

Responsible gaming policy

(last update 05.11.2025)

1. Introduction

Promotech N.V., registration number 165167, address: Dr. H. Fergusonweg 1, Curaçao (hereinafter – the “Company” or “we”), is committed to ensuring a secure, fair, and responsible gaming environment for all players using our online platform, available at <http://fortunica.casino/> (hereinafter – the “Website”).

We acknowledge our responsibility to encourage responsible gaming and to protect our customers from potential harm related to gambling activities.

1.1. Responsible gaming commitment

The Company recognizes that gambling should remain an enjoyable and controlled form of entertainment. Our Responsible Gaming framework is structured to prevent the development of problematic gambling behavior and to equip players with resources and tools that enable them to make well-informed choices regarding their gaming activities.

1.2. Age verification and protection of minors

The Company enforces a strict policy against underage participation in gambling. We utilize advanced age verification procedures to ensure that only individuals who have reached the legal gambling age of eighteen (18+) years or older are permitted to use our services. Any account identified as belonging to a person below the legal age will be subject to immediate suspension.

1.3. Self-exclusion and account limits

To support responsible gaming, we provide players with the option to set deposit limits. Additionally, players who feel they need a break from gambling can opt for temporary or permanent self-exclusion, cooling off period. These measures help ensure that gaming remains a recreational activity and not a compulsive behavior.

1.4. Monitoring and support for problem gambling

The Company is dedicated to detecting indicators of problem gambling through continuous monitoring of player activity and behavioral analytics. Our customer support team is trained to identify patterns consistent with gambling-related harm and to provide appropriate assistance. Where necessary, players will be guided towards professional support services and organizations specializing in the prevention and treatment of gambling addiction.

1.5. Fairness and transparency in gaming

The Company guarantees that all gaming activities are conducted in a fair and transparent manner by employing certified Random Number Generators (RNGs) and regularly audited gaming systems. Our Terms and Conditions are presented in a clear and accessible format to ensure players have full visibility into our operational procedures and rules.

1.6. Data protection and privacy

Protecting customer data is a top priority. We comply with all applicable data protection laws and implement secure measures to safeguard personal and financial information.

1.7. Encouraging responsible play

Our customer support team is available 24/7 to assist with any responsible gaming concerns.

1.8. Legal and regulatory compliance

As a Curaçao-licensed operator, we adhere to all regulations set forth by the Curaçao Gaming Authority (CGA). We continuously monitor and update our policies, including responsible gaming policy, to ensure compliance with industry best practices.

2. Age verification

2.1. To safeguard against underage gambling, the Company implements stringent age verification measures:

- Players must be at least eighteen (18) years of age to register or participate in gaming activities. Age is verified through the submission and confirmation of the player's date of birth. For this purpose, the Company requires a valid government-issued identification document, such as a passport, national identity card, or driver's license. Additional documentation may be requested, including but not limited to a recent photograph (selfie), proof of residential address, or verification through reputable third-party databases.
- If the verification process confirms that a player is underage, or if the Company has reasonable grounds to suspect this, the player's account will be closed. With the exception of any funds frozen in accordance with the Company's Anti-Money Laundering (AML) Policy, deposits made by the minor will be returned, and any winnings will be voided.
- The Company maintains detailed records of all age verification checks and their results, as required for regulatory compliance.
- To further mitigate the risk of underage gambling, the Company advises adults to take precautionary measures when sharing devices with minors, such as securing usernames, passwords, and payment information. Players may also consider the use of third-party software solutions designed to block access to gambling websites.
 - a. Net Nanny – www.netnanny.com
 - b. GamBlock – www.gamblock.com
 - c. CyberSitter – www.cybersitter.com

3. Self-Assessment

3.1. The Company encourages players to regularly evaluate their gambling behavior to ensure that their activities remain within healthy and controlled limits.

For this purpose, we provide access to self-assessment tools consisting of structured questionnaires designed to help identify potential indicators of problem gambling. These tools enable players to make informed decisions regarding their gaming activity.

3.2. One widely recognized resource is the *20-Question Test* developed by Gamblers Anonymous, available at: <https://gamblersanonymous.org/20-questions/>.

If a player identifies signs of problematic gambling through the use of these tools, the Company strongly encourages the use of its Responsible Gaming measures, which may include a cooling-off period, temporary account suspension, or self-exclusion.

4. Behavioral monitoring

4.1. The Company actively observes player activity to identify potential indicators of problematic gambling, using a combination of automated monitoring systems and manual review processes. This monitoring may include, but is not limited to, the following:

- **Deposit and wagering patterns** – identifying sudden increases in deposit amounts or irregular betting behavior.
- **Session duration** – flagging extended, uninterrupted gaming sessions without adequate breaks.
- **Withdrawal reversals** – detecting repeated cancellations of withdrawal requests, which may signal harmful gambling behavior.
- **Multiple payment methods** – monitoring changes in funding sources, particularly when used to circumvent established limits.
- **Frequent changes to limits** – observing repeated adjustments to deposit or wagering limits.
- **Repeated use of Responsible Gaming tools** – tracking excessive reliance on cooling-off periods, self-exclusions, or similar measures.
- **Customer communication patterns** – noting frequent contact with support regarding financial difficulties, bonus requests, or gaming-related distress.
- **High expenditure by younger players** – applying enhanced monitoring to players under the age of twenty-five (25) who engage in significant wagering activity.

4.2. This list is not exhaustive, and the Company reserves the right to monitor additional behavioral indicators to meet its regulatory obligations.

