

Crypto Acceptance Policy – Hazarion NV

V1.1 - 23rd May 2025

1. Purpose

This policy establishes the framework for accepting, processing, and managing cryptocurrency transactions on [Company Name]'s gambling platform. It ensures compliance with Curaçao eGaming regulations, international AML/CFT standards, and best practices for customer protection and operational security.

2. Scope

This policy applies to all cryptocurrency-related activities, including but not limited to deposits, withdrawals, wagering, and internal handling of crypto assets on [Company Name]'s platform.

3. Definitions

- **Cryptocurrency:** A digital asset using cryptography for secure transactions, including but not limited to Bitcoin (BTC), Ethereum (ETH), and Litecoin (LTC).
 - **Wallet:** A digital storage mechanism for cryptocurrencies.
 - **Blockchain Confirmation:** The process by which a crypto transaction is validated and recorded on the blockchain.
 - **KYC (Know Your Customer):** The process of verifying the identity of customers.
 - **AML (Anti-Money Laundering):** Measures to prevent the use of the platform for money laundering or terrorist financing.
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4. Accepted Cryptocurrencies

- The platform currently accepts multiple currencies including:
 - Bitcoin (BTC)
 - Ethereum (ETH)
 - Ripple (XRP)
 - USDT
 - The list of accepted cryptocurrencies will be reviewed quarterly and updated as necessary based on market trends, security considerations, and regulatory guidance.
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5. Customer Onboarding and Verification

5.1 KYC Procedures

- All customers must complete KYC verification before being permitted to deposit, wager, or withdraw cryptocurrencies.
- Required documentation includes:
 - Government-issued photo identification (passport, national ID, or driver's license)
 - Recent proof of address (utility bill, bank statement, or government correspondence, dated within the last 90 days)
 - Selfie or live video verification as required
- KYC data is securely stored and handled in compliance with GDPR and local data protection laws.

5.2 Enhanced Due Diligence (EDD)

- EDD will be conducted for:
 - High-value transactions (exceeding €2,000 or equivalent in crypto)
 - Customers from high-risk jurisdictions
 - Politically Exposed Persons (PEPs)
 - EDD may include:
 - Verification of the source of funds and wealth
 - Additional documentation or interviews
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6. Transaction Processing

6.1 Deposit Procedures

- All deposits must be sent to unique, customer-specific wallet addresses generated by the platform.
- Deposits require a minimum of 3 blockchain confirmations before being credited.
- Deposits below the minimum threshold or sent to incorrect addresses may not be credited or may incur additional processing time.

6.2 Withdrawal Procedures

- Withdrawals are only processed to wallet addresses verified and registered by the customer.
- Withdrawals may be subject to additional verification if flagged by the risk management system.
- The company reserves the right to delay or refuse withdrawals pending investigation of suspicious activity.

6.3 Transaction Limits

- Daily, weekly, and monthly deposit and withdrawal limits are published on the platform and may be adjusted based on risk assessment.
- Customers may request higher limits, subject to additional verification.

7. Currency Conversion and Valuation

- Cryptocurrency deposits are converted to the platform's base currency (EUR/USD) at the prevailing market rate at the time of confirmation.
- Exchange rates are sourced from reputable, independent market data providers.
- Conversion fees, if any, are disclosed transparently to customers prior to transaction completion.
- Withdrawals in cryptocurrency are processed at the current exchange rate at the time of approval.

8. AML/CFT Compliance

8.1 Monitoring and Reporting

- All transactions are monitored using automated tools to detect suspicious patterns, including structuring, rapid movement of funds, or activity inconsistent with known customer profiles.
- Suspicious transactions are escalated to the AML Compliance Officer and, if required, reported to the Curaçao Gaming Control Board and relevant authorities within statutory timeframes.
- Records of all crypto transactions, customer identification, and compliance actions are maintained for a minimum of five years.

8.2 Sanctions Screening

- All customers and transactions are screened against international sanctions lists (e.g., OFAC, EU, UN).
- Transactions involving sanctioned individuals, entities, or jurisdictions are blocked and reported.

9. Security and Custody

- Customer crypto funds are held in secure wallets utilizing multi-signature technology and cold storage for the majority of assets.
 - Hot wallets are maintained with strict withdrawal limits to facilitate operational liquidity.
 - Private keys are managed with robust access controls, encryption, and regular security audits.
 - The company conducts regular penetration testing and security reviews.
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10. Risk Management

- The company maintains a risk assessment program to evaluate and mitigate risks associated with crypto acceptance, including fraud, hacking, and regulatory changes.
 - Staff receive regular training on crypto security, AML/CFT obligations, and incident response.
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11. Customer Support and Dispute Resolution

- Customers may contact support via [email/phone/live chat] for assistance with crypto transactions.
 - All complaints and disputes regarding crypto transactions are logged and investigated promptly, with resolutions provided within 14 business days.
 - The company provides educational materials on safe crypto usage and best practices.
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12. Policy Review and Updates

- This policy is reviewed annually or upon significant regulatory or operational changes.
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