



Sintija Zalāne <sintija.zalane@baltent.com>

BAMLA LIMITED N.V.-Tier-IV certified data center registered in Curaçao

Vegangster Legal <legal@vegangster.com>

To: Sintija Zalāne <sintija.zalane@baltent.com>

Cc: Nikita Andronicevs <n.andronicevs@vegangster.com>, Elmārs Ābelītis <elmars.abelitis@baltent.com>

Thu, Sep 18, 2025 at 4:49 PM

Dear Sintija Zalane,

Thank you for your email, and please accept our apologies for the slight delay in responding.

We fully understand the grounds of your request and the importance of the matters raised. Allow us to address your questions and provide some context based on our experience in the Curaçao gaming market.

First, we do confirm that our company holds a valid license and remains fully compliant with the applicable laws and regulations.

Historically, certain aspects of the transition process managed by the Curaçao Gaming Authority (CGA) have not always proceeded smoothly, as the regulator has at times run behind its own schedule. At this moment, several requirements apply to Curaçao operators (b2c licensees) that formally bind the companies but are not yet fully enforceable, since the regulator has not yet provided the necessary implementing details or published the required approvals. Nevertheless, we acknowledge the ongoing efforts of the CGA to restructure the regulatory framework with the goal of building a more transparent and trustworthy environment. We keep a close watch on all new changes and updates to Curaçao legislation to stay aligned with the latest requirements.

Concerning the specific issue of server requirements:

1. **For B2B licensees**, the requirements remain unclear, and no strict obligations have been set regarding the physical location of servers.
2. **For B2C licensees** (such as your company), the CGA has indeed introduced a requirement to maintain a Tier IV certified backup server in Curaçao. However, there are two important caveats:
 - While the regulation stipulates that servers must be located in CGA-approved facilities, the CGA has not yet designated or published such approved locations. This leaves the requirement in a suspended state for the time being.
 - The obligation currently applies specifically to having a **backup server** in Curaçao, rather than the entirety of operational data hosting.

At present, you may confirm that your data is hosted on our infrastructure and is managed in accordance with local legal requirements.

Of course, should the CGA publish further guidance or designate approved facilities, we will be pleased to revisit this discussion with you and ensure that all measures are taken to remain in full compliance.
We trust this provides clarity and reassurance.

Best regards,
Legal Team

On 9/15/2025 5:28 PM, Sintija Zalāne wrote:

Dear Partner,

I hope this email finds you well.

We would like to outline our current situation and concerns. We recently received a request from the Curaçao regulator (CGA) stating that the **license holder must have a Tier-IV certified data center registered in Curaçao**. This requirement must be fulfilled by the end of September.

As all of our data is hosted in your data center, and you have previously informed us that you provide all necessary compliance support, we kindly request documentation confirming the following:

- That Green Platform N.V. (Vegangster) is our official data custodian.
- That you are responsible for our data and can meet all Curaçao regulatory requirements.
- A copy of the server agreement or any relevant documentation to demonstrate this.

Additionally, as you are aware, the CGA does not engage in direct written communication with data holders for BAMLA LIMITED N.V. Therefore, **we need** to provide all supporting documentation proactively.

We are a licensed company in Curaçao and must demonstrate that **our data is registered and managed in full compliance with Curaçao law**. We hope for your kind cooperation and look forward to resolving this matter as soon as possible.

Best regards,
Sintija Zalāne
Lawyer
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