



TECH

CARE

AML

COMBINED QUARTERLY REPORT (**CQR**) FOR  
COMBINED REPORTING OFFICERS (**CRO**):  
DATA PROTECTION REPORTING (**DPR**)  
RESPONSIBLE GAMING REPORTING (**RGR**)  
MONEY LAUNDERING REPORTING (**MLR**)  
FOR TEMPLATE β v.3393.58.A | Ai-1-DT7PXJ3H  
IGAMINGDATABASE.COM

## DISCLAIMER

The model (the: "**Model**") Combined Quarterly Report ("**CQR**") is designed for IP-Operators of games of chance that function under the legal framework of IP Template v.3393.58 (the: "**Template**"). It has been tailored to use for a single key individual ("**Key Individual**") that as Combined Reporting Officer ("**CRO**") is combining the capacity of the Data Protection Reporting Officer ("**DPRO**"), as meant in article A.6.1. of the Template, the Responsible Gaming Reporting Officer ("**RGRO**") as meant in article B.5.1. of the Template and the Money Laundering Reporting Officer ("**MLRO**"), as meant in article C.8.1. of the Template. The Model cannot be used by officers that do not exercise the said capacities in a combined fashion. Free to use without charge, use of the Model, however, is at the personal responsibility of the user. All rights, include trademarks and logos have been reserved by igamingdatabase.com. The layout of the document may not be altered in any way. Preparation and filing of any documentation should at all times be left to a professional, fit and proper to perform this task. A copy of the CQR should be properly and timely filed with the aggregator (the: "**Aggregator**", commonly known as the "**Master License Holder**") as well as the appropriate oversight authority, within one calendar month after the calendar quarter has ended.

## (1) IP-OPERATOR, WEBSITE, CRO, AGGREGATOR & REPORTING PERIOD

(1.1.) NAME OF THE IP-OPERATOR

(1.2.) REGISTER EXCERPT NR.

(1.3.) GRANT NR.

&gt;[ ]&lt; &gt;[ ]&lt; &gt;[ ]&lt;

(1.4.) PRIMARY WEBSITE &gt;[ ]&lt;

&gt;[ ]&lt; (1.5.) IS THE WEBSITE ACTIVE? YES &gt;[ ] NO &gt;[ ]&lt;

(1.6.) NAME OF THE (APPROVING) CRO

(1.7.) DATE OF BIRTH

(1.8.) ID/PASSPORT NR.

&gt;[ ]&lt; &gt;[ ]&lt; &gt;[ ]&lt;

IS THE CRO A NATURAL INDIVIDUAL, A CURAÇAO RESIDENT AND FURTHERMORE UNDER REGULATORY SUPERVISION OF THE CENTRAL BANK OF CURAÇAO AND SINT MAARTEN AS PER THE CURAÇAO ORDINANCE PB 2003, NO. 113?

(1.9.) YES &gt;[ ] NO &gt;[ ]&lt; WHO IS THE LICENSING AGGREGATOR? (1.10.) &gt;[ ]&lt;

IF (1.9.) HAS BEEN ANSWERED <NO>, IS CRO A NATURAL INDIVIDUAL, A CURAÇAO RESIDENT AND FURTHERMORE HAS PROOF BEEN PROVIDED THAT THE CRO HAS THE NECESSARY PROFESSIONAL KNOWLEDGE TO PROPERLY PERFORM DUTIES AS NON-EXECUTIVE DIRECTOR, WHICH DUTIES INCLUDE: (I) ACCOUNTING AND TAXATION; (II) ANY LOCAL REQUIREMENTS; (III) REVIEW OF AGREEMENTS PERTAINING B2B SERVICES ("**B2B AGREEMENTS**")?

