

Cryptocurrency Policy

Crypto Transaction Acceptance Policy

Introduction

This Cryptocurrency Policy (hereafter referred to as the “policy”) explains how Paloma Media (collectively, “Paloma Media”, “us”, “we”, “our”) ensures the safety and legality of all cryptocurrency transactions on our platform.

This policy, alongside our Know Your Customer (KYC) and Anti-Money Laundering (AML) procedures, is designed to prevent illegal activities like money laundering and financing of terrorism. All cryptocurrency deposits will be thoroughly checked to ensure they come from legitimate sources.

2. Cryptocurrency Transaction Monitoring

To protect all players, we use advanced blockchain analysis tools to monitor cryptocurrency deposits. These tools include:

<https://www.chainalysis.com/>

<https://crystalblockchain.com/>

<https://www.scorechain.com/>

These tools analyze the origin of funds and assign a risk score to each transaction. If any deposit is flagged as suspicious, we will review it to ensure it is not linked to illegal or criminal activity.

3. Risk Scoring & Acceptance

Each cryptocurrency deposit is analyzed for risk. If the deposit is flagged with a high-risk score, it may be rejected or further investigated. The following guidelines apply:

- We will not accept funds of any amount that score above **80%** risk on any of the above platforms. In the event that multiple cryptocurrency analysis tools are utilized for risk scoring, a rating above 80% on a single analysis platform shall be enough to trigger the rejection.
- We will not accept any deposit of funds above **NAF(ANG) 5,000.00** that have a risk score of between **60 to 80%**.
- Will not accept any deposit of funds below **NAF(ANG) 5,000.00** that have a risk score of between **60 to 80%** without additional Source of Funds information of a type deemed acceptable by the Compliance Team. This is at our absolute discretion and includes but is not limited to; secondary ID, bank statement(s), a credit check, company accounts from a business owned by the player or a reference letter from a bank or a professional reference or from a lawyer or a certified accountant.

4. Risk Mitigation Measures

To mitigate the risks associated with cryptocurrency transactions, we have implemented the following measures:

- **Transaction Limits:**
 - Daily Deposit Limit: We set a daily limit for cryptocurrency deposits. For most users, there is maximum daily deposit limit.
 - Transaction Frequency Limit: To reduce rapid deposits from suspicious sources, we limit the frequency of deposits. Multiple deposits in a short time frame from the same address or wallet may trigger a review.
- **Reporting Requirements:**
 - Any cryptocurrency deposit above **NAF(ANG) 5,000.00** will automatically be flagged for enhanced due diligence. This includes verifying the source of funds and may involve requesting additional documentation.
 - Transactions that appear to have links to criminal activity, sanctions lists, or unusual patterns will be reported to relevant authorities, in compliance with local and international regulations.
- **Transaction Reversal or Freeze:**
 - If we identify a high-risk deposit or any transaction suspected of illegal activity, we reserve the right to reverse the transaction or freeze the funds until a full investigation is completed.
 - A temporary hold may be placed on a player's account if their deposit is under investigation, and they will be notified.

5. Compliance Team Review

Our Compliance Team is responsible for reviewing all high-risk transactions. If a deposit is linked to illegal activities, terrorism financing, or is from a sanctioned source, it will be rejected and may be reported to relevant authorities. In cases where the risk is unclear or additional verification is needed, the Compliance Team will engage with the player to request more information.

6. Special Note on Gambling Transactions

We understand that gambling-related transactions may trigger a higher risk score due to the nature of online gaming. Our Compliance Team will manually adjust risk scores, where applicable, to account for the gambling activity associated with the transaction. This ensures that gaming activity itself does not unnecessarily inflate the risk score.

7. Transparency and Player Responsibility

- All cryptocurrency transactions must comply with our KYC and AML policies.
- Players should ensure that the funds they use are from legitimate sources. If necessary, players may be asked to provide additional documentation to confirm the source of their funds.

8. Changes to the Policy

We reserve the right to update or amend this Crypto Transaction Acceptance Policy at any time. Any significant changes will be communicated to players.

9. Contact Us

If you have questions about cryptocurrency transactions, need assistance, or wish to report a suspicious transaction, please contact our Customer Support team.

Key Points to Remember:

- All cryptocurrency deposits are monitored to ensure they come from legitimate sources.
- Deposit limits and transaction frequency limits are in place to help mitigate risks.
- Reporting requirements: Deposits over **NAF(ANG) 5,000.00** and suspicious transactions are reported to relevant authorities.
- Deposits may be rejected if their risk score is too high or if the source of funds cannot be verified.
- The Compliance Team handles any suspicious activity and may report concerns to authorities.