

OPERATIONS MANUAL

Carrer N.V.

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1. Introduction

Carrer N.V. (the "Company"), a company incorporated under the laws of Curaçao and registered under company number 150421, holds Curaçao B2C Online Gaming Licence No. OGL/2024/570/0396, authorizing it to provide remote gaming services in accordance with the applicable regulatory framework.

The Company offers its online gaming services through websites and domain names operating under its Curaçao B2C Online Gaming Licence and in compliance with the applicable licensing conditions.

This Operational Manual has been developed to describe the Company's operational structure, governance arrangements, internal control environment, and compliance measures applicable to its licensed gaming activities. The Manual has been prepared in accordance with the requirements of the National Ordinance on Games of Chance (LOK) and serves as a reference document for the Company's operational and regulatory compliance framework.

2. Games and software description

2.1. Gaming Portfolio

The Company provides a range of remote games of chance through gaming software supplied by licensed and authorized third-party providers. The portfolio is designed to offer a broad selection of gaming products and may be expanded, modified, or updated from time to time in accordance with commercial arrangements, technical developments, regulatory requirements, and the availability of content from integrated suppliers. The gaming portfolio may include, among others, the following categories:

Slot Games: Reel-based online casino games in which results are generated through certified Random Number Generator (RNG) technology or other approved randomization mechanisms implemented by the relevant game provider.

Table Games: Electronic versions of traditional casino games, including blackjack, roulette, baccarat, poker variations, dice games, and similar products. Outcomes are determined by certified RNG systems or other approved game-specific technologies designed to ensure fairness and randomness.

Live Casino Games: Interactive casino products streamed in real time from licensed gaming studios and conducted by live dealers. The outcome of each game is determined through physical gaming equipment and live gaming procedures supported by monitoring and verification technologies.

Sports Betting and Virtual Sports: Betting services covering both real sporting events and computer-generated virtual competitions. Bets are settled based on official event results, validated data feeds, or other approved settlement mechanisms provided by authorized suppliers.

Jackpot Games: Games linked to fixed or progressive jackpot systems, where qualifying wagers may contribute to a shared prize pool. Jackpot accumulation, triggering conditions, and prize distribution are administered automatically by the respective gaming provider or platform.

Instant Win and Original Games: A selection of proprietary and third-party products, including crash games, wheel games, plinko, dice games, and other innovative gaming formats. Depending on the game, outcomes may be generated through certified RNG technology, provably fair systems, cryptographic methods, or other approved outcome determination solutions.

Cryptocurrency-Compatible Games: Games that allow participation and settlement using supported digital assets where such functionality is available. These games are subject to the same operational, fairness, integrity, and outcome verification standards as all other products offered on the Platform.

2.2. Payment possibilities, bets, and payout mechanics

The Company supports a variety of payment methods to facilitate deposits and withdrawals through licensed payment service providers, banking institutions, electronic payment systems, and, where permitted by applicable law, cryptocurrency payment processors.

Players may fund their gaming accounts using the payment options available on the Platform. A deposit is credited only after the relevant payment provider or financial institution has successfully authorized, processed, and confirmed the transaction.

The Platform accepts transactions in multiple fiat currencies and, where available, approved cryptocurrencies. The payment methods and currencies offered to a player may differ depending on factors such as the player's jurisdiction, applicable legal and regulatory requirements, internal risk assessments, and operational considerations.

To promote responsible gaming and effective risk management, the Company applies minimum and maximum thresholds for deposits, wagers, and withdrawals. These limits may vary according to the selected payment method, the player's account status, the requirements of integrated gaming providers, compliance considerations, and other operational factors. Where applicable, the relevant limits are made available to players through the Platform.

Every wager placed on the Platform is automatically recorded within the Company's gaming system. Following the completion of a game, betting event, or other gambling activity, the corresponding gaming or betting system determines the outcome and transmits the result to the Platform for settlement.

Winning amounts are calculated automatically in accordance with the applicable game rules, payout tables, betting odds, jackpot conditions, and settlement procedures. Once settled, winnings are credited to the player's account balance and may subsequently be used for further gameplay or withdrawn, subject to the Company's verification, compliance, fraud prevention, and risk management procedures.

Withdrawal requests are processed in accordance with the Company's internal procedures, including applicable AML and KYC requirements, fraud prevention controls, and other regulatory obligations. Where considered necessary, the Company may request additional documentation or verification before authorizing a withdrawal.

