

CONFIDENTIAL

INFORMATION SECURITY POLICY

Rapture B.V., a Company with registered address at
Kaya Richard J. Beaujon Z/N Landhuis Joonchi II Curacao,
registration number 156074, domain name: pldm.best
(hereinafter referred to as “**Company**”)

**Gouloud Mercedes
Hammoud** obo Guardian
Corporation Curacao B.V.,
the Statutory Director

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KEY INFORMATION

Approving Official(s):	Gouloud Mercedes Hammoud obo Guardian Corporation Curacao B.V., the Statutory Director
Responsible Office:	Gouloud Mercedes Hammoud obo Guardian Corporation Curacao B.V., the Statutory Director
Effective Date:	17.06.2025
Next Review Date:	17.06.2026

1. GENERAL PROVISIONS AND POLICY STATEMENT

- 1.1. Rapture B.V. places a high priority on protecting the privacy of its Players and is transparent about the reasons for collecting personal data and how it is utilized.
- 1.2. This Information Security Policy (the 'Policy') outlines how personal data is used, as well as the rights and options available to Players concerning their information.
- 1.3. If a Player disagrees with any provision of this Policy, they must discontinue using our services. By registering an account, placing bets, or transferring funds, the Player agrees to the Terms of Service and this Policy.
- 1.4. Players may choose to stop using the website at any time, though some data may need to be retained to meet legal obligations.
- 1.5. This Policy may be updated periodically. Updates will be published on the website, and Players are encouraged to check for changes regularly.

2. DEFINITIONS AND ABBREVIATIONS

- 2.1. **Company** – refers to Rapture B.V., a legally registered entity under the laws of Curaçao (registration no. 156074), located at Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Curaçao.
- 2.2. **GCB** – Gaming Control Board of Curacao.
- 2.3. **GDPR** – General Data Protection Regulation.
- 2.4. **CGA** – Curacao Gaming Authority.
- 2.5. **XCG** – Caribbean Guilder, the currency of Curaçao.
- 2.6. **Gambling or Gambling Game** — refers to any online game made available on the Website in which a Player competes for a Prize. This includes: (i) games that incorporate both elements of chance and skill; (ii) games where chance can be overcome through exceptional skill; and (iii) games that are presented as involving an element of chance, regardless of whether they actually do—excluding sports.
- 2.7. **Customer** —refers to any individual who accesses or navigates the Website, reviews its terms, this Policy, and related documents, and expresses the intention to register on the Website in order to engage in Gambling and obtain Player status.
- 2.8. **Third Parties** — any individuals and/or legal entities other than the User and/or the Player, in particular, but not exclusively: family members, spouses, friends, partners, counterparties, creditors, service providers, agents, etc.
- 2.9. **Website** — the official websites of the Company, on which Customer may play the Gambling Games.
- 2.10. In this Policy singular include the plural, and the plural include singular in cases of a need for interpretation.

3. PRINCIPLES OF PERSONAL DATA COLLECTING

3.1. The Company adheres to General Data Protection Regulation (Regulation (EU) 2016/679) principles for handling personal data:

- Lawfulness, Fairness, and Transparency – Data is processed legally and fairly, with openness about its use.
- Purpose Limitation – Data is collected for specific, legitimate purposes and not used beyond those intentions.
- Accuracy – Efforts are made to ensure data is correct and up to date, with prompt correction or removal of inaccuracies.
- Storage Limitation – Data is retained only as long as necessary for the stated purposes.
- Integrity and Confidentiality – Security measures are applied to protect data from unauthorized access, loss, or damage.

4. PERSONALLY IDENTIFIABLE INFORMATION

4.1. To access the full range of services on the Website, Players must provide personal information. This information grants access to key features and related services.

4.2. The Company may collect personal data in the following scenarios:

- When a Player registers on the Website;
- During use of the Website and services;
- When information is voluntarily disclosed in public areas;
- When the Player contacts the Support Team.

