

Niollo B.V. – Customer Funds Segregation Policy

Purpose

This policy outlines the principles and controls Niollo B.V. applies to ensure the segregation of customer funds in compliance with the general licence conditions set by the Curacao Gaming Authority (CGA).

Policy Statement

Niollo B.V. is committed to maintaining a clear and robust separation between customer funds and operational or corporate funds. This ensures that customer deposits are protected and available for withdrawal at all times, regardless of the company's financial position.

Key Principles

Dedicated Bank Accounts

All customer funds are held in designated bank accounts that are separate from Niollo B.V.'s operational accounts. These accounts are used exclusively for the receipt, storage, and withdrawal of customer deposits and winnings.

No Commingling of Funds

Under no circumstances are customer funds used to finance operational expenses, investments, or any other non-customer-related activities. Internal controls prevent any transfer of funds from customer accounts to corporate accounts without explicit authorization and reconciliation.

Weekly Reconciliation

Customer account balances are reconciled weekly against the balances held in the segregated bank accounts. Any discrepancies are investigated and resolved promptly, with escalation procedures in place for material variances.

Access Controls and Oversight

Access to customer fund accounts is restricted to authorised personnel only.

Contingency and Safeguards

In the event of insolvency or operational disruption, customer funds remain protected and are not subject to claims by creditors. Niollo B.V. maintains a Player Protection Account as an additional safeguard, even though not explicitly required under Curacao law.

Transparency and Reporting

The segregation policy is documented and available for inspection by the CGA and other relevant authorities.