The Company maintains complete electronic records of all financial activities carried out through the Platform, including deposits, wagers, winnings, bonuses, refunds, account adjustments, and withdrawals. These records are retained to support operational integrity, audit requirements, dispute resolution, and compliance with applicable legal and regulatory obligations.

2.3. Software and outcome-determining elements

The Company's online gaming platform operates through integrations with licensed third-party gaming providers. Each provider is responsible for the operation of its gaming software and for the mechanisms used to determine the outcome of the games made available on the Platform. The Company does not alter, control, or otherwise intervene in the generation of game results or the calculation of payouts.

Depending on the type of game offered, the outcome may be generated by different technologies and systems, including certified Random Number Generators (RNGs), live dealer environments, progressive jackpot mechanisms, official sports data feeds, or other approved solutions developed and maintained by the respective gaming providers.

Prior to integration, gaming suppliers are expected to hold the necessary licences, certifications, and regulatory approvals required to provide their products. Where applicable, their gaming software is independently tested and certified by recognised testing laboratories to verify compliance with applicable technical and fairness standards.

Communication between the Platform and integrated gaming providers takes place through secure technical interfaces that support the

transmission of wagering instructions, game requests, game results, settlement data, and other operational information required for the provision of gaming services. Records of these activities are automatically generated and retained within the Company's systems for operational, compliance, audit, and dispute resolution purposes.

To protect the integrity and security of gaming operations, the Company maintains appropriate technical and organisational safeguards, including:

- identity verification and user authentication controls;
- encrypted communication protocols for data exchange;
- continuous monitoring of gaming transactions and system activity;
- automated logging and maintenance of audit trails;
- incident detection and response procedures;
- backup, business continuity, and disaster recovery measures.

Information relevant to individual games, including applicable rules, wagering limits, payout structures, jackpot conditions, and Return to Player (RTP) values, where applicable, is provided by the respective gaming supplier and displayed through the Platform or within the relevant game interface.

The Company performs due diligence before establishing relationships with gaming suppliers and periodically reviews those relationships to ensure continued compliance with applicable licensing requirements, technical standards, responsible gaming obligations, anti-money laundering measures, and other regulatory requirements.

3. Quality monitoring and testing

3.1. RNG certification and testing

To ensure the fairness and integrity of the gaming products offered on the Platform, the Company integrates games only from approved gaming providers whose Random Number Generator (RNG) systems and gaming software have been independently assessed and certified by recognised Accredited Testing Laboratories (ATLs). Such laboratories may include, without limitation, Gaming Laboratories International (GLI), iTech Labs, eCOGRA, BMM Testlabs, and other recognised testing or certification bodies.

3.2. Vulnerability Assessments and Penetration Testing

The Company maintains an information security framework that incorporates ongoing monitoring and regular security testing designed to safeguard its systems, network infrastructure, applications, and player information.

As part of this framework, vulnerability assessments and penetration tests are conducted periodically by appropriately qualified internal personnel and/or independent external security specialists. These assessments are intended to identify, evaluate, and address security weaknesses that could affect the confidentiality, integrity, or availability of the Company's information assets.

Any vulnerabilities identified during the assessment process are documented, evaluated according to the Company's risk management methodology, and remediated in accordance with the Company's Information Security Policy and Incident Management procedures.

4. Data protection and storage

The Company has implemented a Privacy Policy that forms part of its overall data protection framework and governs the collection, use, storage, disclosure, retention, and international transfer of personal data. The Privacy Policy also describes the categories of personal information processed, the purposes for which such information is used, the rights available to data subjects, the Company's approach to cookies and similar technologies, and other applicable privacy requirements.

The Privacy Policy is published on the Company's websites and is reviewed periodically to ensure that it remains consistent with applicable legal, regulatory, and operational requirements.

4.1. Data protection

The Company applies appropriate technical and organisational measures to ensure that personal and operational information is processed securely and that its confidentiality, integrity, and availability are maintained throughout the data lifecycle.

Personal data is processed only where required for legitimate business operations and compliance purposes, including customer registration and account administration, identity verification, payment processing, responsible gaming measures, anti-money laundering controls, fraud prevention activities, customer support, and the fulfilment of regulatory reporting obligations.

Access to personal information is restricted to authorised personnel on a strict need-to-know basis through role-based access controls. Employees and third-party service providers who are permitted to access confidential information are contractually required to observe applicable confidentiality and data protection obligations.

