

KYC (Know Your Customer) Policy

[Your Company Name]

1. Policy Statement

Great Star N.V. ("the Company") is committed to maintaining the highest standards of integrity and transparency in line with Curaçao's regulatory framework. This Know Your Customer (KYC) Policy is designed to prevent fraud, money laundering, and the misuse of our platform by requiring proper identification and verification of our users.

2. Purpose

The main objectives of this policy are to:

- Verify the identity of customers to ensure they are who they claim to be.
- Prevent the platform from being used for illegal activities such as money laundering or terrorist financing.
- Comply with Curaçao eGaming regulatory requirements and recommendations from the Financial Intelligence Unit (FIU) Curaçao.
- Ensure responsible gaming and mitigate underage gambling.

3. Scope

This policy applies to:

- All new and existing customers of Great Star N.V.
- All departments involved in onboarding, monitoring, and compliance
- Third-party service providers involved in customer identity verification

4. Customer Due Diligence (CDD)

The Company requires all users to provide the following documents prior to engaging in any financial transactions (deposit or withdrawal):

- Government-issued photo ID (passport, national ID card, or driver's license)
- Proof of address (utility bill, bank statement, or government letter not older than 90 days)
- Selfie with ID (when necessary for enhanced verification)

For corporate clients or partners:

- Certificate of Incorporation
- Memorandum and Articles of Association
- Proof of business address
- Identification and proof of address for company directors and beneficial owners (owning 25% or more)

5. Age Verification

No user under the age of 18 is permitted to register or play. A user's date of birth must be verified at registration. Any user found to be underage will have their account permanently closed and all funds forfeited.

6. Enhanced Due Diligence (EDD)

EDD will be conducted in the following cases:

- High-risk countries or jurisdictions
- Politically Exposed Persons (PEPs)
- Unusual betting patterns or transaction behavior
- Large deposit or withdrawal amounts
- Cryptocurrency usage over a predefined threshold

EDD may involve:

- Requesting additional documents (e.g., source of funds or wealth)
- Video verification
- Manual review by compliance officers

7. Ongoing Monitoring

The Company implements systems to:

- Continuously monitor user activity for suspicious behavior
- Detect unusual betting or transactional activity
- Review and update customer data periodically
- Freeze or suspend accounts pending investigation if suspicious activity is detected

8. Use of Third Parties

The Company may employ reliable third-party KYC/AML service providers (e.g., Jumio, Sumsub, or Trulioo) to perform customer verification, provided they comply with Curaçao and GDPR standards.

9. Record-Keeping

Customer records and KYC documentation will be securely stored for a minimum of 5 years after the business relationship ends, in compliance with Curaçao FIU requirements.

10. Data Privacy

All personal and financial data collected during KYC procedures will be handled in accordance with the General Data Protection Regulation (GDPR) and Curaçao's data protection laws.

11. Non-Compliance and Consequences

If a customer fails to provide the requested KYC documents or information:

- The account may be suspended or restricted

- Withdrawal requests may be delayed or denied
- The matter may be reported to the appropriate authorities

12. Training & Awareness

All staff involved in onboarding and compliance will receive regular training on:

- KYC procedures
- AML/CTF red flags
- Customer interaction and data handling

13. Review and Updates

This policy will be reviewed at least annually or upon any regulatory changes. Updates will be communicated to all relevant personnel.

Effective Date: 27/01/2025

Next Review Date: 26/01/2026

Approved by: Risk & Fraud Manager - MLRO

Responsible Department: Compliance and Risk Management

A handwritten signature in black ink, appearing to be 'AB' with a long horizontal stroke extending to the left.