



GEOLOCATION: TECHNICAL SOLUTIONS & CAPABILITIES

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WHO ARE GEOCOMPLY?

Corporate Background

Since launching in 2011, GeoComply has quickly become the Digital Economy's trusted solution for location compliance, accuracy, and reliability. Its proprietary and highly adaptive technology has successfully met and exceeded all challenges put forth by US regulators with record-high verification rates exceeding 98%.

Today, GeoComply is the market leader in geolocation technology/compliance for Daily Fantasy Sports and internet gaming, and is used by 100% of the US regulated iGaming market base. Our unrivalled geolocation solutions are used to assist operators comply with the world's most stringent geolocation regulations. We have done so with remarkable precision and ease of use, currently processing over 1 million transactions per day across 500 million devices.

GEOLOCATION & INTEGRATED FRAUD SOLUTIONS

Why is Geolocation Important for DFS?

GeoComply's advanced and adaptive geolocation solutions are designed as tools to enable service providers, such as Daily Fantasy Sports sites, comply with restrictions as to where they deliver their services to consumers. Our technology is used to maintain compliance with such applicable state/federal regulatory requirements by providing a more precise, reliable solution than has previously been possible.

Historically, delivering reliable and accurate geolocation on the internet was considered virtually impossible due to the myriad forms of location spoofing that are out there; as well as the weaknesses of geolocation technologies such as cell tower triangulation and geolocation via IP address.

However, thanks to the GeoComply's Matrix of location data sources, anti-fraud tools and data analytics, the paradigm has shifted such that confirming one's location on the internet can be determined to a [very high level of confidence](#).

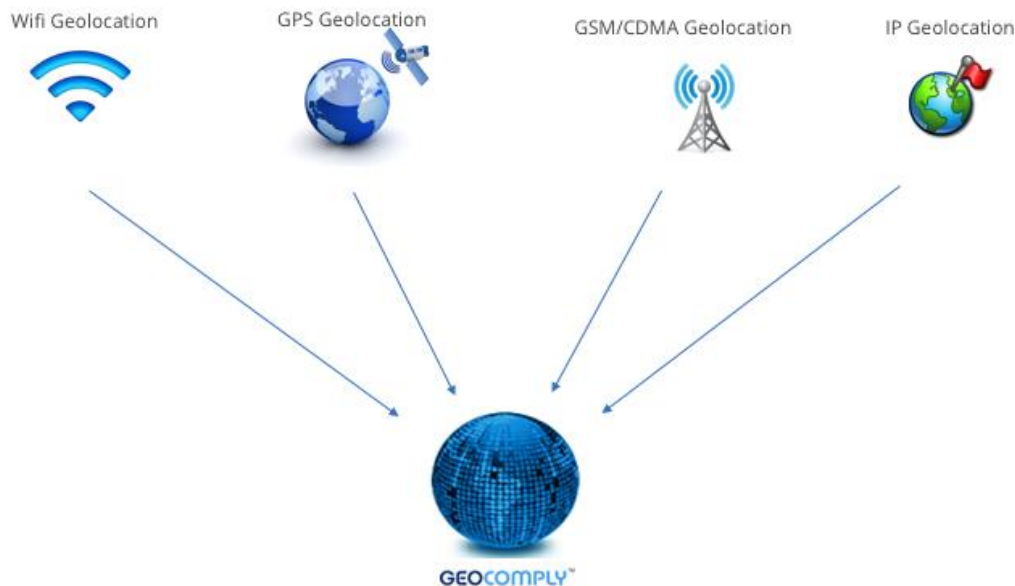
How We Do It

Key Aspects of our Proprietary and Patented Geolocation Solution

GeoComply **Combines & Encrypts Multiple Location Data Sources** for Accurate Location Results, rather than relying on a single source of data for verification.

GeoComply's locations solutions are **device neutral**. We offer secure and accurate location verification solutions for all devices – including desktops, laptops, smartphones, and tablets – so consumer preferences don't have to be ignored. Our technology is embedded directly into the user interface to reduce customer friction and eliminate unnecessary and cumbersome hurdles around technology. This is coupled with a powerful singular back office portal containing tools for customized border configurations, advanced reporting tools, and configurable location parameters.

GeoComply collects Wifi, GPS, GSM, and IP location data from a user's device to deliver highly accurate location results. Carrier data can also be supported if desired. No other location solution exists on the market that provides this level of cross referencing to best determine user location to satisfy compliance needs and anti-fraud systems.



Cross referencing multiple sets of location data, with failover and redundancy protection, delivers the “reasonable assurance” needed to comply with a wide range of regulatory requirements, and augment fraud detection and monitoring.

GeoComply's technology is capable of **proxy, VPN, malware, and enhanced remote desktop detection** to thwart spoofing attempts and high-risk transactions. These tools can be customized to fulfill specific legal and regulatory obligations,

which typically demands high levels of maintenance to keep up with legislative changes and continual technological innovation.

Wrapped around this complex, inter-locking matrix of checks and data-points, is a comprehensive analytics engine that continuously scans and assesses whether any transaction contains irregularities or indications of manipulation. Alerts and reports are constantly being run and investigated by dedicated teams of analysts on both the GeoComply and the Service Provider's side as a final line of defense against potential threats.

GeoComply's geolocation process occurs within an eCommerce website according to the operator's specifications (reason, time, frequency, type of data collected, etc.). The user experience is optimized so that whatever the regulatory and operational requirements of the customer may be, the geodata is captured with the minimum interference to the end-user experience.



Accuracy and Reliability

GeoComply offers pinpoint accuracy to determine a user's exact whereabouts down to a building level and within feet of accuracy. A complete snapshot of a user's location and data vulnerabilities are profiled according to regulatory and business requirements, regardless of the device, connection, operating system, or browser used by the customer.

GeoComply's dynamic selection technology leverages proprietary solutions to customize how/which data sources are used to satisfy federal/state geolocation requirements. We layer on multiple anti-spoofing checks and failover systems in real-

time to ensure the highest pass rate possible with the least customer friction.

Links

Watch our technology demo video presented at the December 2015 RAWA hearing here:

<https://youtu.be/MVyQJHLyERQ>