

1. Introduction and Scope

This policy defines the rules, procedures, risks, and compliance measures associated with accepting, holding, and transacting in cryptocurrencies.

It applies to all cryptocurrency transactions conducted on our platform and aligns with the Curacao Gaming Commission (CGA) regulations and other applicable laws.

Accepted cryptocurrencies: Bitcoin (BTC), Ethereum (ETH) – selected for their stability, liquidity, and security.

2. Regulatory Stance

We acknowledge and fully comply with CGA's specific guidance on the use of cryptocurrencies in licensed gambling operations.

This policy is regularly reviewed against current CGA rulings and informed by legal counsel.

3. Risk Management

- Volatility: All crypto deposits are converted to fiat immediately upon receipt.
- Security: Funds are held in cold storage; hot wallets are used only as needed. Multi-signature protocols secure transactions. Private keys are stored offline.
- Cybersecurity: Regular audits, firewalls, intrusion detection, and encryption.
- AML/CFT: See Financial Crime Policies.
- Regulatory: We monitor ongoing changes in crypto regulations.

4. Player Transactions

Deposits:

- Players are provided wallet addresses for deposits.
- Minimum/maximum deposits thresholds apply.

- Crypto is converted at market rates via our merchant Partners (Cryptopay.me and GammaG)

Withdrawals:

- Subject to KYC completion.
- Withdrawals processed within 48 hours.
- Network fees borne by the player.
- Minimum/maximum withdrawal thresholds apply.

Balances:

- Player balances are held in fiat equivalent to reduce volatility exposure.

5. AML/CFT and KYC for Crypto

- Full KYC is required before allowing any crypto transactions.
- Blockchain analytics tools used: [e.g. Chainalysis, Elliptic].
- Enhanced checks for high-risk transactions or wallets.
- No support for privacy coins or use of mixing services.

6. Technology and Infrastructure

- Crypto processor: [Cryptopay.me; GammaG].
- Integrated with gaming backend for real-time balance and transaction updates.

7. Record Keeping

- Records retained: wallet addresses, transaction IDs, timestamps, amounts, KYC data.
- Retention period: Minimum 5 years.

8. Staff Training

- All relevant staff receive crypto-specific AML/CFT and operational procedure training.

9. Policy Review and Updates

- Reviewed every 6 months or sooner if regulation changes.
- Updates communicated to all staff and published on the platform.