

CONFIDENTIAL

INFORMATION SECURITY POLICY

PlayDOM B.V., a Company with registered address at
Kaya Richard J. Beaujon Z/N Landhuis Joonchi II Curacao,
registration number 145097, domain name: pkrdm.best
(hereinafter referred to as “**Company**”)



**Gouloud Mercedes
Hammoud** obo Global
Related Services B.V., the
Statutory Director

CONTENTS

1.	GENERAL PROVISIONS AND POLICY STATEMENT	4
2.	DEFINITIONS AND ABBREVIATIONS	4
3.	PRINCIPLES OF PERSONAL DATA COLLECTING.....	5
4.	PERSONALLY IDENTIFIABLE INFORMATION	5
5.	HOW AND WHY THE COMPANY USES PERSONAL INFORMATION OF PLAYERS.....	6
6.	TRAFFIC ANALYSIS AND NON-PERSONALLY IDENTIFIABLE INFORMATION	7
7.	SHARING THE PLAYER'S PERSONAL INFORMATION.....	7
8.	PERSONAL DATA STORAGE TERMS.....	8
9.	SECURITY	8
10.	MARKETING	9
11.	COOKIES.....	9
12.	DISCLAIMER.....	10
13.	CONTACT INFORMATION	10
14.	POLICY HISTORY	10

KEY INFORMATION

Approving Official(s):	Gouloud Mercedes Hammoud obo Global Related Services B.V., the Statutory Director
Responsible Office:	Gouloud Mercedes Hammoud obo Global Related Services B.V., the Statutory Director
Effective Date:	28.05.2025
Next Review Date:	28.05.2026

1. GENERAL PROVISIONS AND POLICY STATEMENT

1.1. PlayDOM B.V. is fully committed to upholding the privacy and data protection rights of its Players. The Company adopts a transparent, ethical, and responsible approach to the collection, use, and handling of personal data, ensuring that Players are clearly informed of how their information is processed and for what specific purposes.

1.2. This Information Security Policy (the “Policy”) establishes the guiding principles for the secure management, processing, and protection of personal data across all of the Company’s operations. It also defines the rights of Players concerning their personal information, as well as the mechanisms through which those rights may be exercised.

1.3. Any individual who disagrees with the provisions of this Policy should immediately discontinue the use of the Company’s services. By registering an account, submitting personal information, engaging in wagering activities, or conducting financial transactions through the platform, the Player expressly agrees to be bound by this Policy and the accompanying Terms of Service.

1.4. While Players retain the right to deactivate or cease use of their accounts at any time, the Company may be under legal or regulatory obligation to retain certain categories of personal data beyond the termination of the Player’s account. This retention is necessary for compliance, recordkeeping, dispute resolution, and fraud prevention purposes.

1.5. The Company reserves the right to update or amend this Policy periodically to reflect changes in applicable laws, regulatory guidance, technological developments, or internal practices. All material revisions will be published on the Company’s website, and Players are encouraged to review the Policy regularly to remain informed of their data protection rights and obligations.

2. DEFINITIONS AND ABBREVIATIONS

2.1. Company – refers to PlayDOM B.V., a legally registered entity under the laws of Curaçao (registration no. 145097), located at Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Curaçao.

2.2. GCB – Gaming Control Board of Curacao.

2.3. GDPR – General Data Protection Regulation.

2.4. CGA – Curacao Gaming Authority.

2.5. NAF – Netherlands Antillean guilder, the currency of Curaçao.

2.6. Gambling or Gambling Game — refers to any online game made available on the Website in which a Player competes for a Prize. This includes: (i) games that incorporate both elements of chance and skill; (ii) games where chance can be overcome through exceptional skill; and (iii) games that are presented as involving an element of chance, regardless of whether they actually do—excluding sports.

2.7. Customer —refers to any individual who accesses or navigates the Website, reviews its terms, this Policy, and related documents, and expresses the intention to register on the Website in order to engage in Gambling and obtain Player status.

2.8. Third Parties — any individuals and/or legal entities other than the User and/or the Player, in particular, but not exclusively: family members, spouses, friends, partners, counterparties, creditors, service providers, agents, etc.

