

The Danish Gambling Authority's guidance on responsible gambling - betting and online casino

Legal guidance on the responsible gambling rules in gambling legislation relating to the provision of betting and operation of online casinos

Contents

Version history	3
Version 1.0 – 26 February 2026	3
Introduction	4
1. Rules and regulations	5
1.1 Gambling Act	6
1.2 Executive orders	6
2. What is responsible gambling?	7
2.1 What is responsible gambling?	8
2.1.1 Player protection requirements	8
2.1.2 Supervision of the rules on responsible gambling	9
3. Information for the player	10
3.1 What information should the player be presented with?	11
3.1.1 Online betting and online casino	11
3.1.2 Land-based betting	14
3.2 The information must be in Danish	15
3.3 Communication between the licence holder and player	16
4. Labelling scheme	17
4.1 The Danish Gambling Authority's labelling scheme	18
4.1.1 Online betting and online casino	18
4.1.2 Land-based betting	19
5. Deposit limit	20
5.1 Deposit limit and requirements	21
5.1.1 Online betting and online casino	21
5.1.2 Land-based betting	22
6. The duty of attention	24
6.1 Identifying players with problematic gambling behaviour	25
6.1.1 How do you identify players with problematic gambling behaviour?	25
6.1.2 Selecting parameters	26
6.1.3 Spending	27
6.2 Measures and interventions	28
6.2.1 Passive measures	28
6.2.2 Active measures (interventions)	29
7. Internal rules and procedures	32
7.1 Internal rules and procedures	33
8. Employee training	35
8.1 Employee training	36
9. ROFUS and the licence holder's self-exclusion option	37
9.1 Register of Voluntarily Excluded Players (ROFUS)	38

9.1.1	General information about ROFUS	38
9.1.2	The licence holder must inform about the option to register in ROFUS.....	39
9.1.3	Requirement to consult ROFUS	39
9.1.4	Marketing.....	40
9.1.5	Information about previous ROFUS registrations	40
9.2	Licence holder's self-exclusion option	41
9.2.1	Additional restrictions.....	42
10.	Section 32 and 34(1) of the Gambling Act	43
10.1	Terms and conditions in the licence.....	44
10.2	Age limit for participation in gambling activities.....	44
11.	Responses in case of non-compliance with obligations.....	45
11.1	Responses in case of non-compliance with obligations.....	46
12.	Offering gambling in Greenland.....	47
12.1	Provision of gambling in Greenland	48
12.1.1	Supplement to section 3.1.1.....	48
12.1.2	Supplement to section 3.2	48
12.1.3	Supplement to section 9.2	48

Version history

Version 1.0 – 26 February 2026

First version of the guidance as this only relates to betting and online casino.

It should be noted that the guidance is based on the provisions of the Gambling Act that relate to responsible gambling and the three executive orders from 2025 on online casino, online betting and land-based betting. The provisions on responsible gambling are not new, but in this version 1.0, the Danish Gambling Authority provides more examples than before on how to comply with the provisions. The guidance also contributes with what the Danish Gambling Authority considers good practice.

The Danish Gambling Authority also points out that the authority has changed its interpretation of the provision on setting a deposit limit in the three executive orders. Thus, there has been a change in practice, and in future inspections, the Danish Gambling Authority will assess whether licence holders have complied with the obligation as described in this version of the guidance.

Introduction

This guidance is intended for betting and online casino licence holders and other relevant stakeholders. The guidance reviews the responsible gambling requirements for licence holders in the gambling legislation.

In addition to reviewing the specific rules, the guidance provides guidelines and interpretations on what licence holders should do more specifically to comply with responsible gambling obligations. In areas where it is left to the discretion of the licence holder, the guidance provides instructions on how to comply with the rules.

The guidance also includes an introduction to responsible gambling and explains why responsible gambling is important to be aware of when offering gambling products and services.

The guidance is divided into general topics applicable to all licence holders, and under the individual sections divided respectively for online betting and online casino and land-based betting to the extent necessary.