To maintain an appropriate level of information security, the Company implements measures that may include:

- continuous monitoring, logging, and audit controls;
- role-based authentication and access management;
- incident detection, reporting, and response procedures;
- encryption of data transmitted across communication networks;
- protection of network infrastructure and supporting systems; and
- periodic security assessments and vulnerability testing.

4.2. Data storage and retention

The Company maintains electronic records relating to customer accounts, gaming activity, financial transactions, KYC documentation, AML records, and operational logs in secure storage environments.

Information is retained on infrastructure operated by the Company and/or authorised third-party service providers. Appropriate technical and organisational safeguards are implemented to preserve data integrity, ensure availability, and prevent unauthorised access, disclosure, modification, or loss.

Customer identification records and transaction data are retained in accordance with applicable legal, licensing, regulatory, and anti-money laundering requirements. Unless a longer retention period is prescribed by applicable legislation or a competent authority, such records are maintained for a minimum period of five (5) years following the termination of the customer relationship or completion of the relevant transaction.

Upon expiration of the applicable retention period, the information is securely deleted, anonymised, or transferred to archival storage in accordance with the Company's internal record retention procedures and applicable legal requirements.

4.3. Data breach and incident management

The Company maintains documented procedures for the detection, assessment, investigation, documentation, and management of information security incidents, including suspected or confirmed personal data breaches.

Where notification is required under applicable legislation or regulatory obligations, the Company will inform the competent authorities and, where applicable, affected individuals within the prescribed timeframes. Following the investigation of an incident, appropriate corrective and preventive measures are implemented to reduce risk, strengthen security controls, and minimise the likelihood of recurrence.

5. Visual interface specifications

5.1. Website Interface and Mandatory Compliance Information

The Company's website incorporates the compliance and player protection information required under the applicable regulatory framework. This includes, among other elements, the mandatory age restriction notice ("18+ Only"), the official Curaçao Gaming Authority (CGA) seal, and direct access to the Responsible Gaming Policy.

5.2. In-Game Session Information

Throughout an active gaming session, the user interface displays key account and session information in real time, including the player's current account balance, any active bonus information, and the elapsed duration of the gaming session.

6. Access control and banned persons exclusion

6.1. GeoIP geolocation blocks and restricted jurisdictions

To comply with applicable licensing, regulatory, sanctions, and anti-money laundering requirements, the Company applies a combination of technical controls and customer due diligence measures designed to prevent access to the Platform from jurisdictions in which its services are prohibited, restricted, sanctioned, or otherwise unavailable.

The control framework may include geolocation technologies, Know Your Customer (KYC) procedures, IP address verification, payment method screening, device identification tools, and ongoing risk monitoring.

The Company verifies a customer's location through GeoIP technology together with other available location verification tools during key stages of the customer relationship, including account registration, login, and gameplay. Where a customer is identified as residing in, accessing the Platform from, or otherwise connected with a restricted jurisdiction, access to the Platform may be denied, restricted, suspended, or blocked in accordance with applicable legal and regulatory requirements.

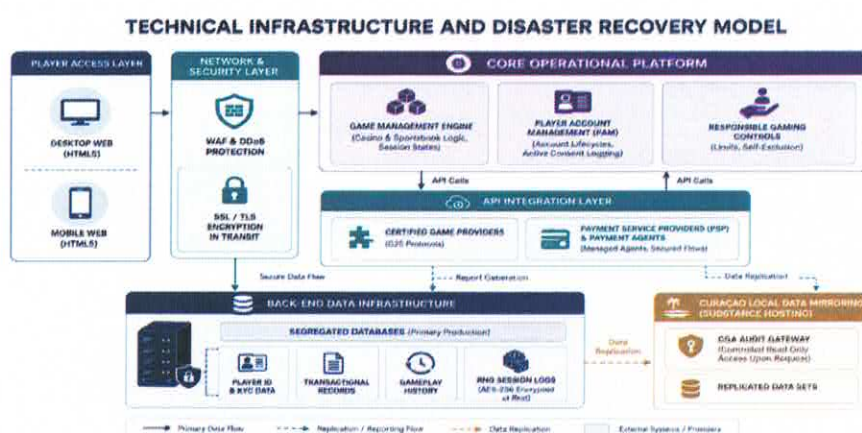
In addition to geolocation controls, customer verification and due diligence procedures are used to determine the customer's country of residence for the purposes of complying with licensing, AML, sanctions, and other applicable regulatory obligations.