2.9. **Website** — the official websites of the Company, on which Customer may play the Gambling Games.

2.10. In this Policy singular include the plural, and the plural include singular in cases of a need for interpretation.

3. PRINCIPLES OF PERSONAL DATA COLLECTING

PlayDOM B.V. adheres to internationally recognized data protection standards and ensures that all personal data is collected, processed, and managed in accordance with the core principles of lawful and ethical data handling. These principles form the foundation of the Company's data governance framework and guide all internal policies and operational practices:

- **Lawfulness, Fairness, and Transparency:** Personal data is processed only where there is a valid legal basis, and always in a fair and transparent manner. The Company provides Players with clear, accessible information on the nature, purpose, and scope of data processing, enabling informed decision-making.
- **Purpose Limitation:** Data is collected for clearly defined, explicit, and legitimate purposes. It is not subsequently processed in ways that are incompatible with those initial purposes, thereby minimizing the risk of misuse or unauthorized repurposing.
- **Accuracy:** The Company takes all reasonable steps to ensure that personal data is accurate, complete, and kept current. Players are provided with mechanisms to review and correct their data, and any inaccuracies are rectified without undue delay.
- **Storage Limitation:** Personal data is retained only for as long as necessary to fulfill the purpose for which it was collected, unless a longer retention period is justified by legal, regulatory, or contractual requirements. Data that is no longer required is securely deleted or anonymized.
- **Integrity and Confidentiality:** The Company implements and continuously improves a comprehensive set of technical and organizational security measures to safeguard personal data. This includes protection against unauthorized access, unlawful processing, accidental loss, destruction, or damage, ensuring that data confidentiality, integrity, and availability are preserved at all times.

These principles are embedded into all aspects of the Company's operations, from system design to employee conduct, ensuring a strong culture of privacy and data protection across the organization.

4. PERSONALLY IDENTIFIABLE INFORMATION

4.1. To fully access and benefit from the services provided on the Company's Website, Players are required to submit certain personally identifiable information (PII). This data is fundamental to ensuring account functionality, transactional security, regulatory compliance, and a customized user experience.

4.2. The Company may collect personal data under the following circumstances:

- During the registration and creation of a Player account on the Website;
- When interacting with the Website and its features (e.g., gameplay, financial transactions);
- When voluntarily submitting information in publicly accessible areas of the platform (e.g., forums, reviews);

- When communicating with the Company's Customer Support team through official support channels.

4.3. The personal data collected may include, but is not limited to:

- Username and display name;
- First name and surname;
- Date of birth;
- Email address;
- Residential or mailing address;
- Contact number (mobile or landline);
- Billing or payment address;
- Government-issued identification documents (e.g., passport, ID card);
- Proof of address documentation (e.g., utility bills, bank statements);
- Player transaction records and account activity history;
- Preferences regarding website features and usage behavior;
- Any additional personal data voluntarily submitted by the Player;
- Financial and payment details, including credit/debit card numbers and alternative payment method credentials.

4.4. Players are solely responsible for the accuracy and completeness of the personal information they provide. The Company disclaims any liability arising from damages, service limitations, or compliance issues resulting from inaccurate, outdated, or falsified data.

4.5. Certain personal information is mandatorily collected to verify the Player's legal eligibility to engage in gambling activities (e.g., age verification) and to fulfill legal and financial compliance obligations, including Know Your Customer (KYC) and Anti-Money Laundering (AML) requirements, as overseen by the Gaming Control Board (GCB).

4.6. Players may at any time request corrections or updates to their personal data by contacting the Company's Customer Support through authorized communication channels. The Company will act on such requests without undue delay, subject to identity verification.

4.7. All personal data collected is used exclusively for internal business and operational purposes. Disclosure to third parties shall occur only under clearly defined conditions as stated in this Policy and is limited to entities contractually bound to uphold equivalent levels of data protection. Any such disclosure is conducted in accordance with applicable privacy legislation and subject to oversight by the GCB.

