



Know Your Customer (KYC) Policy

Know Your Customer (KYC) Policy	1
1. Introduction	1
2. Customer Identification and Verification (CIP)	1
2.1 Mandatory Identity Verification	1
2.2 Acceptable Identity Documents	2
3. Enhanced Due Diligence (EDD)	2
4. Ongoing Monitoring	3
5. Record Keeping	3
6. Data Protection and Confidentiality	3
7. Staff Training and Responsibility	3
8. Regulatory Cooperation	4

1. Introduction

This Know Your Customer (KYC) Policy outlines the procedures and standards followed by **Spinzz** to verify the identity of our customers in compliance with the regulatory framework. The primary objectives of this policy are to:

- Prevent identity theft, financial fraud, money laundering, and terrorist financing.
 - Ensure that only eligible players access our gaming services.
 - Maintain a safe and transparent gambling environment.
-

2. Customer Identification and Verification (CIP)

Spinzz implements a risk-based Customer Identification Program (CIP) for all players who register and interact with the platform. This includes:

2.1 Mandatory Identity Verification

All customers must provide valid identification documents before being allowed to:

- Deposit or withdraw funds.
- Access bonuses or promotions.

- Play beyond a defined threshold.

Verification includes:

- Full Name
- Date of Birth (must be 18+)
- Residential Address
- Email Address and Mobile Number
- Nationality and Country of Residence

2.2 Acceptable Identity Documents

Players must submit:

- Government-issued Photo ID: Passport, National ID card, or Driver's License (must show full name, photo, and date of birth).
- Proof of Address: Utility bill, bank statement, or official government correspondence dated within the last 3 months.
- Proof of Payment Method Ownership: Screenshot or document showing ownership of the bank account, credit/debit card, or e-wallet used.

3. Enhanced Due Diligence (EDD)

Spinzz conducts Enhanced Due Diligence (EDD) for customers who:

- Exceed transaction or deposit thresholds.
- Exhibit unusual or high-risk behavior.
- Are classified as Politically Exposed Persons (PEPs).
- Operate in or are residents of high-risk jurisdictions.

EDD may include:

- Requesting additional documents (e.g., source of funds/wealth).
- Conducting open-source checks and sanctions screening.
- Requiring notarized documents or video verification.

4. Ongoing Monitoring

Spinzz monitors player activity continuously to:

- Detect suspicious behavior, rapid deposit/withdrawal cycles, or multiple account creation.
 - Identify inconsistencies between personal data and account activity.
 - Trigger re-verification in case of red flags or account changes (e.g., payment method or IP location).
-

5. Record Keeping

In accordance with Curaçao requirements:

- All KYC documentation and verification records are securely retained for a minimum of **5 years** after the termination of the player relationship.
 - Records are encrypted and stored in compliance with data protection and privacy laws.
 - Access is restricted to authorized personnel only.
-

6. Data Protection and Confidentiality

Spinzz adheres to strict data privacy standards. Player information collected for KYC purposes:

- Is used solely for identity verification and regulatory compliance.
 - Will not be shared with third parties except as required by law or regulatory authorities.
 - Is protected using industry-standard security protocols and encrypted storage.
-

7. Staff Training and Responsibility

- All relevant staff are trained in KYC, AML, and fraud detection procedures.
- Training is refreshed regularly to reflect emerging risks, typologies, and regulatory changes.
- A designated Compliance Officer oversees KYC operations and reporting obligations.

8. Regulatory Cooperation

Spinzz is committed to full cooperation with the Curaçao Gaming Commission and any relevant financial intelligence units. We will provide requested documentation, respond to inquiries, and file reports where legally required (e.g., Suspicious Activity Reports).