It should be noted that some rules regarding marketing are based on responsible gambling. The rules that deal with the requirements that licence holders must meet when advertising are not covered in this guidance. Instead, reference is made to the Danish Gambling Authority's guidance on sales promotion, which is available on the Danish Gambling Authority's website.

It is also noted that some of the rules and the assessment of whether licence holders offer gambling in a responsible manner have a certain overlap with the rules on anti-money laundering and financing of terrorism. Licence holders can therefore benefit from combining the two areas and refer to the Danish Gambling Authority's guidance on the prevention of money laundering and financing of terrorism when reviewing responsible gambling procedures.

The Danish Gambling Authority uses the term "player" throughout the guidance. "Player" describes the person who is in a customer relationship with a gambling operator.

The guidance is available in an English version on the Danish Gambling Authority's website. However, the Danish Gambling Authority points out that it is the Danish version of the guidance that takes precedence if there is any doubt of interpretation in relation to the English version.

The guidance is continuously updated as regulations and practices are added or changed and developed. The most significant content changes are listed in the version history.

Rules and regulations

1

1.1 Gambling Act

This guidance is based on Consolidation Act no. 1182 of 22 September 2025 on Gambling.

The guidance focuses on the provisions specifically related to responsible gambling that licence holders are obliged to comply with. It is section 32 and 34(1) of the Gambling Act.

1.2 Executive orders

In addition to the provisions of the Gambling Act, rules on responsible gambling are also regulated in various executive orders issued pursuant to section 41(1) of the Gambling Act.

These are the following executive orders:

1. Executive Order no. 682 of 11 June 2025 on Online Casino.
2. Executive Order no. 684 of 11 June 2025 on Online Betting.
3. Executive Order no. 686 of 11 June 2025 on Land-based Betting.

This guidance focuses solely on the above three executive orders as these are the ones that regulate the provision of betting and online casino. In some cases, there are rules that only apply to one of the areas. If so, it will be clearly stated in the guidance.

In the guidance, references to specific provisions in the three executive orders will appear in a text box as an introduction to each section. This is chosen to increase readability.

**What is responsible
gambling?**

2

2.1 What is responsible gambling?

The Danish Gambling Authority is tasked with protecting players by ensuring that gambling is offered in a fair, responsible and transparent manner. This is stated in section 1 of the Danish Gambling Act.

Section 1 of the Danish Gambling Act

The purpose of the Act is

1. to keep the spending on gambling at a moderate level,
2. to protect young people or other vulnerable persons from being exploited through gambling or developing addiction to gambling;
3. to protect players by ensuring that gambling is offered in a fair, responsible and transparent manner, and
4. to ensure public order and prevent gambling from serving as support for crime.

The provision is a declaration of intent, which means that the Act must be administered taking into account the above-mentioned purposes. Actions in violation of section 1 of the Gambling Act are therefore not punishable in themselves, but the provision will be included in the interpretation of the other provisions of the Gambling Act.

The fact that the consumption of gambling must be kept at a moderate level means, among other things, that the licence holder must be aware of the gambling spend of the individual player.

The fact that young people or other vulnerable people must be protected from being exploited through gambling or developing an addiction to gambling means, among other things, that the licence holder has an obligation to prevent problematic gambling behaviour and gambling addiction and to identify and help the players who show signs of problematic gambling behaviour.

The licence holder has a duty to ensure that the four objectives of the Gambling Act are complied with. This is done, for example, by complying with the requirements of the executive orders that regulate the specific gambling sectors, as well as by complying with the requirements of the terms of the licence.

2.1.1 Player protection requirements

Gambling always involves a risk of loss of control and the development of harmful consumption of gambling, which can lead to gambling addiction. Therefore, the licence holder is always obliged to organise its range of gambling products in a way that protects the player against the risk of developing problematic gambling behaviour and the harms of gambling.

