

Player data is retained only for as long as necessary to fulfill:

- Regulatory and legal obligations under applicable AML, KYC, and gaming laws;
- Operational purposes, including ongoing account management, dispute resolution, and transaction verification;
- Fraud detection, compliance monitoring, and internal audit requirements.

Once data is no longer required for these purposes, it will be securely deleted or anonymized in accordance with data protection best practices.

#### **Data Sharing and Disclosure**

Player data will not be disclosed to unauthorized third parties under any circumstances.

Disclosure may occur only when:

- Required by law or governmental authority;
- Necessary for the prevention of fraud, money laundering, or other unlawful activities;
- Required to enforce the **Complex Technologies B.V.** terms and conditions.

Any third-party service providers involved in processing personal data are subject to strict contractual obligations ensuring compliance with confidentiality, data security, and AML requirements.

### **Data Breach Protocols**

In the event of an actual or suspected data breach, **Complex Technologies B.V.** has established a rapid-response protocol to:

- Identify and contain the breach;
- Assess the impact on affected individuals;
- Notify relevant authorities as required;
- Inform affected players if their personal data is compromised, in accordance with applicable law.

### **Audit and Compliance Monitoring**

All data storage and processing systems are subject to regular internal and external audits to ensure compliance with AML, KYC, and data protection standards. Continuous monitoring and security updates are applied to protect against emerging threats and maintain regulatory compliance.

### **Notifications and Temporary Suspensions**

#### **Notifications to Players**

Players will be promptly informed if additional documentation or information is required for verification purposes. Notifications may be delivered via email, in-app messages, or other secure communication channels linked to the player's account.

Communications will clearly outline:

- What specific documents or information are needed;
- Any deadlines for submission;
- Potential consequences of delayed or incomplete submissions, including temporary account restrictions.

#### **Temporary Account Suspensions**

**Complex Technologies B.V.** may temporarily suspend accounts under the following circumstances:

- Verification documents are missing, unclear, or under review;
- Suspicious or unusual transaction activity is detected;
- Potential fraudulent, money laundering, or unlawful activity is suspected;
- Regulatory or compliance investigations are ongoing.

During a suspension, **Complex Technologies B.V.** may restrict or disable deposits, wagers, withdrawals, or other account functions as necessary to mitigate risk.

#### **Duration and Resolution of Suspensions**

Temporary suspensions will remain in effect until verification is successfully completed or the matter is resolved. Players will be notified when the suspension is lifted, along with any steps taken or findings relevant to the account status.

#### **Permanent Account Closure**

**Complex Technologies B.V.** reserves the right to permanently close accounts where:

- Fraudulent activity, money laundering, or other unlawful conduct is confirmed;
- Players fail to provide required verification documents within a reasonable timeframe;
- Non-compliance with the **Complex Technologies B.V.** terms, AML/KYC policies, or applicable laws is detected.

In cases of permanent closure, **Complex Technologies B.V.** may withhold pending withdrawals or take further action in accordance with applicable laws to prevent unlawful fund transfers.

### **Record-Keeping and Audit**

All notifications, suspension actions, and account closure decisions are logged and archived securely for audit and regulatory purposes. These records are maintained to ensure transparency, compliance verification, and continuous improvement of AML/KYC procedures.

## **Player Responsibility**

### **Accuracy of Information**

Players are required to provide true, complete, and up-to-date personal information at all times. Any changes to personal details, including name, address, payment methods, or identification documents, must be promptly updated through the account or by contacting **Complex Technologies B.V.**

### **Compliance with Document Requests**

Players must submit all requested verification documents in the required format and within the specified timeframe. Failure to provide the requested documents or providing documents that are false, altered, expired, or misleading may result in:

- Temporary suspension of account access;
- Restriction or withholding of deposits, wagers, or withdrawals;
- Permanent account closure.

### **Acknowledgment**

By maintaining an account and using **Complex Technologies B.V.** services, players acknowledge and accept their obligations under this AML/KYC Disclosure, including their responsibility to provide accurate information and comply with verification procedures.