

Responsible Gaming Policy

CUPWIN B.V.

Approved by: Director, TETIANA BOIKO.

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Authorized Responsible Gaming Contact: support@winebet.com

Introduction to Responsible Gaming Policy

At CUPWIN B.V., we are committed to promoting a safe and enjoyable gambling experience for all our players. Gambling should be a form of entertainment, not a way to make money, and we recognize that, for some individuals, gambling can become a problem. This Responsible Gaming Policy is designed to provide our players with the tools and support they need to gamble responsibly, and to minimize the risks associated with excessive or addictive gambling behaviors.

We strive to protect vulnerable individuals, including minors and those who may be at risk of developing gambling problems. Our company is dedicated to ensuring that our services promote fair and responsible gambling, and we continually assess and improve our practices to align with industry best standards and regulatory requirements.

By offering a range of preventive measures and self-control tools, we aim to support our players in maintaining a healthy relationship with gambling, while also providing clear and accessible information about the risks involved. We encourage all our customers to be aware of their gambling habits and to seek help if needed.

This policy outlines the steps we take to ensure responsible gaming, including age verification, self-assessment tools, and measures for self-exclusion and cooling-off periods. Our goal is to provide a secure and responsible environment for all players, and we remain committed to player protection as a fundamental part of our services.

Age verification

Our customers should understand that they are the guarantors of their legal registration on our websites. We regularly carry out checks to determine the age of our customers to guarantee that all our players have reached the legal age. In some cases, our checks cannot confirm the customer's age, and we request the added information to confirm that the player has reached the legal age. Availability of a personal account may be limited, and funds may be frozen until we receive the necessary information, and the fact that you have reached the legal age will be confirmed unambiguously.

Information accessibility

We are committed to ensuring that all players have easy access to the necessary information regarding responsible gaming practices. The following measures have been implemented to enhance accessibility and promote transparency:

1. Responsible Gaming Section:

Our Responsible Gaming Policy and related tools are clearly outlined in a dedicated section on the website. This section provides detailed information about the risks associated with gambling, as well as available tools for managing gambling behavior such as self-assessment tests, deposit limits, and options for self-exclusion.

2. Homepage Accessibility:

Links to our Responsible Gaming section are prominently displayed on the homepage of our website. This ensures that players can easily find and access the information they need to make informed decisions about their gambling behavior. We strive to make these resources accessible to all players without unnecessary steps or barriers.

3. Terms & Conditions Inclusion:

Our website's Terms and Conditions explicitly reference responsible gambling practices. By accepting the Terms and Conditions, players acknowledge their responsibility to gamble responsibly and are informed of the tools and resources available to help manage their gambling habits.

4. Footer Information Requirements:

A link to our Responsible Gaming section is included in the footer of every page on our website, ensuring that players can easily access this information at any time during their interaction with the site. This makes the tools and policies available on every page without having to navigate away from the content being viewed.

We believe that making this information readily accessible is a crucial part of our commitment to promoting responsible gambling and ensuring a safe environment for all players.

Player self-assessments

To test the level of your gambling addiction, please answer “Yes” or “No” to the questions below:

- Did you ever lose time from work or school due to gambling?

- Has gambling ever made your home life unhappy?
- Did gambling affect your reputation?
- Have you ever felt remorse after gambling?
- Did you ever gamble to get money with which to pay debts or otherwise solve financial difficulties?
- Did gambling cause a decrease in your ambition or efficiency?
- After losing did you feel you must return as soon as possible and win back your losses?
- After a win did you have a strong urge to return and win more?
- Did you often gamble until all your money was gone?
- Did you ever borrow to finance your gambling?
- Have you ever sold anything to finance gambling?
- Were you reluctant to use "gambling money" for normal expenditures?
- Did gambling make you careless of the welfare of yourself or your family?
- Did you ever gamble longer than you had planned?
- Have you ever gambled to escape worry, trouble, boredom, loneliness, grief or loss?
- Have you ever committed, or considered committing, an illegal act to finance gambling?
- Did gambling cause you to have difficulty in sleeping?
- Do arguments, disappointments or frustrations create within you an urge to gamble?
- Did you ever have an urge to celebrate any good fortune by a few hours of gambling?
- Have you ever considered self-destruction or suicide as a result of your gambling?