Problematic gambling behaviour is used in the guidelines as a collective concept that describes risky gambling behaviour and negative consequences of gambling. The term denotes a spectrum of problematic gambling behaviour, which in the most severe cases can be to a degree that in a clinical context can be diagnosed as gambling addiction. Gambling addiction is characterised, among other things, by the player maintaining a destructive and harmful behaviour, even though the player's actions lead to negative consequences.

The harms of gambling include a negative impact on the person's physical and mental health, social well-being and relationships, development, education, and job and finances.

In order to protect players, it is a prerequisite that the licence holder obtains knowledge of the subject area. This knowledge is to be used to qualify the licence holder's interventions, partly

when information is provided about potential harms of gambling, measures are taken in connection with information about the licence holder's protective responsible gambling tools and partly for the qualification of e.g. risk markers as well as for the design of risk-reducing measures.

2.1.2 Supervision of the rules on responsible gambling

The Danish Gambling Authority works on the basis of the Danish Gambling Act for a fair and legal gambling market and to protect players.

This work results in, among other things, the Danish Gambling Authority's supervisory task of ensuring that licence holders comply with the rules on responsible gambling. The term "responsible gambling" thus also covers the rules that the licence holder must comply with in order to protect its players.

The Danish Gambling Authority supervises the rules on

1. the duty to provide information,
2. the use of the Danish Gambling Authority's labelling scheme,
3. the deposit limit and the requirements for it;
4. the duty of attention,
5. internal rules and procedures;
6. training of employees;
7. ROFUS and the licence holder's own self-exclusion tool,
8. compliance with the terms and conditions of licences for the provision of betting and the operation of online casinos; and
9. that the licence holder does not accept stakes for gambling from persons under the age of 18.

The detailed content and interpretation of the above provisions will be elaborated in the following chapters.

Information for the player

3

3.1 What information should the player be presented with?

The three executive orders require the licence holder to present the player with a range of information and tools. This information and tools for the provision of online betting and online casino are discussed below in section 3.1.1. The information for land-based betting is discussed separately in section 3.1.2.

3.1.1 Online betting and online casino

Section 15(1-4) of the Executive Order on Online Casino
Section 13(1-4) of the Executive Order on Online Betting

Paragraph 1 of the provisions states that the licence holder's website or user interface shall:

1. state that it is not permitted for persons under the age of 18 to participate in the games,
2. inform about responsible gambling and the potential harms of gambling, where the information shall be prepared in cooperation with a gambling addiction treatment centre,
3. provide access to a self-test for gambling addiction,
4. provide information and contact addresses of Danish treatment centres for gambling addiction,
5. refer to the Danish Gambling Authority's responsible gambling helpline; and
6. inform of the possibility to register in the register of voluntarily excluded players (ROFUS), cf. section 25 (online casino)/section 19 (online betting).

Re 1) The age limit for participation in gambling must be stated on the licence holder's website or user interface. It is considered sufficient that the licence holder uses the wording "18+", for example.

Re 2) To ensure that the information on responsible gambling and the potential harms of gambling is accurate, it must be prepared in collaboration with a gambling addiction treatment centre. The Danish Gambling Authority assesses that the information can also be prepared in collaboration with a person researching treatment of gambling addiction or similar or by treatment centres that are not necessarily Danish state-funded treatment centres. The crucial part is that the information is qualified by gambling addiction treatment professionals. It is worth noting that the Danish Gambling Authority considers it good practice to communicate the information in easy-to-read formats that present the messages clearly to the player.

Re 3) There are several different self-tests for gambling addiction. There is freedom of choice between which type of self-test the licence holder provides access to, as long as the self-test on a qualified basis can actually indicate the risk level of the player's gambling behaviour. It is also a requirement that the test is in Danish. The Danish Gambling Authority's Certification Programme for betting and online casino states in section 3.3.2(3) that there must be a link to a self-test for gambling addiction on the licence holder's user interface.

The Danish Gambling Authority considers it good practice that the test result is supplemented with a description of the player's risk level and that the player is presented with recommendations to control their gambling or seek help to control their gambling if the test result indicates a need for this.