(1.11.) YES &gt;[ ]&lt; NO &gt;[ ]&lt;

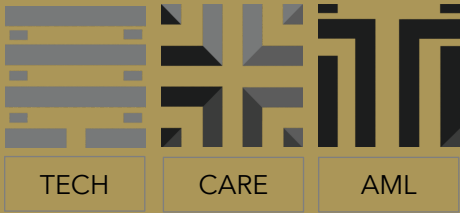
WHO HAS **PREPARED** THE CQR? (1.12.) NAME >[ ]<

(1.13.) CAPACITY: EXECUTIVE DIRECTOR &gt;[ ] CRO &gt;[ ] OTHER &gt;[ ], NAMELY: &gt;[ ]&lt;

IF (1.13.) HAS **NOT** BEEN ANSWERED <EXECUTIVE DIRECTOR>, IS THE PERSON UNDER (1.12) WITHIN THE CIRCLE OF THE PRIMARY PRINCIPAL, HAVING DIRECT ACCESS TO THE INFORMATION NECESSARY TO PREPARE THE CQR?

(1.14.) DOES NOT APPLY &gt;[ ] YES &gt;[ ] NO &gt;[ ]&lt;

(1.15.) THE CQR IS FILED FOR QUARTER: Q1 &gt;[ ] Q2 &gt;[ ] Q3 &gt;[ ] Q4 &gt;[ ] AND YEAR [ ]



## (2) CONTENTS, CERTIFICATION & SIGNING

PLEASE LIST THE NUMBER OF ENCLOSURES AND PAGES WITH EACH SUB-REPORT

	QUARTER	NUMBER OF ENCLOSURES	NUMBER OF ADDED PAGES
DATA PROTECTION REPORT	>[ ]<	>[ ]<	>[ ]<
RESPONSIBLE GAMING REPORT	>[ ]<	>[ ]<	>[ ]<
MONEY LAUNDERING REPORT	>[ ]<	>[ ]<	>[ ]<
TOTAL		>[ ]<	>[ ]<

PLEASE DESCRIBE THE ENCLOSURES WITH THE DATA PROTECTION REPORT BELOW

PLEASE DESCRIBE THE ENCLOSURES WITH THE RESPONSIBLE GAMING REPORT BELOW

PLEASE DESCRIBE THE ENCLOSURES WITH THE RESPONSIBLE GAMING REPORT BELOW

THE CRO CERTIFIES THE FOLLOWING:

I HAVE VERIFIED THAT THE PERSON (1.12) THAT HAS PREPARED THE CQR  
APPEARS TO BE FIT AND PROPER TO DO SO

YES >[ ]< NO >[ ]<

THIS PERSON HAS BEEN FORTHCOMING IN PROVIDING THE REQUIRED  
INFORMATION AND THERE HAVE BEEN NO EXTRAORDINARY PROBLEMS  
OR DELAYS, DISCUSSING THE CONTENT WITH THIS PERSON.

YES >[ ]< NO >[ ]<

I HAVE PERSONALLY HELD A VIDEO CONFERENCE WITH THIS PERSON IN  
WHICH THE CONTENTS OF THE FINAL DRAFT HAVE BEEN DISCUSSED.  
DURING THIS CONFERENCE I WAS ABLE TO POSITIVELY ESTABLISH THE  
IDENTITY OF THIS PERSON

YES >[ ]< NO >[ ]<

I HAVE PERSONALLY HELD A VIDEO CONFERENCE WITH THIS PERSON IN  
WHICH THE CONTENTS OF THE FINAL DRAFT HAVE BEEN DISCUSSED.  
DURING THIS CONFERENCE I WAS ABLE TO POSITIVELY ESTABLISH THE  
IDENTITY OF THIS PERSON

YES >[ ]< NO >[ ]<

I AM A NATURAL INDIVIDUAL, A CURAÇAO RESIDENT AND FURTHERMORE  
UNDER REGULATORY SUPERVISION OF THE CENTRAL BANK OF CURAÇAO  
AND SINT MAARTEN AS PER THE CURAÇAO ORDINANCE PB 2003, NO. 113

