

TGI Entertainment N.V. — Disaster Recovery Plan (DRP)

Version 1.0 | Last updated: [Insert Date]

1. Executive Summary

Purpose: Ensure TGI can rapidly resume regulated online casino operations after a major disruption (technical, operational, or reputational), coordinating with external vendors and partners.

Scope: All Curaçao-licensed casino brands operated by TGI Entertainment N.V., including customer-facing sites, payment processing (via Spervi Ltd), and platform services (via EveryMatrix Ltd).

Objectives:

- Maintain regulatory compliance under Curaçao eGaming license.
- Minimize downtime and financial loss.
- Ensure player funds and data remain secure.
- Coordinate recovery among vendors (EveryMatrix, B2B Hosting, Spervi).

2. Governance & Roles

Role	Responsibility
Disaster Recovery Manager (TGI)	Oversees activation, coordination, communication, and documentation.
Incident Commander	Leads the operational response, decision-making authority.
Compliance Officer (TGI)	Ensures Curaçao eGaming notification and data protection obligations are met.
Finance Lead (Spervi Ltd)	Manages payment continuity, reconciliations, and partner communication.
Technical Liaison (B2B Hosting)	Coordinates all infrastructure-related recovery and failover activities.
Platform Liaison (EveryMatrix)	Manages software/platform recovery status, game resumption, and reporting.

Legal & Communications Lead

Manages external statements, media, and regulator notifications.

3. Scope & System Dependencies

System/Function	Owner	Dependency	Description
Casino websites	TGI	B2B Hosting	Domain management, DNS, site uptime
Gaming platform	EveryMatrix	TGI	Game engine, player sessions, RNG
Payment processing	Spervi Ltd	TGI	Merchant accounts, payment gateways, reconciliation
KYC / AML systems	EveryMatrix + TGI	-	Verification systems, player due diligence
CRM / Player Support	TGI	EveryMatrix	Player communications, retention tools
Regulatory Reporting	TGI	EveryMatrix	Curaçao eGaming reporting and transaction logs

4. Risk Scenarios

1. Hosting outage (handled by B2B Hosting)
 - Impact: Temporary site downtime.
 - TGI role: Notify regulator, players if prolonged, and coordinate recovery updates.
2. Platform outage (EveryMatrix)
 - Impact: Games unavailable, possible transaction suspension.
 - TGI role: Coordinate with EveryMatrix, suspend deposits, inform players.
3. Payment gateway disruption (Spervi)
 - Impact: Inability to deposit/withdraw.
 - TGI role: Activate backup payment routes or manual payout procedures.
4. Cyberattack or data breach
 - Impact: Data exposure, potential license breach.

- TGI role: Engage EveryMatrix and B2B Hosting security teams, inform Curaçao regulator, follow GDPR steps if applicable.
5. Reputational incident / regulatory suspension
- TGI role: Activate crisis communications plan, prepare regulator response.

5. Activation & Escalation

Activation Triggers:

- Casino sites unavailable > 30 minutes.
- Payment gateway failure > 2 hours.
- Security breach or confirmed data loss.
- Directive from Curaçao regulator.

Escalation Procedure:

1. Incident detected → Notify DR Manager.
2. DR Manager assesses severity → Declares Disaster if necessary.
3. Activate Incident Commander & notify key vendors.
4. Inform Curaçao regulator (as per license condition).
5. Activate communication templates (internal & external).

6. Coordination with Vendors

B2B Hosting:

- Owns infrastructure DRP (network, servers, backups).
- TGI receives regular status updates.
- TGI ensures SLA enforcement (RTO 4h, RPO 1h recommended).
- TGI maintains current contact list for 24/7 escalation.

EveryMatrix Ltd:

- Platform redundancy and data replication handled by EveryMatrix.
- TGI ensures daily transaction reconciliation and data export for redundancy.
- Communication channel: Support portal + 24/7 account manager.

Spervi Ltd (Cyprus):

- Responsible for all payment gateways and financial continuity.
- Maintains backup PSPs and reconciliation logs.
- Can trigger manual payouts with TGI approval if automated systems down.

7. Communication Plan

Internal:

- Slack/Teams + emergency WhatsApp group for DR core team.
- Updates every 2 hours until service restoration.

External:

- Regulator: Curaçao eGaming to be notified within 24h of major incident.
- Players: Use email, site banners, and social channels for updates.
- Vendors: Regular coordination calls until recovery confirmed.

Templates to prepare:

- "Temporary Service Interruption" notice for website.
- "Payment Delay" player communication.
- Regulator notification letter (summary + recovery timeline).

8. Recovery Strategy Summary

Service	Responsible Party	RTO	RPO	Strategy
Hosting / Website	B2B Hosting	4 hrs	1 hr	Geo-redundant data centers, DNS failover
Gaming Platform	EveryMatrix	4 hrs	15 min	Cloud-based auto failover
Payments	Spervi Ltd	8 hrs	1 hr	Multi-gateway failover or manual payout
KYC / AML	EveryMatrix	24 hrs	-	Secondary verification partner
Player Support	TGI	12 hrs	2 hrs	Cloud backup of CRM system

9. Compliance & Legal Obligations

- Regulator: Notify Curaçao eGaming Authority promptly for any significant service or

security incident.

- Data Protection: Follow GDPR protocols for EU/EEA player data; notify relevant authority within 72 hours if required.
- Contracts: DR and SLA clauses to be reviewed annually with B2B Hosting, EveryMatrix, and Spervi.
- Insurance: Verify coverage for cyber, business interruption, and data loss events.

10. Post-Incident Procedures

1. Verify full restoration and stability.
2. Reconcile all transactions (with Spervi).
3. Verify player balances and resolve discrepancies.
4. Prepare post-mortem report (within 7 days).
5. Update DR documentation and runbooks.
6. Conduct lessons-learned session with vendors.

11. Testing & Review

- Annual DR test: Simulated outage across all vendors.
- Quarterly failover test: Hosted by B2B Hosting and EveryMatrix.
- Annual review: Update contact lists, vendor SLAs, and Curaçao license compliance requirements.

12. Appendices

- Contact directory (TGI core team, EveryMatrix, B2B Hosting, Spervi, Curaçao eGaming).
- Regulatory reporting templates.
- Incident and communication logs (sample).
- Summary of SLAs and RTO/RPO commitments.