The Company's approach to restricted and prohibited jurisdictions is based on an internal jurisdiction framework developed with reference to applicable legislation, licensing requirements, sanctions regimes, and internal risk assessment criteria. This framework is reviewed and updated whenever necessary.

Customers located in prohibited jurisdictions are not permitted to register an account, deposit funds, place wagers, or otherwise access the Company's gaming services. Attempts to circumvent geographical or identity-based restrictions through VPN services, proxy servers, anonymisation tools, inaccurate information, or similar methods may result in account suspension or closure, forfeiture of funds or winnings where permitted by applicable law, and any other measures considered necessary to ensure regulatory compliance.

7. Technical infrastructure and disaster recovery

This section describes the Company's technical environment, system architecture, data management processes, compliance-related technical controls, and disaster recovery arrangements supporting its licensed gaming operations. The information is provided to demonstrate compliance with the requirements of Article 5.9 of the National Ordinance on Games of Chance (LOK) under the regulatory oversight of the Curaçao Gaming Authority (CGA).



7.1 Technical Infrastructure and System Architecture

The Company maintains a secure, resilient, and auditable technical infrastructure to support the continuous operation of its gaming platform and its regulatory obligations.

The production environment is organised into several functional layers, as illustrated in the system architecture diagram, including:

- **Network & Security Layer** – provides network protection through Cloudflare Web Application Firewall (WAF), DDoS mitigation services, and SSL/TLS encryption for data transmitted across the Platform.

- **Player Interface Layer** – comprises the Desktop Web and Mobile Web (HTML5) interfaces through which players access the Platform.
- **Core Operational Platform** – includes the Game Management Engine responsible for casino and sportsbook operations and session management, the Player Account Management (PAM) system managing player account lifecycles and consent records, and integrated Responsible Gaming controls.
- **Back-end Data Infrastructure** – consists of segregated production databases storing player identification data, KYC documentation, gameplay history, transactional records, and RNG session logs.
- **API Integration Layer** – supports secure communication with certified Game Providers and Payment Service Providers (PSPs) or Payment Agents using certified G2S protocols and REST APIs for the exchange of operational and transactional data.

The Company's production, staging, and development environments operate separately from one another. The system architecture diagram forms part of this Operational Manual as a standalone annex and may be updated whenever material modifications are made to the underlying technical infrastructure.

7.2 Games of Chance, Payments, Software, and Outcome Determination

The Platform provides access to a variety of Games of Chance supplied by licensed and certified gaming software providers integrated into the Company's operating environment. The gaming portfolio includes, among other products, slot games, table games, live casino games, sports betting, virtual sports, jackpot games, instant win games, and other online gaming products.

Depending on the type of Game of Chance offered, outcomes are determined using certified Random Number Generators (RNGs), live dealer gaming procedures, official sports data feeds, progressive jackpot mechanisms, virtual sports engines, or other approved outcome determination technologies operated by the respective gaming provider.

The Platform supports multiple payment methods, including electronic payment solutions, bank transfers, and alternative digital payment methods processed through authorised payment agents. Minimum and maximum betting limits, game rules, payout structures, and other game-specific parameters are established within the Platform's controlled technical configuration and the contractual arrangements governing the relationship with each gaming provider.

7.3 Disaster Recovery and Technical Emergency Restoration

Where a material incident affects the availability of the Platform, the Company may, where applicable and in accordance with regulatory requirements, notify the relevant supervisory authority through the designated communication channels, including the CGA online portal.

The Company's disaster recovery arrangements are periodically tested as part of its internal control framework. Where such testing is performed, the activities may be documented and the results retained for governance, internal review, and audit purposes.

8. Responsible gaming policy

The Company has adopted a Responsible Gaming Policy in accordance with applicable regulatory requirements as part of its overall compliance framework. The Policy has been submitted to the Curaçao Gaming Authority (CGA) as part of the Company's licensing documentation and forms an integral component of its regulatory framework. The principal responsible gaming measures implemented by the Company are outlined below:

8.1. Underage gambling prevention (Zero Tolerance)

Minimum Age Requirement: Individuals under the age of eighteen (18) are strictly prohibited from registering an account or participating in any gambling activities offered by the Company.

Customer Verification: During the onboarding process, the Company verifies each customer's identity and age using valid identification documents, such as passports, national identity cards, or driving licences. Where appropriate, additional verification methods, including automated verification tools, artificial intelligence solutions, or third-party data sources, may be used.