YES >[ ]< NO >[ ]<

[SIGNATURE ON THE NEXT PAGE]



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## (2) CONTENTS, CERTIFICATION & SIGNING - CONTINUATION PAGE 2

WITH PROOF OF SIGNATURE, THE ORIGINAL CQR WILL BE KEPT IN THE PERMANENT COMPLIANCE FILE. A COPY OF THE CQR WILL BE SENT TO THE FOLLOWING ENTITIES:

NAME OF THE AGGREGATOR	(1.10.)	>[	]	<
NAME OF THE AML AUTHORITY		>[	]	<
NAME OF THE CARE AUTHORITY		>[	]	<
NAME OF THE TECH AUTHORITY		>[	]	<

I, THE CRO OF (1.1.) >[ ]<,

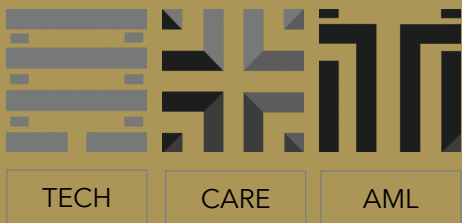
HEREBY CERTIFY THE CQR OF QUARTER >[ ]<, YEAR >[ ]<

(1.6.) NAME OF THE (APPROVING) CRO	(1.7.) DATE OF BIRTH	(1.8.) ID/PASSPORT NR.
>[ ]<	>[ ]<	>[ ]<

SIGNATURE AND STAMP OR SEAL	DATE	PLACE
>[ ]<	>[ / / ]<	>[ ]<

! DO NOT FORGET TO INITIAL EVERY PAGE AND EVERY ENCLOSURE

FREE SPACE FOR ADDITIONAL NOTES ON PREPARATION PROCESS



**TECH (A) - DATA PROTECTION REPORTING (DPR)**

**NUMBER OF ENCLOSURES:** [ ]

(A.1.) DURING THIS QUARTER, HAS THE IP-OPERATOR COMPLIED IN FULL, WITHOUT ANY INCIDENTS, WITH THE PRIVACY REGULATIONS THAT APPLY TO ITS END USERS, SUCH AS, HOWEVER NOT LIMITED TO EU DIRECTIVE EU 2016/679 OR: GENERAL DATA PROTECTION REGULATION ("GDPR")? YES >[ ] < NO >[ ] <

(A.2.) IF (A.1.) HAS BEEN ANSWERED WITH <NO>, NOTE HOW MANY BREACHES OF COMPLIANCE HAVE TAKEN PLACE AND DESCRIBE THOSE BREACHES OF COMPLIANCE BELOW:

HAVE THERE BEEN ANY CHANGES THIS YEAR IN THE USE BY THE IP-OPERATOR OF HARDWARE OR SOFTWARE, SUCH AS HOWEVER NOT LIMITED TO THE ONBOARDING, USE OR PURCHASE OF NEW GAMING SOFTWARE?

(A.3.) YES >[ ] < NO >[ ] <

(A.4.) IF (A.3.) HAS BEEN ANSWERED WITH <YES>, PLEASE DESCRIBE CHANGES BELOW (ADD AN ENCLOSURE):

DID THE HARDWARE AND SOFTWARE OF THE OPERATOR UNDERGO RELIABILITY CERTIFICATION, NOT LONGER THAN ONE YEAR AGO?

(A.5.) YES >[ ], BY CERTIFIER: >[ ] < NO >[ ] <

ARE THERE PROPER AND UP-TO-DATE DISASTER RECOVERY PROCEDURES IN PLACE? (A.6.) YES >[ ] NO >[ ] <

THIS QUARTER, HAVE THERE BEEN, ARE THERE ANY (IMMINENT) PENDING DISPUTES BETWEEN THE IP-OPERATOR AND THIRD PARTIES, SUCH AS HOWEVER NOT LIMITED TO DISPUTES OF THE USE OF SOFTWARE, TRADEMARK INFRINGEMENTS, GEO- BLOCKING OR TERRITORIAL INFRINGEMENTS?

