

Responsible Gaming Policy - Paloma Media

1. Introduction and Policy Statement

Paloma Media believes in promoting a responsible approach to gambling and is fully committed to fostering a culture of safe and informed play. We recognize that the responsibility for preventing gambling-related harm is a shared one—among the industry, government, and the wider community. It's essential that support services are accessible to individuals who may experience gambling problems.

For most people, gambling is a fun, recreational activity and a form of entertainment. However, we understand that for a small portion of individuals, gambling can lead to serious personal challenges. That's why Paloma Media has developed this Responsible Gambling Policy—to outline the practices and safeguards we have put in place when offering services to our players.

We are committed to staying aligned with broader industry efforts on addressing problem gambling. As part of our internal policies, all team members receive responsible gambling training as part of their onboarding process, followed by annual refresher training to maintain awareness and best practices.

Paloma Media's Responsible Gaming information is available in English and the language(s) of our target market.

2. Responsible Gambling

Responsible gambling means participating in gaming activities in a way that minimizes the risk of harm. Paloma Media respects the rights of our players to enjoy our services, and we encourage each individual to take ownership of their gaming behavior. At the same time, we understand our responsibility to equip players with relevant tools and information to support their wellbeing.

Our goal is to ensure that players make informed choices while using our platform. Where assistance is needed, we are committed to facilitating access to professional gambling help services.

Furthermore, Paloma Media does not offer credit for gambling and does not portray gambling as an investment or solution to financial problems.

3. Problem Gambling

Problem gambling arises when someone loses control over their gaming behavior—especially when it affects the frequency, duration, or financial impact of their gambling.

A player may be experiencing a gambling issue if they find themselves spending more time and money than intended, hiding their behavior from others, or borrowing funds to cover basic expenses. Some players may lose interest in hobbies or daily responsibilities, experience work or home life disruptions, or struggle to take breaks during long gambling sessions.

The negative effects can include financial hardship, emotional strain on the player and their loved ones, and decreased work performance.

Paloma Media aims to strike a balance in the delivery of gambling services—supporting those who enjoy our platform for entertainment while also considering the wellbeing of players who may be at risk, as well as their families and the wider community.

4. Player Protection Measures

To prevent and reduce the risks associated with problem gambling, we've put a range of measures in place to support our players.

Our Responsible Gaming Policy and tools (self-exclusion, deposit limits, etc.) are referenced and accessible through the Terms & Conditions.

4.1 Responsible Gambling Page

Our dedicated Responsible Gambling page offers useful information and guidance, including our stance on underage gambling, tools for parental controls, self-assessment resources, self-exclusion functionality, deposit limits, and access to professional support services.

4.2 Self-Exclusion

Self-exclusion is a recognized way for players to regain control over their gambling habits. Paloma Media offers several self-exclusion options for players who feel that they need assistance stepping away from the platform.

In certain cases, our team may take proactive action. For instance, if a player communicates financial difficulty linked to their gambling, this may prompt our player support team to investigate further and take the appropriate steps to ensure the individual's wellbeing.

Players can request self-exclusion by contacting customer support via live chat or email (service@cafecasino.lv), or by accessing the Responsible Gambling link in the website footer.

Self-exclusion requests submitted through the website are activated immediately, while those sent via customer support are typically processed within 24–48 hours, players will receive confirmation once completed.

We make every effort to block existing accounts and prevent the creation of new ones by players who have opted to self-exclude.

We offer the following self-exclusion options:

Cool-Off: This allows players to temporarily close their accounts for a minimum of 72 hours. During this time, any attempt to create a new account will be blocked. The account cannot be reopened under any circumstances until the selected period expires.

Temporary Self-Exclusion: This enables a player to close their account for a minimum of one year. During this period, the player will not receive any promotional content, and duplicate accounts will be blocked. The account cannot be reactivated until the exclusion period ends and the player reaches out to request reactivation.

Permanent Self-Exclusion: This option results in the permanent closure of the player's account. All marketing communications will cease, and any attempts to register new accounts will be blocked. Players should withdraw any remaining funds before initiating permanent exclusion.

When a player chooses permanent exclusion, reactivation is not possible under any circumstances. For temporary exclusions, the account will not be reactivated automatically when the exclusion expires—the player must contact Paloma Media to resume access.

4.3 Deposit Limits

To help players manage their spending, we offer the option to set daily, weekly, or monthly deposit limits. Players can establish these limits by contacting customer support through live chat, email, or phone. Reductions to limits take effect immediately.

If a player wishes to increase or remove their deposit limits, the request will only be implemented after a 24-hour cooling-off period.

4.4 Self-Assessment

Players who suspect they may be developing a gambling issue are encouraged to use the self-assessment checklist available on our Responsible Gambling page. This tool offers insight into patterns of behavior that may indicate a problem.

