

BETSEN Responsible Gaming Policy (CGA-Compliant Version)

Version 1.1 — Updated for Full CGA Compliance

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1. Introduction

BETSEN is committed to upholding the highest standards of responsible gaming as mandated by the Curaçao Gaming Authority (CGA). This policy outlines the company's operational, procedural, and strategic approach to ensuring that our gaming services are safe, fair, transparent, and designed to minimize gambling-related harm.

This Responsible Gaming Policy forms an integral part of BETSEN's Terms & Conditions and is accessible through the homepage and footer. It applies to all brands and domains operating under BETSEN's Curaçao license.

BETSEN strictly prohibits the offering of credit for gambling activities in all forms.

2. Core Principles

BETSEN's Responsible Gaming framework is built upon the following three pillars:

2.1 Player Protection

- Preventing minors and vulnerable persons from accessing gambling services
- Robust age and identity verification
- Monitoring at-risk behaviour and providing interventions

2.2 Fairness and Transparency

- Independent RNG and game audits
- Accurate, non-misleading marketing
- Clear information on rules, odds, and tools available to players

2.3 Prevention of Problem Gambling

- Behavioural monitoring systems

- Self-assessment tools
- Player-controlled limits
- Cooling-off and self-exclusion mechanisms

BETSEN appoints a **Responsible Gaming Officer (RGO)** responsible for policy enforcement, monitoring outcomes, and submitting an effectiveness report to the executive team annually.

3. Prevention of Underage Gambling

3.1 Minimum Age

Participation in any BETSEN gaming service is strictly limited to individuals aged **18 years or older**.

3.2 Age Verification (CGA Section 5)

BETSEN applies a two-level age and identity verification process:

1. **Self-attested date of birth** during registration
2. **Government-issued ID check** prior to first withdrawal, and earlier if risk triggers occur

Accepted ID: passport, driver's license, national ID

Secondary verification (payment validation, selfie checks, database matches) may be used but **never replace government-issued documents**.

3.3 Minor Account Handling

If a player is identified as a minor:

- The account is immediately closed
- Deposits refunded
- Winnings forfeited
- Reason for closure communicated clearly

3.4 Parental Control Tools

BETSEN recommends the use of device-level and network-level filtering tools:

- BetBlocker
 - GamBlock
 - Gamban
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4. Player Information & Accessibility

BETSEN ensures complete transparency by providing easily accessible responsible gaming information.

4.1 Responsible Gaming Section (RG Section)

The RG Section is:

- Clearly visible and accessible from homepage & footer
- Available in English and all target market languages
- Contains: deposit limits, loss limits, time limits, cooling-off, self-exclusion tools, self-assessment tests, support contacts
- Includes direct email/chat access to Responsible Gaming support

4.2 Terms & Conditions Inclusion

The RG Section is explicitly referenced in the Terms & Conditions. T&C is always **one click** away from the homepage.

4.3 Footer Requirements (Mandatory by CGA)

The homepage footer displays:

- Prohibition of underage gambling (18+)
- License holder name & registered address
- Curaçao license number
- Statement of CGA regulatory oversight
- CGA Digital Seal
- Dedicated RG link
- At least one international and one local (when available) problem-gambling

support resource

(Examples: GamCare, GambleAware, Gamblers Anonymous)

5. Self-Assessment Tools

BETSEN provides players with self-evaluation tools to identify early signs of problem gambling.

5.1 Player Account History

Players may access a minimum **six-month history** of wagers and financial transactions directly via their account.

Longer periods are provided within 10 business days upon request.

5.2 Screening Tools

Players have access to:

- **Gamblers Anonymous 20 Questions**
- **CAGE Questionnaire (Gambling Adaptation)**

5.3 Interpretation Guidance

- **0 Yes** → Low risk
- **1 Yes** → Moderate risk
- **2+ Yes** → High risk (intervention recommended)

Players identified at risk are encouraged to utilize BETSEN's safer gambling tools or seek professional support.

6. Behavioural Monitoring & Interventions

BETSEN actively monitors player behaviour to detect harmful gambling patterns.

6.1 Key Monitoring Indicators

- Sudden spikes in deposits or wagering
- Repeated reversed withdrawals
- Excessive session duration

- Multiple failed payment attempts
- Bonus-seeking and agitation during support chats
- Rapid changes to RG tools
- Multiple accounts attempt (flagged immediately)

6.2 Player Profiling & Documentation (CGA Requirement)

BETSEN maintains a **Player Account Management (PAM) profile** containing:

- Behavioural indicators
- Risk level
- Responsible gaming history
- Interventions taken

All interactions are logged.