(A.7.) YES >[ ] < NO >[ ] < IF (A.7.) IS <YES>, PLEASE DESCRIBE DISPUTES BELOW (ADD AN ENCLOSURE):

(A.8)

(A.9.) SELECT ALL OF THE CATEGORIES THAT ARE DISPLAYED TO THE PUBLIC ON EVERY WEBSITE OF THE IP-OPERATOR:

- |                               |  |
|-------------------------------|--|
| (1) TERMS OF SERVICE >[ ] <   | (5) AML >[ ] <   |
| (2) RESPONSIBLE GAMING >[ ] < | (6) FAIRNESS & RNG TESTING METHODS >[ ] <                      |
| (3) SELF-EXCLUSION >[ ] <     | (7) KYC POLICIES, PRIVACY & MANAGEMENT OF PERSONAL DATA >[ ] < |
| (4) DISPUTE RESOLUTION >[ ] < | (8) ACCOUNT, PAYOUTS AND BONUSES >[ ] <                        |

TOTAL NUMBER OF ACTIVE ALIASES (A.10.) >[ ] < TOTAL NUMBER OF ACTIVATED ALIASES THIS QUARTER? (A.11.) >[ ] <

DOES THE OPERATOR ALLOW THE USE OF CRYPTO CURRENCIES? (A.12.) YES >[ ] < NO >[ ] <

IF (A.13.) IS <YES>, PLEASE DESCRIBE HOW THE IP-OPERATOR PROPERLY VERIFIES USER KYC (ADD AN ENCLOSURE):

(A.14) REMARKS



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## CARE (B) - RESPONSIBLE GAMING REPORTING (RGR)

NUMBER OF ENCLOSURES: [ ]

! ALSO TO BE COMPLETED BY NON-ACTIVE IP-OPERATORS

LIST THE NUMBER OF KEY INDIVIDUALS THAT ARE RECENTLY (RE-CERTIFIED), NOT LATER THAN ONE YEAR, IN HANDLING MATTERS OF RESPONSIBLE GAMING, SUCH AS RECOGNITION OF PROBLEMATIC END-USER BEHAVIOR

(B.1.) >[ ]<

DOES THE COMPANY HAVE AN UP-TO-DATE MANUAL ON THE IMPLEMENTATION OF PROCEDURES OF RESPONSIBLE GAMING, AIMED AT SAFEGUARDING END-USERS?

(B.2.) YES >[ ]< NO >[ ]<

HAVE THERE BEEN ANY POLICY CHANGES IN MATTERS OF RESPONSIBLE GAMING? (B.3.) NO >[ ]< YES >[ ]<, NAMELY:

DOES THE OPERATOR HAVE TERMS OF SERVICE IN PLACE?

(B.4.) NO >[ ]< YES >[ ]< PLEASE INCLUDE A COPY OF THE TERMS OF SERVICE

IF (B.4.) HAS BEEN ANSWERED WITH <YES>, PLEASE ANSWER THE FOLLOWING ADDITIONAL QUESTIONS:

ON WHAT DATE WAS THE MOST RECENT CHANGE IN THE TERMS OF SERVICE IMPLEMENTED? (B.5.) >[ ] / [ ] / [ ]<

LIST THE NUMBER OF TIMES THAT THE TERMS OF SERVICE HAVE BEEN AMENDED IN THE LAST 4 QUARTERS (B.6.) >[ ]<

HOW MANY DISPUTES HAVE BEEN REGISTERED THIS QUARTER BETWEEN END USERS AND THE OPERATOR, INCLUDING HOWEVER NOT LIMITED TO THE NUMBER OF COMPLAINTS THAT WERE FILED?