5. HOW AND WHY THE COMPANY USES PERSONAL INFORMATION OF PLAYERS

5.1. The Company processes Players' personal data only for specific, legitimate business purposes necessary to operate its services effectively and securely. These purposes include:

- **Service Delivery and Account Management:** To provide access to the Company's services, manage Player accounts, process deposits and withdrawals, and fulfill obligations under the Terms of Service.
- **Legal and Regulatory Compliance:** To comply with applicable laws and regulations, including those related to anti-money laundering (AML), responsible gaming, fraud prevention, and identity verification.

- **Platform Maintenance and Improvement:** To monitor the Website's performance, fix technical issues, and improve features to ensure a better user experience.
- **Marketing (With Consent):** To inform Players about new promotions, features, and offers—only if the Player has chosen to receive such communications.

5.2. The Company processes only the data needed for these purposes and does not use personal information in ways that are unrelated or unnecessary.

6. TRAFFIC ANALYSIS AND NON-PERSONALLY IDENTIFIABLE INFORMATION

6.1. To help improve the quality, reliability, and user-friendliness of the Website, the Company collects and reviews technical and behavioral information that does not directly identify Players. This helps ensure the platform operates smoothly and meets user expectations.

6.2. The types of data collected may include device type, operating system, browser version, language settings, IP address, time and date of access, visited pages, browsing paths, session length, loading times, and crash reports.

6.3. This information is automatically collected through tools like cookies, log files, and other standard tracking technologies. It is securely stored and used only for purposes such as traffic analysis, system troubleshooting, and improving website features.

6.4. All such data is anonymized and reviewed in aggregate form. It is never linked with personal information in a way that could identify individual Players. The Company only collects the data necessary to meet its technical and service goals.

6.5. The Company may also use analytics services from trusted third-party providers. These tools help analyze how users interact with the Website, measure the effectiveness of certain features, and improve performance. Data shared with these providers is anonymized and used only for these specific purposes.

6.6. The Company routinely checks and updates how tracking technologies are used to make sure they meet privacy standards. Players are also given options to manage or limit tracking through their browser settings or cookie preferences.

7. SHARING THE PLAYER'S PERSONAL INFORMATION

7.1. The Company treats Player data with strict confidentiality, but in some cases, it may need to share this information with third parties. Data sharing only takes place when necessary, justified, and allowed by law. Examples include:

- **Legal and Regulatory Requirements:** When the Company is legally required to provide data to authorities or respond to court orders or regulatory inquiries.
- **Enforcing Agreements:** To enforce the Company's Terms of Service, Privacy Policy, or resolve disputes.
- **Use of Service Providers:** When working with trusted third-party partners—such as payment processors, identity verification services, cloud hosting, or compliance tools—who help the Company operate its services securely. These providers are required to protect Player data.

- **Fraud and Risk Management:** To detect and prevent fraud, suspicious behavior, and unlawful activity, including money laundering.
- **Responsible Gambling Support:** When cooperating with organizations that research or promote responsible gambling behavior and player protection.
- **Protecting the Company and Users:** To protect the rights, property, and safety of the Company, its Players, employees, or the public.
- **With Consent or Legal Basis:** When the Player has given permission, or when data sharing is allowed under the law.

7.2. Players agree that their personal data may be processed and stored in countries outside of their own. This includes locations where the Company, its partners, or service providers operate.

7.3. When data is transferred across borders, the Company uses safeguards such as contracts and agreements to make sure personal data remains protected and handled appropriately.

7.4. The Company regularly reviews its data sharing practices and checks that all partners handling data comply with its privacy standards and policies.

8. PERSONAL DATA STORAGE TERMS

8.1. The Company keeps personal data for as long as a Player maintains an active account and uses the Company's services. This allows the Company to provide support, process transactions, and manage the Player's experience on the platform.

8.2. When an account is closed—either by the Player or the Company—personal data is securely stored for up to five (5) years. This retention period helps the Company to:

- Resolve any future disputes or complaints;
- Comply with legal and financial reporting requirements, including anti-money laundering (AML) rules;
- Meet contractual or statutory record-keeping obligations;
- Provide information if requested during a regulatory audit or inspection.

8.3. After the five-year period, if the data is no longer needed for legal, regulatory, or operational reasons, it will be permanently deleted or destroyed using secure methods.

8.4. The Company restricts access to stored personal data, allowing only authorized employees to view it when necessary. It also performs regular checks to identify and safely dispose of outdated or unnecessary data.