6.3 Intervention Protocol

Depending on risk level:

- Communication recommending RG tools
- Mandatory deposit/loss limits
- Temporary account suspension
- Permanent operator-initiated exclusion in severe cases

No Responsible Gaming measure may ever be used to delay or prevent a legitimate withdrawal.

7. Player-Controlled Restrictions

7.1 Cooling-Off Period (Short-Term Breaks)

Available Durations

- 24 hours
- 7 days

- 1 month
- 3 months

Mandatory Options

1. **Duration**
2. **Marketing Opt-Out**

Optional but Supported (CGA-compliant)

- **Brand Selection:** Current brand only OR all BETSEN brands
- **Vertical Selection:**
 - All gambling activity
 - Specific verticals (Casino / Slots Only / Sports Betting / Poker etc.)

Effects

- All wagering disabled
- Withdrawals remain available
- Account stays accessible (non-gaming features only)
- Changes can only make restriction **more severe**

Reactivation

Automatic after expiry; no player action required.

7.2 Self-Exclusion (Long-Term)

Available Durations

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

Rules (CGA-Compliant)

- Immediate effect upon activation
- Player cannot log in
- All brands/domains under BETSSEN included
- Automatic marketing opt-out
- No wagers allowed
- Ante-post bets refunded according to civil law
- Poker tournaments in-progress may be completed

Duplicate Account Prevention

BETSSEN uses:

- Device fingerprinting
 - Payment method blacklisting
 - ID/document match detection
- to prevent excluded players from opening new accounts.

Reactivation Process

After the exclusion period ends:

- Player must request account reinstatement **in writing (email or chat)**
- Operator must not initiate contact
- A cooling-off review may be conducted before reactivation

8. Deposit, Loss, and Other Limits

8.1 Deposit Limits

Players may set daily, weekly, or monthly limits.

- **Limit increases** take effect immediately
- **Limit decreases** require **24 hours** cooling period

- Active wagers remain valid

8.2 Loss Limits / Time Limits / Wager Limits (Optional Tools)

Available to all players for improved bankroll management.

8.3 Exceptions Handling

If a limit is applied while:

- A poker tournament is active: the session continues until completion
- An ante-post bet is unresolved: wager remains, but no new wagers allowed

9. Staff Training & Accountability

All customer-facing and decision-making staff—including Customer Support, VIP, Marketing, Fraud, and Payments—receive **mandatory annual RG training** covering:

- Recognizing distress or vulnerability
- Conducting sensitive risk conversations
- Recording interactions in PAM
- Escalation pathways
- High-risk case handling

The Responsible Gaming Officer ensures documentation and annual reporting to management.

10. Marketing Compliance

BETSEN adheres to strict responsible marketing standards.

10.1 Prohibited Practices

- Targeting minors or vulnerable persons
- Suggesting gambling is a financial solution
- Misrepresenting odds or influence of skill
- Encouraging excessive play

- Using explicit, sexualized, or adult-themed content
- Associating gambling with alcohol, drugs, seduction, or prestige

10.2 Mandatory Inclusions

All advertisements, digital or offline, must include:

“Play Responsibly. 18+ Only.”

plus a link to the Responsible Gaming Section.

10.3 Third-Party Controls

Affiliates, influencers, brand ambassadors, and marketing agencies must comply with BETSSEN’s RG policy. Contracts include mandatory RG clauses.

11. Enhanced Responsible Gambling Measures

Based on risk profile and business model, BETSSEN may implement enhanced tools such as:

11.1 Reality Checks

- Session timers
- Real-time clocks
- Periodic pop-up reminders requiring confirmation
- Player-set custom alerts

11.2 Direct Player Interaction

Automatic or manual pop-ups may be triggered when harmful patterns emerge.

11.3 Additional Safeguards

- Extended cooling-off options
- Temporary withdrawal blocks (player-controlled)
- Recommended professional support channels

Policy History

Version	Date	Description	Author
1.0	2025-05-22	Initial draft (non-compliant)	Compliance Dept
1.1	2025-05-28	Fully revised to align with CGA Policy v1.0 (17 Apr 2025)	Compliance Dept



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