LuckyMary.com

AML & KYC Policy

Know Your Player (KYC) and Anti-Money Laundering (AML) Policy

Last updated: 15/09/2025

For the purposes of this Policy, reference to LuckyMary includes the associated website: luckymary.com

1. Introduction

This Know Your Player (KYC) and Anti-Money Laundering (AML) policy applies to LuckyMary. This policy outlines the steps and procedures implemented by LuckyMary to ensure that it does not become involved in illegal activities such as money laundering, terrorist financing, or fraud. All players, regardless of their jurisdiction, must adhere to the KYC/AML guidelines set forth by the casino.

Key legal requirements include:

- Conducting proper Know Your Player (KYC) procedures.
- Reporting suspicious transactions to the appropriate authorities.
- Ensuring ongoing monitoring of player activity to detect financial crime patterns.

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2. Objectives

The primary objectives of this policy are:

- **Player Identity Verification:** We will verify the identity of players to ensure they are legitimate players and not engaging in fraudulent or illegal activities. This process includes Know Your Player (KYC) procedures, where individuals provide identification documents such as passports, driver's licenses, and proof of address. Proper verification helps prevent identity theft, account takeovers, and the use of fraudulent accounts.

- **Detection and Reporting of Suspicious Activities:** We will monitor player transactions and behaviors to identify signs of money laundering, fraud, or other financial crimes. This includes detecting unusual betting patterns, rapid deposits and withdrawals, and the use of third-party accounts. If suspicious activities are identified, the casino must report them to the relevant financial authorities through Suspicious Activity Reports (SARs) or other mandatory filings.
- **Regulatory Compliance:** We will adhere to the laws and regulations established by Anjouan and other jurisdictions where we operate. Compliance requirements include anti-money laundering (AML) protocols, player due diligence (CDD), and enhanced due diligence (EDD) for high-risk players.
- **Prevention of Underage Gambling and Illicit Activities:** To uphold responsible gaming policies, we will implement strict age verification processes to prevent minors from accessing gambling services. Additionally, measures should be in place to prevent fraudulent activities such as bonus abuse, identity fraud, and collusion between players.
- **Risk Management for High-Risk Players and Transactions:** We will assess and mitigate risks associated with players from high-risk jurisdictions, Politically Exposed Persons (PEPs), and transactions that exhibit suspicious characteristics.
- **Promotion of Responsible Gaming and Player Protection:** A key priority for us is to encourage responsible gambling by offering self-exclusion programs, deposit limits, and tools that help players manage their spending.

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3. Player Identification and Verification

LuckyMary conducts a player risk assessment for every player to determine their money laundering (ML) and terrorist financing (TF) risk level. This process involves due diligence measures tailored to each player's risk profile to ensure compliance with regulatory requirements and maintain the integrity of the gaming environment.

As part of the Know Your Player (KYC) process, LuckyMary verifies player identity upon account registration. This verification must be completed before players can access specific gaming features, including deposits, withdrawals, and cashouts.

3.1 KYC Documentation Requirements

To verify the identity of a player, the following documents may be requested:

Proof of Identity

- A valid government-issued photo identification document, such as a passport, driver's license, or national identity card.
- The document must be clear, legible, and valid at the time of submission.

Proof of Address

- A document verifying the player's residential address, such as a utility bill (electricity, water, gas) or a bank statement.
- The document must be issued within the last three months and clearly display the player's name and address.

Proof of Payment Method

- To confirm the legitimacy of transactions, players must provide evidence of the payment method used for deposits or withdrawals, which may include a copy of a credit or debit card (showing only the last four digits) or a screenshot or confirmation document from an e-wallet or online banking service.

Source of Funds Declaration

- In cases where a user makes large deposits or exhibits high-risk behavior, additional verification may be required.
- Players may need to provide a declaration of their source of funds and supporting documentation such as bank statements, salary slips, or business income records.

3.2 Age Verification

To prevent underage gambling, LuckyMary enforces strict age verification measures. All players must be over the legal age of majority in their jurisdiction before being allowed to play.

The verification process may include requiring a scanned copy of a government-issued identification document, confirmation of the player's age during the registration process, and additional checks if there is any suspicion of false or misleading information.

Failure to meet the KYC and age verification requirements may result in account suspension, restricted access to gaming features, or account closure in compliance with regulatory obligations.

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4. Player Due Diligence (CDD)

LuckyMary implements a risk-based approach to due diligence, ensuring that appropriate verification measures are taken based on the level of risk each player presents.

4.1 Standard Due Diligence

For most players, the casino applies standard due diligence (SDD) measures to verify their identity and assess any potential risks. This includes obtaining and verifying basic identity documents, ensuring the authenticity of these documents, and screening players against international sanctions lists and Politically Exposed Persons (PEP) databases.