4.3. When the assessment of a player's profile reveals potential signs of problem gambling, the Company's support team may take one or more of the following actions:

- Sending targeted Responsible Gaming communications, including recommendations and information on available tools such as deposit limits, time-outs, and self-exclusion.
- Encouraging the player to implement deposit or session limits.
- Restricting account functionality or imposing limits where necessary.

- Referring the player to recognized external support services specializing in gambling-related issues.

5. Responsible gaming training

5.1. To uphold the highest standards of Responsible Gaming, the Company ensures that all individuals involved in the operation and promotion of its services receive appropriate training.

5.2. Employee training

- All personnel with direct customer interaction, including but not limited to customer support representatives, VIP account managers, and Responsible Gaming officers, must complete formal Responsible Gaming training.
- Training covers the identification of signs of gambling-related harm, the correct handling of self-exclusion or cooling-off requests, and sensitive engagement with players who may be at risk.
- Employees are required to participate in refresher training on an annual basis to remain informed about updated policies, procedures, and industry best practices.

5.3. Affiliate and marketing partner training

- All affiliate partners must complete Responsible Gaming training prior to initiating any promotional activities for the Company's services.
- Affiliates are obliged to comply with strict guidelines, including accurate and transparent Responsible Gaming messaging, the prohibition of misleading or exaggerated claims, and the prevention of marketing to minors or vulnerable persons.

6. Cooling-off

6.1. A *Cooling-Off Period* is a temporary measure that restricts a player from participating in gambling activities for a defined period of time. The Company offers players the option to activate a cooling-off period of twenty-four (24) hours, seven (7) days, one (1) month, or three (3) months. During the selected timeframe, the player's access to gambling services on the Domain will be temporarily suspended.

6.2. The primary distinction between a Cooling-Off Period and *Self-Exclusion* lies in the duration and scope of restrictions imposed, with Cooling-Off intended as a short-term preventive measure and Self-Exclusion applied for longer-term or indefinite restrictions:

- Cooling-off period

- Short-term break (e.g., 24 hours, 7 days, 1 month, or 3 months).
- The player temporarily restricts access to gambling but can resume automatically once the period ends.
- Intended for players who want a brief pause to control their gambling behavior.

- Does not affect the player's account permanently - no need for manual reactivation.
- Self-exclusion
- Long-term or permanent restriction (e.g., 1 year, 3 years, 5 years, 10 years, or lifetime).
- The player is completely blocked from gambling for the chosen period.
- o Account remains locked, and reactivation requires formal written consent after the
- exclusion period ends.
- o Used by players facing serious gambling problems or addiction.

7. Self-Exclusion

- 7.1. Players have the right to initiate self-exclusion from gambling activities at any time.
- 7.2. The Company provides options for long-term self-exclusion periods of one (1) year, three (3) years, five (5) years, ten (10) years, or permanent exclusion. In cases where the player does not specify a preferred duration in their self-exclusion request, the default exclusion period will be one (1) year.
- 7.3. Upon receipt of a self-exclusion request via email, the player's account will be immediately deactivated. This decision is final and cannot be reversed by the player until the self-exclusion period has elapsed.
- 7.4. As a consequence of self-exclusion:
- All gambling-related transactions on the player's account will be blocked immediately.
 - The account will be deactivated to prevent any further gambling activity and the player will be excluded from all services on the Domain.
 - The player's personal data will be permanently removed from all marketing and promotional mailing lists for the duration of the self-exclusion period.
- 7.5. After the self-exclusion period ends, the you are required to confirm in writing that you want to active your account. In order to do so, please contact us through "Contact us" form on the Web-site.
- 7.6. Operator-initiated exclusion
- We reserve a right to exclude you as a high-risk intervention measure if:
- You display problematic gambling behavior.
 - You attempt or engage in criminal activities through our platform.

8. Deposit Limits

- 8.1. Players have the option to set limits on the total amount they may deposit over a specified time frame, such as weekly or monthly periods. Once the selected deposit limit is reached, no further deposits can be made until the designated time period resets.

8.2. Requests to reduce deposit limits take effect immediately, whereas requests to increase deposit limits are subject to a mandatory seven (7) day cooling-off period before becoming effective.

8.3. To set or lower a deposit limit, please contact our Support Team by contacting us through “Contact us” form on the Web-site.

9. Responsible Marketing and Advertising

9.1. To uphold responsible gaming standards, all marketing and advertising efforts by the Company adhere to the following principles:

1. Honesty and Clarity:

a. Marketing communications will not misrepresent the nature of gambling or exaggerate the chances of winning.

b. All promotions, bonuses, and wagering conditions will be presented clearly, with full disclosure of applicable terms and conditions.

2. Exclusion of High-Risk Groups:

a. Advertising will explicitly avoid targeting individuals who are self-excluded, currently under cooling-off periods, identified as having gambling problems, or under the legal gambling age.

3. Encouraging Responsible Gambling:

a. Every advertisement will feature responsible gaming messages and provide links to recognized support organizations.

b. Promotional materials will not portray gambling as a reliable source of income or a way to resolve personal or financial difficulties.

4. Bonus and Incentive Controls:

a. Bonuses will be designed to discourage excessive or impulsive gambling behavior.

b. The Company will not offer bonuses specifically aimed at players who show signs of risky gambling.

5. Affiliate and Influencer Obligations:

a. All affiliates and social media influencers promoting the Company’s services must adhere strictly to Responsible Gaming policies.

b. Failure to comply by affiliates or influencers will lead to immediate termination of their contracts.