Procedure for Underage Players: Where a customer is identified as being under the legal gambling age, the relevant account is immediately suspended and permanently closed. Any winnings are automatically forfeited. Deposited funds are refunded within two (2) business days unless the funds are subject to a temporary freeze as part of an ongoing AML or fraud investigation. A report concerning the incident is submitted to the relevant regulatory authority within five (5) working days.

8.2. Player protection tools and limits

The Platform makes available a range of responsible gaming tools that allow players to manage their gambling activity. Customer support personnel are

expected to understand the operation of these tools and the rules governing their application:

- **Session Time Limits:** Players may limit the duration of an individual gaming session in order to encourage regular breaks. This functionality is not available for sports betting.
- **Deposit Limits:** Players may establish maximum daily, weekly, or monthly deposit limits.
- **Loss Limits:** Players may determine the maximum amount they are prepared to lose during a selected period. Once the applicable limit has been reached, further gambling activity is automatically prevented until the relevant period expires. This functionality is not available for sports betting.
- **Wagering Limits:** Players may specify maximum wagering amounts for a selected period. This functionality does not apply to sports betting products.
- **Changes to Limits:** Any reduction of an existing limit takes effect immediately. Requests to increase or remove an existing limit become effective only after the mandatory waiting period of seven (7) days.

8.3. Cooling-Off and Self-Exclusion

- **Self-Exclusion (Long-Term or Permanent):** Players may voluntarily self-exclude for one (1) year, three (3) years, or permanently. The restriction applies across all brands and domains operated by the Company and covers both casino and sports betting products. Customer Support ensures that duplicate accounts and known payment methods are blocked to minimise the risk of circumvention.
- **Cooling-Off (Temporary Break):** Players may activate a cooling-off period of one (1) day, three (3) days, one (1) week, one (1) month, three (3) months, or six (6) months. Activation is immediate and does not require manual approval. During the cooling-off period, the player is prevented from making deposits, participating in games, or receiving marketing communications.
- **Reactivation:** Access may only be restored after the applicable self-exclusion period has expired. Before reactivation, the player must submit a written request, acknowledge the responsible gaming warnings, and complete the mandatory self-assessment questionnaire.
- **Procedure Following a Breach:** If a self-excluded player is found to have accessed the Platform, the account is immediately suspended, deposited funds are refunded within two (2) business days, and the incident is reported to the relevant authority within five (5) working days.

8.4. Behavior monitoring and chat assessment

The Company applies behavioural monitoring measures intended to identify potential indicators of problem gambling. Where customer support personnel identify signs of distress or concerning statements during a live chat interaction, the player is asked the following assessment questions:

- Have you ever felt you might have a problem with gambling?
- Have you ever borrowed money or sold anything in order to gamble?
- Has your gambling caused you to neglect your own welfare or that of your family?
- Have you ever gambled in an attempt to obtain money to repay debts?
- Have you experienced health problems as a consequence of gambling?
- Have you ever experienced feelings of guilt after completing a gambling session?

The response provided by the player will assist the customer support representative in directing the player to the appropriate responsible gaming tools available on the platform or, where appropriate, to professional support organizations.

8.5. Marketing restrictions and data audit

- **Data Retention:** For compliance and regulatory audit purposes, records relating to age verification, self-exclusion, and customer support interventions are securely retained for a minimum period of seven (7) years.
- **Marketing Restrictions:** Promotional materials must not misrepresent the likelihood of winning, portray gambling as a solution to financial difficulties or a source of income, or target self-excluded customers or individuals identified as financially vulnerable. Furthermore, high-risk casino products must not be promoted to persons under the age of twenty-five (25).

9. General terms and conditions

The Company maintains Terms and Conditions governing the use of its websites and gaming services, which establish the contractual relationship between the Company and its customers. The Terms and Conditions regulate, among other matters, customer eligibility, account registration, deposits and withdrawals, bonus offers and promotional activities, responsible gaming requirements, prohibited conduct, account suspension or closure, and the process for resolving customer disputes.

Customers are required to review and accept the Terms and Conditions before accessing the Company's gaming services. The applicable Terms and Conditions are published on each licensed website operated by the Company and are presented for acceptance during the account registration process.

The Company reviews the Terms and Conditions periodically and may revise them to reflect changes to its services, operational practices, or applicable legal and regulatory requirements. The current version is made available at all times on the relevant website.

By accepting the Terms and Conditions, the customer enters into a legally binding agreement with the Company.