4.3. Collected personal information may include but is not limited to:

- Username;
- First and surname;
- Date of birth;
- Email address;
- Address of residence;
- Phone number;
- Billing address;
- Documents the proof of the Player's identity;
- Proof of address documents;
- Transaction history;
- Website usage preferences;
- Any other information the Player provides the Company with when using the website;
- Credit/debit card details, or other payment information;

4.4. All data provided by the Player must be correct and valid. It is the sole responsibility of the Player to ensure the accuracy, completeness and correctness of the data provided to the Company.

4.5. Personal data is also collected to verify the Player's legal age for gambling, and for billing-related purposes.

4.6. Players may request updates or corrections to their personal data through the Support Team.

4.7. All collected data is for internal use only and may be shared with third parties only under conditions specified in this Policy.

5. HOW AND WHY THE COMPANY USES PERSONAL INFORMATION OF PLAYERS

5.1. The Company uses Players' personal data for the following purposes:

- To deliver services and fulfill contractual obligations;
- To comply with applicable legal and regulatory requirements;
- To monitor and enhance website performance;
- To send promotional and marketing communications when consent has been given.

6. TRAFFIC ANALYSIS AND NON-PERSONALLY IDENTIFIABLE INFORMATION

6.1. To improve website usability and accessibility, the Company collects non-identifiable data about usage patterns.

6.2. This includes information such as IP address, access times and dates, visited pages, browser types, and crash reports.

6.3. This data is used solely to enhance service quality and is not linked to a Player's identity.

7. SHARING THE PLAYER'S PERSONAL INFORMATION

7.1. The Company may disclose personal data in the following situations:

- Legal or regulatory compliance requirements;
- Enforcement of terms and conditions or other legal agreements;
- Involving third-party service providers supporting Company operations;
- Detecting and preventing fraud or manipulation;
- Conducting responsible gambling research;
- Protecting rights, assets, and safety of the Company and Players;
- When authorized by law.

7.2. The Player confirms that the personal data may be transferred to any country in which the Company or the affiliates, agents may maintain facilities.

8. PERSONAL DATA STORAGE TERMS

8.1. Personal data is retained for the full duration of the Player's engagement with the Company.

8.2. After account closure, data is stored for five years to facilitate dispute resolution or fulfill legal obligations.

8.3. Once no longer required, data will be securely deleted or destroyed.

9. SECURITY

9.1. The Company is dedicated to protecting Player information through advanced encryption and access controls.

9.2. All personal data is stored in secure databases protected by SSL/TLS 1.2 encryption and password authentication.

9.3. Affiliates and partners are expected to follow equivalent security protocols.

10. MARKETING

- 10.1. Marketing messages are sent only if the Player has opted in.
- 10.2. The Company does not share data with third parties for their own marketing purposes.
- 10.3. Players may modify or revoke their marketing preferences at any time.

11. COOKIES

- 11.1. The Company uses cookies to personalize the experience and ensure website functionality.
- 11.2. Cookies are small text files stored on a device, enabling recognition and functionality during visits.
- 11.3. Cookies may be first-party or third-party, the latter used for analytics and ad performance.
- 11.4. Types of cookies used:
 - Functional: Analyze usage and player selections;
 - Required: Enable essential navigation and functionality;
 - Advertising: Evaluate marketing effectiveness.

12. DISCLAIMER

- 12.1. The services are provided on an 'as-is' and 'as-available' basis.
- 12.2. The Company disclaims liability for events outside its control and does not guarantee error-free data processing.
- 12.3. It is not liable for indirect or incidental damages related to data use or disclosure under this Policy.

13. CONTACT INFORMATION

- 13.1. For any questions regarding this policy, please contact: support@pldm.best or send a mail on the address: Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Willemstad, P.O. Box 6248, Curacao.

14. POLICY HISTORY

June 17, 2025	Policy update (Annual update)
December 01, 2024	Policy update (legal changes)
June 12, 2024	Policy update (legal changes)
May 28, 2024	Policy update (Annual update)
December 12, 2023	Policy update (legal changes)
May 20, 2023	Policy update (Annual update)
May 24, 2022	Initial Policy