We also recommend taking the Gamblers Anonymous 20 Questions self-assessment, available at <https://gamblersanonymous.org/20-questions>

In addition, we provide links to professional resources for further guidance:

www.ncpgambling.org

www.gamblingtherapy.org

4.5 Underage Gambling

Paloma Media does not permit any individual under the age of 18 to access or use our services. Age verification measures are in place, including a mandatory age confirmation tick box at registration and the requirement for players to submit personal information (such as date of birth) to validate their age.

We also work with third-party verification providers to support these checks and ensure compliance. Our marketing strategies are carefully designed to avoid targeting minors. If you suspect someone underage is using our services, we urge you to report it via live chat or email.

4.6 Gambling History

Players can view their gambling history, including deposits and withdrawals, through the “My Account” section. If more detailed records are needed, they can be obtained by contacting customer support.

We monitor player behavior for signs of potential gambling harm. Some indicators include session duration, total amount wagered, patterns of wins and losses, and account due diligence status.

If concerns are identified, the matter is escalated to management, who may reach out to the player via email or phone to check in. The aim is to understand whether the player is comfortable with their current gambling activity and whether they’ve reviewed our responsible gambling information.

If no contact is made or the response is unsatisfactory, the account may be temporarily suspended until we confirm that the player is in control of their gambling.

4.7 Account Balance

Players can always see their current account balance at the top of their screen. When actively playing, the balance shown in-game is updated throughout the session, and the full balance reflects any changes once the session ends.

4.8 Duplicate Account Prevention

During the registration process, we screen player details against our database. If duplicate information is identified, the new account will not be created, and the player will be prompted to contact customer support for assistance.

We regularly review account activity to ensure that multiple accounts are not being used to bypass responsible gambling measures.

5. Affordability

Affordability is a core component of Paloma Media’s commitment to responsible gambling. We want to ensure that players are only gambling within their means, and our monitoring tools help detect behaviors that may indicate harmful or unaffordable play.

We evaluate a combination of financial, behavioral, and risk-based indicators, such as known income levels, employment status, deposit and spending trends, and behaviors like frequent large bets or chasing losses.

Affordability checks aren't meant to exclude players arbitrarily—they are intended to guide proportionate, risk-based actions. Based on our findings, we may request additional information, place limits on the account, or take steps to restrict access if necessary.

Financial circumstances can change over time, so ongoing monitoring remains essential. At the same time, we strive to keep our communication with players open and respectful, helping them understand the purpose behind these checks while giving them tools to take control of their own gaming experience.

6. Complaints Handling

At times, when a player requests self-exclusion, they may also seek compensation for previous losses. In such cases, the matter is escalated to management for review, and any decisions made are clearly communicated to the player via email.

In exceptional situations, the issue may be referred to senior management for further evaluation. If a customer support team member becomes concerned about a player's gambling behavior, they are encouraged to initiate a respectful conversation to determine whether the player might be gambling beyond their means.

These conversations may be prompted by specific signs, such as repeated bonus requests, frequent attempts to raise deposit limits, or other patterns that could indicate problematic behavior.

If a player requests permanent account closure and later attempts to register a new account using slightly modified details, the duplicate account will be identified, all deposits reversed, and any bets voided.

Any message from a player that includes threats of self-harm or legal action must be escalated to senior management immediately. Additionally, if a team member feels uncertain or believes an issue could become problematic later on, they are encouraged to escalate the matter without hesitation.

7. Advertising and Marketing

Paloma Media ensures that all advertising and marketing efforts comply with relevant laws, regulatory guidelines, and industry standards. Our promotional activities are designed to be socially responsible, transparent, and sensitive to the diverse needs of our player community, always prioritizing player safety and well-being. All advertising includes a responsible gaming message or slogan, promoting awareness and encouraging safe gaming practices.

Additionally, all marketing partners and affiliates must agree and adhere to our Responsible Gaming standards, ensuring consistent and responsible messaging across all platforms.

Players who are currently under a period of temporary or permanent self-exclusion due to problem gambling are automatically removed from all marketing communications. We do not send promotional emails or materials to excluded players under any circumstances, as part of our ongoing commitment to responsible gambling practices.

8. Staff Training and Support

All staff at Paloma Media undergo comprehensive training on responsible gambling during their initial onboarding and receive annual refresher sessions to stay current with best practices.

We also prioritize staff wellbeing. Team members who have difficult conversations with players experiencing gambling-related challenges—or who may feel they need support for their own gambling habits—are encouraged to seek help. Support is available through Gamblers Anonymous, either with managerial support or in complete confidence.

The Compliance Officer, Curleigh Cochrane, is responsible for the implementation of the Responsible Gaming Policy and reports to the Management Team, at least once yearly, on the policy's effectiveness, improvements, and updates made.

Paloma Media's management team has reviewed and approved the Responsible Gaming Policy and continuously monitors its effectiveness.