4.2 Enhanced Due Diligence (EDD)

Enhanced Due Diligence (EDD) is conducted for players or transactions that present a higher risk, including high-value deposits or withdrawals, players from high-risk jurisdictions, and transactions exhibiting unusual or suspicious patterns. If a player fails to provide satisfactory documentation, we reserve the right to restrict or suspend account access, block certain transactions, or report the activity to relevant regulatory authorities if necessary.

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5. Monitoring and Reporting of Suspicious Activities

LuckyMary is committed to detecting, preventing, and reporting any activity that may indicate money laundering (ML), terrorist financing (TF), or fraud. In compliance with Anjouan's licensing requirements and Article 11 of the NORUT, we will immediately report any suspicious activity to the relevant Anjouan authorities, including the Financial Intelligence Unit (FIU).

5.1 Monitoring Transactions

LuckyMary will continuously monitor player accounts and transactions for any suspicious activities, including unusually large deposits or withdrawals, a series of rapid and high-value bets, and any transactions that appear inconsistent with the player's usual behavior.

5.2 Deposit Turnover Requirement

To prevent the use of the platform for the movement of funds without genuine gaming activity, deposits cannot be withdrawn immediately after being made and may not be used solely to unlock or facilitate withdrawals.

- Deposited funds must first complete the required turnover through genuine gameplay before becoming eligible for withdrawal.
- Each deposit must be wagered at least twice (2x) before any withdrawal can be processed.
- The deposit turnover requirement is independent of any bonus wagering requirements. Both must be fully satisfied.
- The Operator reserves the right to refuse withdrawals, reverse bonus winnings, suspend accounts, or request enhanced due diligence where deposits appear to have been made solely to satisfy withdrawal eligibility or otherwise circumvent AML controls.

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6. Record Keeping

LuckyMary is committed to maintaining comprehensive records in compliance with Anjouan's regulatory requirements and international anti-money laundering (AML) and counter-terrorism financing (CTF) standards.

6.1 Retention Period and Scope

All KYC and AML documentation, including customer identity verification records, proof of address, proof of payment method, source of funds documentation, transaction history, and Suspicious Transaction Reports (STRs), will be retained for a minimum of five (5) years after the termination of the business relationship with the customer.

6.2 Availability and Compliance

All retained records will be securely stored and made available to regulatory authorities upon request. We will ensure data integrity and confidentiality by implementing secure storage measures in line with applicable data protection laws.

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7. Anti-Money Laundering Training and Awareness

All relevant staff members at LuckyMary will receive regular AML training to ensure they understand their roles and responsibilities in detecting and preventing money laundering and other illegal activities. Training will be conducted annually and include guidance on how to identify suspicious activities and report them to the appropriate authorities.

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8. Risk Assessment and Risk-Based Approach

LuckyMary implements a risk-based approach (RBA) to Know Your Player (KYC) and Anti-Money Laundering (AML) compliance. The casino evaluates multiple risk factors including country of residence, player history and behavior, payment methods used, and transaction size and frequency.

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9. Player Privacy and Data Protection

LuckyMary is committed to safeguarding all player data collected as part of the KYC and AML process. We ensure that personal data is handled with the highest level of confidentiality and in full compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR) where applicable.

Player data is collected solely for verifying identity, ensuring compliance with AML and CTF laws, and preventing fraud, money laundering, and other illicit activities. Personal data will not be shared with third parties unless required by law, regulatory authorities, or with the player's explicit consent.

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10. Independent Audits & Regulatory Inspections

LuckyMary is committed to maintaining transparency, accountability, and compliance with all applicable anti-money laundering (AML) regulations. We conduct annual independent audits and remain fully cooperative with regulatory inspections by the Anjouan Gaming Authority.

Failure to comply with AML regulations may result in corrective actions, financial penalties, or license suspension or revocation in cases of severe or repeated violations.

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11. Compliance Oversight

LuckyMary has appointed a dedicated Compliance Officer responsible for overseeing all aspects of KYC and AML compliance, liaising with regulatory authorities, and ensuring the submission of Suspicious Activity Reports (SARs). LuckyMary will conduct periodic internal audits and implement comprehensive training programs for all employees.

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12. Penalties for Non-Compliance

LuckyMary takes any breach of KYC/AML regulations seriously. Any failure to adhere to KYC obligations may result in administrative penalties including fines and corrective actions, or referral for criminal investigation in cases of serious non-compliance.

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13. Policy Review & Updates

LuckyMary has compiled an AML compliance program that involves internal policies, procedures and controls; a designated compliance officer; an employee screening and training program; and an independent audit function. This policy is reviewed and updated annually to ensure compliance with new AML regulations.

LuckyMary is fully committed to complying with the KYC and AML requirements to protect its players and the broader gaming community from financial crime. We will continue to review and improve our KYC/AML processes to ensure full compliance with Anjouan regulations and international standards.

LuckyMary is owned and operated by Narnium Solutions Ltd.