If you answered "Yes" to any of the questions above, then it is likely that you have a gambling problem.

You may want to consider third party tools which can further help you gamble responsibly. Among such tools, the most prominent are:

betblocker.com

gamblock.com

gamban.com

Additional Support

If you're concerned about your own gambling habits or know someone who is struggling to manage theirs, there are several external support organizations available to offer guidance and assistance.

Gamblers Anonymous

Website: <https://gamblersanonymous.org>

Gambling Therapy

Website: <https://www.gamblingtherapy.org>

Contact: support@gamblingtherapy.org

GamCare

Website: <https://www.gamcare.org.uk/>

Live chat: <https://www.gamcare.org.uk/get-support/talk-to-us-now/#>

Gambleaware:

Website: <https://www.gambleaware.org>

Contact: contact@gambleaware.org

Behaviour tracking

We continuously monitor the behavior of our players to identify any gambling patterns that may indicate problematic gambling. This includes tracking unusual betting activities, excessive gambling, or behaviors consistent with gambling addiction. If any such patterns are detected, we may contact the player to offer support and encourage responsible gambling practices. The goal is to identify potential problems early and intervene before they escalate.

Player facilitated cooling-off periods and self-exclusion

All our websites support the policy of responsible gaming and offers various tools for self-control:

Cooling-off:

The Cooling-off tool allows you to suspend gaming activity for a selected period. During this time, you will not be able to:

- Deposit into your account,
- Place bets,
- Participate in promotions.

You will be able to:

- Access your account,
- Withdraw funds from your account.

You can choose one of the following periods:

- 24 hours
- 7 days
- 1 month
- 3 months

After the specified period expires, access to all platform functions will be restored automatically. You can exclude yourself from any marketing communications during the cooling-off period. You can access the cooling-off functionality [here](#).¹

Self-exclusion:

With the Self-exclusion tool, you will irrevocably lose access to the following functions for the selected period:

¹ The direct link to the tool shall be included in the respective section of the Terms & Conditions published on the project website.

- Accessing your account,
- Depositing,
- Placing bets,
- Participating in promotions.

You can choose one of the following periods:

- 1 year
- 3 years
- 5 years
- 10 years
- For life

The decision cannot be reversed, and you will need to send us a written request to reactivate your account after the expiry of the restriction period. It may take time for us to review and reactivate your account.

During Self Exclusion, you are not allowed to create a new Account, and every attempt to create a new Account during Self Exclusion is a violation of our Terms of Service and may result in the permanent ban of your original account.

Deposit limits

You can use the Deposit Limit tool to limit the total amount you can deposit over a defined period of time. Once the limit has been reached, further deposits will not be available until the end of the specified period. Decreases in the limit will take effect immediately and increases will only take place after 7 days.

You can choose one of the following periods:

- Daily

- Weekly
- Monthly

Any resolved or unresolved wager made prior to the deposit limit being set in place remains unaffected by the said limit. You can access the limit setting functionality [here](#)².

Training of employees, affiliates, marketing partners, social media influencers

All employees, affiliates, marketing partners, and social media influencers involved in promoting our services are required to undergo regular training on responsible gaming practices. This training ensures that they understand the importance of promoting safe gambling behavior and can assist in identifying warning signs of gambling problems. It also covers legal requirements, the tools available for players to control their gambling, and how to guide players to seek help if necessary. We also work with partners to ensure that their marketing efforts align with our responsible gaming principles.

General responsible gaming principles regarding marketing and advertising

Our marketing efforts are strictly aimed at individuals who are legally allowed to gamble (18+), and we do not target minors or vulnerable individuals. All advertising must be clear, honest, and not misleading, accurately representing the chances of winning and the risks involved in gambling. Promotions will include messages encouraging responsible gambling, with information about self-control tools and links to support organizations.

We ensure that our ads do not appeal to individuals at risk of gambling problems, including those struggling with mental health or financial issues. Advertising is placed only in environments appropriate for legal-age adults, and we avoid platforms frequented by minors or vulnerable groups. Affiliates and influencers promoting our services must comply with responsible gaming standards, avoiding targeting underage or at-risk audiences.

Promotional offers and bonuses are clearly explained, with all terms and conditions transparently communicated.

² The direct link to the tool shall be included in the respective section of the Terms & Conditions published on the project website.