

## **KYC procedures**

Version January 23, 2023

We collect the scanned copies of the documents for the purposes of client identification. This procedure is a statutory requirement and is done in accordance with the applicable gaming regulation and anti-money laundering (AML) legal requirements.

### **The Client Identification Procedure**

The Client Identification Procedure is to be carried out:

- before any financial transaction or settlement is made – the Company does not under any circumstances permit any transaction to be made with incomplete identity and if needed residence verification information.
- when there is any doubt about the authenticity, veracity, or adequacy of the previously obtained Clients' identification data.

Clients' identification information will be collected, stored, shared and protected strictly in accordance with the Company's Personal Data Protections Regulations.

#### 1) What personal data is gathered

The first step of identity verification is to ask a person to submit the relevant data.

We collect the following:

- registration data: name, last name, telephone number,
- national passport,
- national ID card,
- driving license,
- residence permit.

#### 2) What is done to verify the information:

- The company shall make the verification with the use of a verification software through attracting the third party or, in extraordinary cases, manually,
- The international AML databases shall be used in each case of the Client check.

#### 3) if a Client submits false data or no data at all:

In this case the client shall be prohibited from receiving payouts to bank cards or the banks accounts. In this case the additional request to provide the identification documents shall be made.

#### 4) What if a Client can't be verified:

In case the Client has indicated the incorrect registration data then the client shall be prohibited from receiving payouts to bank cards or the banks accounts. In this case the additional request to provide the identification documents shall be made.

If the client has indicated a fictitious name, for example, Monica Samille Lewinsky or Barack Hussein Obama, then the Client shall be prohibited from receiving the payouts to bank cards or the banks account.

In case if the Client fails to provide the additional identification documents the Client shall be prohibited from receiving the payouts to his account until the documents are duly provided.

#### 5) Minority

The Client shall fall under suspicion in the minority, if:

- the used login shows figures indicating the year of birth, for example, brian2005@gmail.com;

- the passport was issued at the age of 15, 16 or 17;
- a client is checked through additional open sources (eg social networks) or specialized systems.

In this case the client's account shall be fully blocked before the age of the client is clearly determined by verification procedure.

#### 6) Fraud

The selfie with the ID document shall be requested in case the fraud is suspected.

#### 7) A discretion of the financial controller.

At any time if any suspicion about the authenticity of the identification data of the Client or a fraud of any kind the financial controller shall undertake the repeated or a more detailed identification of the Client. The time limited necessary for such a check is not limited.

#### 8) Payment systems.

The use of electronic wallets (top-ups and withdrawals) shall be regulated by the specific payment system. Sharing of electronic wallets is forbidden.

### **The Counterpartner Identification Procedure**

The Company shall request the following list of documents in order to identify the potential counterpart:

- 1) A Certificate of incorporation
- 2) A Charter (or Articles of association)
- 3) A confirmation of the registration address of the company (an excerpt from the Companies register, a certificate of incumbency, other similar documents)
- 4) A confirmation that the company is in good standing (an excerpt from the Companies register, a certificate of incumbency, a certificate of good standing, other similar documents)
- 5) A confirmation of the signatory's powers to sign the contract (a power of attorney, a certificate of incumbency, other similar documents)
- 6) Scan of the passport or an ID of the signatory (in the best possible quality)
- 7) Confirmation of the powers of a person who issued the power of attorney, if any (a register of directors, a certificate of incumbency, other similar documents)
- 8) The passport and the utility bill of the ultimate beneficiary of the company, the declaration of trust
- 9) The applicable license (a scan or a link to check online)

All submitted documents shall be apostilled. The scanned copies of the documents shall be sent to the email addresses of contact persons.

In case if the counterpart's verification is impossible due to the fact that the documents are made in the language unknown to the representatives of the Company, the Company shall be entitled to request the documents with a notarized translation into English attached.

The abovementioned list of documents is not exhaustive. The Company shall have a right to request the counterpart to provide additional documents.

### **Record of KYC processes**

The Company keeps the KYC records for 5 years under the applicable legal requirements.