(B.7.) >[ ]< WHAT PERCENTAGE OF THESE DISPUTES WERE AMICABLY RESOLVED IN THIS QUARTER? (B.8.) >[ ]<

WHAT WAS THE AVERAGE TIME (IN DAYS) THAT PASSED BEFORE AN END-USER DISPUTE WAS RESOLVED? (B.9.) >[ ]<

HOW MANY END-USER DISPUTES WERE REFERRED TO VOLUNTARY MEDIATION OR BINDING ARBITRATION? (B.10.) >[ ]<

HOW MANY END-USER DISPUTES ARE PENDING LITIGATION? (B.11.) >[ ]<

HOW MANY END-USERS REQUESTED SELF-EXCLUSION? (B.12.) >[ ]< NR. OF REQUESTS EXECUTED: (B.13.) >[ ]<

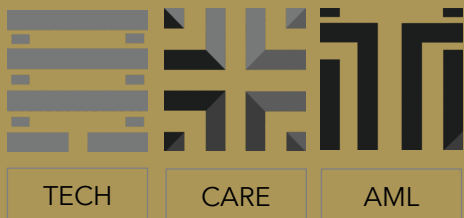
NUMBER OF NON-VOLUNTARY EXCLUSIONS (NON-FRAUD) (B.14.) >[ ]< (FRAUD-RELATED) (B.15.) >[ ]<

HOW MANY END-USERS WERE REFERRED TO THIRD PARTIES FOR ASSISTANCE IN PROBLEMATIC BEHAVIOR? (B.16.) >[ ]<

WHICH PROFESSIONAL THIRD PARTIES WHO OFFER HELP WITH ADDICTION HAVE BEEN INCLUDED ON THE WEBSITES?

(B.17.) >[ ]<

(B.18) DESCRIBE ANY ADDITIONAL INCIDENTS OR REMARKS



## AML (C) - MONEY LAUNDERING REPORTING (MLR)

NUMBER OF ENCLOSURES: [    ]

LIST THE NUMBER OF ULTIMATE BENEFICIAL OWNERS (NATURAL INDIVIDUALS, "**UBO'S**") (C.1.) >[    ]<

HAS THE IP-OPERATOR CHANGED ULTIMATE BENEFICIAL OWNERS WITHIN THE PERIOD OF ONE YEAR PRIOR TO THIS QUARTER?

(C.2.) YES >[    ]< NO >[    ]<

IF (C.2.) HAS BEEN ANSWERED WITH <YES>, PLEASE ANSWER THE FOLLOWING ADDITIONAL QUESTION UNDER (C.3)

HOW MANY TIMES HAS THE IP-OPERATOR CHANGED ONE OR MORE UBO'S WITHIN THE PERIOD OF ONE YEAR PRIOR TO THIS QUARTER? INCLUDE ALL PURCHASE DATES AS WELL AS PURCHASE PRICES (ATTACH ENCLOSURE IF REQUIRED).

(C.3.) >[    ]<

DOES THE COMPANY HAVE AN UP-TO-DATE MANUAL OF AML-PROCEDURES (C.4.) YES >[    ]< NO >[    ]<

HAVE THERE BEEN ANY POLICY CHANGES IN THIS QUARTER IN AML POLICIES? (C.5.) YES >[    ]< NO >[    ]<

IF (C.5.) HAS BEEN ANSWERED WITH <YES>, PLEASE ENCLOSE A COPY OF THE MOST RECENT AML-MANUAL.

HAS THE IP-OPERATOR BEEN ASKED THIS QUARTER TO ENTER INTO ANY AGREEMENTS WITH THIRD PARTIES THAT ARE AFFILIATED TO THE IP-OPERATOR?

(C.6.) YES >[    ]< NO >[    ]<

IF (C.6.) IS <YES>, PLEASE LIST ALL AGREEMENTS AND PARTIES INVOLVED IN THOSE AGREEMENTS (USE ENCLOSURE)

HAS THE IP-OPERATOR RECEIVED ANY INVOICES OR RENDERED ANY PAYMENTS TO CURAÇAO NON-RESIDENTS FOR WHICH NO LEGAL BASIS (AGREEMENT OR ANY OTHER COMMITMENT IN WRITING) IS ON FILE?

