

SilverDeer B.V.

Crypto Usage Policy

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Approver	Odin Trust B.V. (Director)
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1. INTRODUCTION

Silverdeer B.V. is committed to ensuring safe, secure, and compliant operations concerning cryptocurrency payments and transactions within its online gambling services. This Crypto Usage Policy defines the approach Silverdeer B.V. employs in handling cryptocurrency-related risks, particularly in the areas of verification, transaction monitoring, AML compliance, data security, and fraud prevention.

2. SCOPE AND PURPOSE

This policy applies to all cryptocurrency transactions processed by Silverdeer B.V. and extends to all personnel involved in the handling, monitoring, and processing of these transactions.

3. RISK MANAGEMENT MEASURES

3.1 Verification Process

Silverdeer B.V. implements a stringent customer verification process to ensure that all users engaging in cryptocurrency transactions are accurately identified. Verification measures include collecting relevant information from users during onboarding, such as proof of identity and residence.

Enhanced verification is performed for users identified as high-risk, which may include politically exposed persons (PEPs) or users with unusual transaction patterns. This process is periodically reviewed to maintain alignment with regulatory standards and industry best practices.

Responsible persons shall ensure that verification measures are consistently applied and adjusted as necessary to account for the evolving nature of cryptocurrency risk.

The verification process shall be conducted in accordance with the company's AML/CFT Policies.

3.2 Transaction Monitoring

Silverdeer B.V. uses advanced monitoring systems to review cryptocurrency transactions in real time, ensuring the detection of anomalies or patterns associated with potential money laundering or fraudulent activity.

Each transaction undergoes screening based on transaction limits, frequency, and known cryptocurrency red flags, including rapid, high-value deposits and withdrawals, frequent transfers between accounts, and usage of privacy-centric cryptocurrencies.

Automated alerts are generated for suspicious activity, which is escalated to the Money Laundering Reporting Officer (MLRO) for further review and potential reporting to the Financial Intelligence Unit Curaçao (FIU).

The transaction monitoring and escalation the suspicious activity shall be conducted in accordance with the company's AML/CFT Policies.

3.3 Anti-Money Laundering (AML) Compliance

Silverdeer B.V. aligns its AML program with local regulations. Specific AML controls include mandatory identity verification, source of funds verification, and enhanced due diligence for transactions exceeding pre-defined limits. The company also ensures that all employees are trained on AML protocols related to cryptocurrency handling.

Suspicious Activity Reports (SARs) are filed promptly for any transactions suspected of involving money laundering. The AML process is audited periodically to verify the efficacy of controls and identify any necessary improvements.

3.4 Data Security and Privacy

All data related to cryptocurrency transactions is stored securely. This includes encryption of sensitive data, secure access controls, and regular security assessments to prevent unauthorized access and breaches.

Silverdeer B.V. complies with GDPR and other data privacy laws, ensuring the lawful processing and storage of personal data collected during customer verification and transaction monitoring.

Regular audits of data security measures are conducted to identify and mitigate any vulnerabilities in the system. Responsible persons shall ensure that data security controls align with Silverdeer B.V.'s Privacy Policy and regulatory obligations.

3.5 Anti-Fraud Measures

The company implements fraud detection systems to identify and prevent fraudulent activity associated with cryptocurrency transactions. This includes IP tracking, device monitoring, and behaviour analytics.

Manual reviews are conducted on flagged transactions, and suspicious accounts are promptly frozen pending investigation. Silverdeer B.V. reserves the right to terminate accounts in cases where fraud is confirmed, with all actions documented in compliance with regulatory reporting requirements.

Responsible persons shall oversee the continuous improvement of fraud prevention measures, considering the dynamic risks associated with cryptocurrency and adapting controls as necessary.

4. GOVERNANCE

4.1 Independent Audit

An independent audit of Silverdeer B.V.'s cryptocurrency policies and AML framework is conducted annually to evaluate effectiveness, compliance, and risk management practices related to cryptocurrency usage.

The audit covers all relevant aspects, including verification, transaction monitoring, AML compliance, data security, and fraud prevention. Findings from the audit are used to enhance and refine policies and procedures to address any identified gaps or risks.

4.2 Review and Updating of the Policy

This policy is reviewed annually by the MLRO and is updated to reflect changes in regulatory requirements, technological advancements, or company-specific needs.

Updates are communicated to all employees, who are required to acknowledge any new guidelines or procedures introduced as part of this policy.

5. STAFF TRAINING AND AWARENESS

All relevant staff receive mandatory training on the specific risks, controls, and procedures associated with cryptocurrency transactions. Training sessions cover the identification of red flags, proper transaction monitoring protocols, data security requirements, and AML procedures tailored to cryptocurrency usage. Silverdeer B.V. ensures that employees understand their responsibilities under this policy, including when and how to escalate suspicious activity to the MLRO. Refresher training sessions are conducted annually or as needed, based on updates to the policy or changes in regulatory requirements.

The training program includes assessments to measure staff comprehension and readiness to manage cryptocurrency-related risks. Employees failing to demonstrate adequate understanding may be subject to additional training sessions or disciplinary actions.

6. REPORTING AND ESCALATION

All staff are required to report any suspicions regarding cryptocurrency transactions immediately to the MLRO. Reporting mechanisms include direct reporting channels and escalation procedures in line with Silverdeer B.V.'s AML Policies.

The MLRO is responsible for investigating and, where necessary, filing SARs with the FIU. All reports are documented, stored securely, and handled in a manner that protects confidentiality and prevents tipping off.

Internal reporting guidelines are periodically reviewed to ensure alignment with regulatory expectations and industry best practices. The MLRO oversees compliance with reporting standards, reviewing and enhancing protocols as required.

7. REGULATORY COMPLIANCE AND SANCTIONS SCREENING

Silverdeer B.V. screens all cryptocurrency transactions and counterparties against international sanctions lists and local regulatory requirements to prevent engagement with prohibited entities or individuals.

Sanctions checks are conducted in real-time through automated systems, and all flagged transactions are halted pending review by the MLRO.

In cases of confirmed matches to sanctions lists, the company undertakes appropriate action, including freezing transactions and notifying relevant authorities in compliance with the applicable laws of Curaçao.

8. RECORD KEEPING

Silverdeer B.V. maintains accurate and complete records of all cryptocurrency transactions, verification documents, monitoring activity, and SARs for a minimum of five years, in compliance with Curaçao's AML regulations.

Transaction data, verification records, and other relevant documents are stored securely to ensure data integrity, confidentiality, and ease of access for regulatory audits.

Records are periodically reviewed for completeness and accuracy, with the MLRO overseeing compliance with all record-keeping requirements. Data retention schedules are strictly enforced to align with legal and regulatory obligations.

9. POLICY BREACHES AND DISCIPLINARY ACTIONS

Non-compliance with this Crypto Usage Policy, including failure to adhere to verification, monitoring, AML, data security, or fraud prevention protocols, may result in disciplinary action, up to and including termination of employment.

Any violations identified during internal audits, transaction monitoring, or regulatory reviews are escalated to the Compliance Department, which assesses and enforces appropriate remedial actions.

The MLRO is responsible for ensuring all breaches are documented and corrective measures are implemented.

Repeated offences or significant breaches may lead to further legal action or sanctions, depending on the severity of the violation.