10. Player dispute resolution framework

The Company maintains a Player Complaints and Dispute Resolution Policy governing the receipt, assessment, investigation, and resolution of customer complaints and disputes. The Policy forms part of the Company's overall compliance framework and has been submitted to the Curaçao Gaming Authority (CGA) as part of the Company's licensing and regulatory documentation.

10.1. Introduction and regulatory framework

This section describes the procedures followed by Carrer N.V. (the "Company") when receiving, reviewing, and resolving player complaints. The complaints handling framework has been established in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

These procedures apply to all complaints submitted by players concerning their use of the Company's gaming services or any aspect of their participation in the games of chance offered through the Platform.

10.2. Definition of a complaint (Incident)

For the purposes of this Policy, a complaint (incident) means any action, omission, technical issue, or system-related event that a player considers to have negatively affected their interaction with the Company or their participation in games of chance.

Complaints may relate to, including but not limited to:

- account restrictions, suspensions, or closures;
- disputes concerning bonuses, game outcomes, or settlement of bets;

- technical malfunctions, system errors, or platform performance issues;
- deposits, withdrawals, or unsuccessful payment transactions.

10.3. Procedure for complaints (Incidents) and operational timelines

- 1. Complaint Submission:** Players may submit complaints free of charge using the communication channels made available by the Company:
 - Live Chat: interactive customer support available on the website 24 hours a day, 7 days a week.
 - Email: submission directly to the Customer Support team.
- 2. Acknowledgement:** Upon receipt, each complaint is acknowledged without delay and assigned a unique reference number, enabling the player to monitor the progress of the case.
- 3. Resolution and Decision Timelines:**
 - **Initial Response:** The Company provides its first substantive response or status update within seventy-two (72) hours of receiving the complaint.
 - **Final Decision:** The Company communicates its final decision within ten (10) business days from the date the complaint was submitted.
 - **Extended Review:** Where additional investigation is required, including matters involving external service providers or detailed financial or technical reviews, the resolution period may be extended by up to four (4) additional weeks. The player will be informed of the extension in advance. The final communication will either provide the reasons supporting the decision reached or explain why the complaint has been rejected.
- 4. Responsible Gaming Complaints:** Complaints concerning Responsible Gaming matters receive the highest operational priority and are handled in accordance with the Company's responsible gaming procedures.

10.4. Alternative Dispute Resolution (ADR)

If a player remains dissatisfied after the Company's internal complaint procedure has been completed, the complaint may be referred to a certified Alternative Dispute Resolution (ADR) provider. The Company undertakes to establish formal arrangements with certified ADR providers once the official register of approved entities becomes available.

Players may access ADR services free of charge. Details of the applicable ADR provider are included in the General Terms and Conditions and published on the Company's website.

10.5. Escalation to the Curaçao Gaming Authority (CGA)

Where a player believes that the Company has failed to comply with its regulatory obligations under the LOK, the matter may be reported through the official online reporting system of the Curaçao Gaming Authority (CGA). The Company acknowledges that the CGA acts as the supervisory authority and does not determine or resolve disputes relating to individual gambling transactions or player-specific gaming outcomes.

10.6. Record-Keeping and Bi-Annual Regulatory Reporting

Data Retention: The Company securely maintains records relating to player complaints, communication history, internal case summaries, and system log extracts for a minimum retention period of five (5) years.

Bi-Annual Reporting Obligations: The Company prepares and submits compliance reports to the Curaçao Gaming Authority (CGA) twice each calendar year, specifically on **15 January** and **15 June**. Each report includes:

- the total number of complaints received during the reporting period;
- the number of complaints that remain pending or unresolved;
- the number of complaints resolved during the reporting period, including a breakdown of settled and rejected cases;
- a categorisation of complaints by their principal operational subject matter;
- the number of complaints referred to Alternative Dispute Resolution (ADR) bodies together with the outcome of those referrals; and
- the number and details of complaints that resulted in external legal proceedings initiated by a player against the licensee.

11. Digital record and local server

The Company maintains a secure data replication process that continuously synchronizes essential cloud-hosted information with a local physical storage environment.

The local hosting infrastructure is located within a Tier IV certified data centre in Curaçao. The replicated dataset includes key customer information (including Sumsb KYC records), gaming audit data (including individual wagers, transaction timestamps, and RNG outcomes), as well as financial transaction records comprising deposits, cash-out executions, and transaction hashes.

This technical architecture provides the Curaçao Gaming Authority (CGA) with real-time, read-only access to the replicated information for regulatory monitoring and compliance verification purposes.



(SMES) Solutions for Management and Employment Support N.V.

Managing Director

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