(C.7.) YES >[    ]< NO >[    ]<

IF (C.7.) HAS BEEN ANSWERED WITH <YES>, PLEASE LIST ALL INVOICES, PAYMENTS AND THIRD PARTIES .

HAS THE COMPANY BEEN APPROACHED BY THIRD PARTIES WHO HAVE TRIED TO OBTAIN, TRADE OFF OR OTHERWISE USE END-USER ASSETS (DEPOSITS, OWED WINNINGS, ACCOUNTS) THAT DO NOT ORIGINALLY BELONG TO THEM?

(C.8.) YES >[    ]< NO >[    ]<

IF (C.8.) HAS BEEN ANSWERED WITH <YES>, PLEASE DESCRIBE ALL OF THESE ENCOUNTERS BELOW.

HAVE THERE BEEN ANY UNUSUAL TRANSACTIONS, INCLUDING THOSE APPEARING TO BE NOT AT ARMS-LENGTH BASIS?

(C.9.) YES >[    ]< NO >[    ]<

IF (C.9.) HAS BEEN ANSWERED WITH <YES>, PLEASE DESCRIBE ALL UNUSUAL TRANSACTIONS BELOW.



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## AML (C) - MONEY LAUNDERING REPORTING (MLR) / CONTINUATION PAGE 2

PLEASE COMPLETE KEY QUARTER FIGURES BELOW:

BIGGEST SINGLE WINNING (C.10.)	>[ €	] < TURNOVER (C.15.)	>[ €	] <
BIGGEST SINGLE LOSS (C.11.)	>[ €	] < LARGEST EXPENSE (C.16.)	>[ €	] <
BIGGEST SINGLE DEPOSIT (C.12.)	>[ €	] < INT. DIVIDEND DISTRIBUTIONS (C.17.)	>[ €	] <
BIGGEST SINGLE WITHDRAWAL (C.13.)	>[ €	] < TOTAL LICENSE PAYMENTS (C.18.)	>[ €	] <
TOTAL OUTSTANDING LOANS (C.14.)	>[ €	] < PAID TO AFFILIATED PARTIES (C.19.)	>[ €	] <

HAVE THERE BEEN ANY DOCUMENTS THAT DID NOT APPEAR GENUINE?

(C.20.) YES >[ ] < NO >[ ] <

IF (C.20.) HAS BEEN ANSWERED WITH <YES>, PLEASE DESCRIBE ALL OF THESE EVENTS BELOW.

(C.21.)

HAS ANYONE APPLIED PRESSURE NOT TO PROVIDE INFORMATION FOR THE PURPOSE OF THIS REPORT, DELAYED OR REFUSED TO PROVIDE INFORMATION, ARRANGED OR THREATENED TO ARRANGE A CHANGE IN MANAGEMENT OR OTHERWISE ATTEMPTED TO PREVENT COMPILATION OF THIS REPORT?

(C.22.) YES >[ ] < NO >[ ] <

IF (C.22.) HAS BEEN ANSWERED WITH <YES>, PLEASE DESCRIBE ALL OF THESE EVENTS BELOW AND THE PERSONS INVOLVED.

(C.23.)

HAVE THERE BEEN ANY OFFICIAL INFORMATION REQUESTS BY THE AUTHORITIES, SUCH AS LAW ENFORCEMENT, PERTAINING MATTERS OF AML?

(C.24.) YES >[ ] < NO >[ ] <

IF (C.24.) HAS BEEN ANSWERED WITH <YES>, PLEASE DESCRIBE ALL OF THESE EVENTS BELOW.

(C.25) DESCRIBE ANY ADDITIONAL INCIDENTS OR REMARKS