8.5. In some cases, the Company may keep anonymized or aggregated data beyond the standard retention period for statistical or analytical purposes. This type of data cannot be used to identify any individual.

9. SECURITY

9.1. The Company is committed to protecting the confidentiality, integrity, and availability of Players' personal data. To do this, strong technical and organizational security measures are in place to prevent unauthorized access, changes, leaks, or loss of data.

9.2. All personal data is stored in secure systems and databases. These are protected by encryption protocols such as SSL/TLS 1.2 or higher. Access to sensitive data is restricted using secure login methods, role-based permissions, and monitoring tools.

9.3. The Company regularly performs risk assessments, security scans, and tests to detect and fix any weaknesses. Backups are carried out routinely, and disaster recovery procedures are ready in case of system failure.

9.4. Any third-party providers or partners who handle personal data on behalf of the Company must follow the same high security standards. They are carefully reviewed and must agree to strict contractual obligations to ensure data safety.

9.5. All employees who handle personal data receive ongoing training on data protection, cybersecurity best practices, and how to respond to security incidents.

9.6. If a data breach is suspected or confirmed, the Company will activate its incident response plan. Affected Players will be notified quickly, and any required reports will be made to relevant authorities in line with applicable laws.

10. MARKETING

10.1. The Company follows a consent-based approach for all marketing. Promotional emails, service updates, and special offers are only sent to Players who have clearly agreed to receive them—either during account registration or through their account settings.

10.2. The Company does not sell or share Players' personal information with third parties for their own advertising purposes. Any marketing sent by third parties is done on the Company's behalf and under its direct supervision.

10.3. Players can manage their marketing preferences at any time. They can change or withdraw their consent by adjusting their settings or contacting Customer Support. Opt-out requests are handled promptly.

10.4. Every marketing message includes an easy-to-use unsubscribe option so Players can stop receiving these communications immediately if they choose.

10.5. The Company regularly reviews its marketing practices to ensure they remain respectful, privacy-focused, and in line with ethical standards. Any targeted marketing is limited, carefully reviewed, and only carried out when the Player has given permission.

11. COOKIES

11.1. The Company uses cookies to improve the Player's experience on the Website. Cookies help personalize content, remember preferences, and ensure that the platform works properly.

11.2. Cookies are small text files that are stored on a Player's device (computer, tablet, or smartphone) when they visit the Website. These files help the system recognize returning users and maintain session continuity.

11.3. The Website uses both **first-party cookies**, which are set by the Company, and **third-party cookies**, which are set by external services. Third-party cookies are mainly used to help the Company analyze website traffic and understand the effectiveness of advertisements and promotions.

11.4. The types of cookies used include:

- **Required Cookies:** These are essential for the Website to work properly. They enable core features such as secure login, account access, and navigation between pages. Without them, the Website cannot function.
- **Functional Cookies:** These help remember user choices, such as language selection and game preferences, to improve usability and provide a more personalized experience.
- **Advertising Cookies:** These are used to evaluate how effective marketing efforts are, track ad delivery, and sometimes to show personalized ads based on a Player’s behavior across websites.

12. DISCLAIMER

12.1. The Company provides its services on an “as-is” and “as-available” basis. While efforts are made to maintain reliable service, no guarantees are made regarding uninterrupted or error-free operation.

12.2. The Company is not responsible for issues or delays caused by events beyond its control, including technical failures, third-party system outages, or unforeseen disruptions.

12.3. The Company is not liable for any indirect, incidental, or consequential damages that may result from the use, misuse, or disclosure of personal data, as described in this Policy.

13. CONTACT INFORMATION

13.1. For any questions regarding this policy, please contact: support@pkrdm.best or send a mail on the address: Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Willemstad, P.O. Box 6248, Curacao.

14. Policy History

May 28, 2025	Policy update (Annual update)
December 01, 2024	Policy update (legal changes)
June 12, 2024	Policy update (legal changes)
May 28, 2023	Policy update (Annual update)
May 12, 2022	Policy update (Annual update)
May 20, 20213	Policy update (Annual update)
May 24, 2020	Initial Policy