On the StopSpillet website there is a self-test that is free for licence holders to use. Licence holders can fulfil the self-test referral requirement by linking directly to the StopSpillet self-test. The link can be accessed here: [StopSpillet - Test yourself](#).

Re 4) It is noted that referral to a single treatment centre will not be sufficient. The Danish Gambling Authority considers it most appropriate to refer to all state-funded treatment centres. An updated list is available on StopSpillet.dk.

Re 5) Referral to the Danish Gambling Authority's national helpline on gambling addiction, StopSpillet, must be made in a way that makes it easy for the player to find the helpline's contact details. This can be done, for example, by linking directly to StopSpillet's website and by providing the phone number for StopSpillet.

Referrals to StopSpillet must also be communicated in a way that provides specific information about what is being referred to.

1. Examples of how the player can be made aware of what StopSpillet is:

The Danish Gambling Authority's helpline on gambling addiction 'StopSpillet'
Helpline on gambling addiction: StopSpillet

Re 6) Similarly, information about the option to register in the register of voluntarily excluded players, ROFUS, must be provided in such a way that there is no doubt about what ROFUS is.

2. Examples of how to make the player aware of what ROFUS is:

Self-exclusion: ROFUS
Exclude yourself via ROFUS

It must be clear that this is a self-exclusion option, so the text 'ROFUS' alone is not sufficient.

This also means that the use of the ROFUS logo alone is not sufficient either. However, the logo can be used in combination with a descriptive text. Licence holders can find a logo package for ROFUS on the Danish Gambling Authority's website. The logo is available both with and without descriptive text.

Paragraph 3 states that the front page of the licence holder's website or user interface must state that the licence holder is licensed and supervised by the Danish Gambling Authority.

Access to the Danish Gambling Authority's website must also be provided. This is stated in paragraph 4. There is no requirement for this access to be present on all pages of the website.

3.1.1.1 Prominent place

Paragraph 2 of the provisions states that the information must be placed in a prominent place on the licence holder's website or user interface, and that the information must be accessible from all pages of the website.

User interface means any media on which the licence holder offers gambling. In addition to a website, it can be an app.

The fact that the information must be placed in a prominent place on the licence holder's website or user interface requires that it is made easy for the player to find the information.

It is therefore the Danish Gambling Authority's assessment that the player must be presented with information about responsible gambling immediately when the player visits the licence holder's website. This means that the player does not have to scroll to the bottom of the website to find the information, but that it is available instantly. The same applies if the player accesses the licence holder's games via an app.

It is important that the information is given in precise language and not mixed with other information so that the information is clear and easy to understand for the player.

3. Example

The licence holder can gather the information under a meaningful heading that is easy to see on all pages. For example, the headline could be: *Information about responsible gambling, gamble responsibly* or similar.

The fact that the information must be accessible from all pages on the website requires that the information is located a maximum of one click away from all pages on the website. This means that it must not be possible to click into pages or games that require multiple clicks to find the information. The same requirement applies if the licence holder offers gambling via an app.

3.1.1.2 Rules only applicable to online casino: Clock on the website

Section 17 of the Executive Order on Online Casino

Please note that this rule only applies to online casino.

The player must be able to keep track of their time spent. Therefore, the licence holder's website or app must have a clock that is always easily visible to the player. The clock must not be based on the player's equipment, which means that it is not sufficient that the player has a clock on their own computer or phone.

The clock must be visible to the player during the entire log on session. This means, for example, that it must not be possible for the player to click or scroll away from the clock.

A clock does not necessarily mean a traditional clock or a specific time zone. For example, a timer function that starts when the player logs in can be used instead.

3.1.1.3 Rules applicable only to online bingo via TV

Section 18 of the Executive Order on Online Casino

A licence holder that provides online bingo via TV and does not have a website must make the information available to the player by other means as mentioned in section 3.1.1.

The information that the licence holder must provide during the broadcast itself is:

1. the age requirement of 18 years,
2. that the licence holder is licensed and supervised by the Danish Gambling Authority, and
3. where the licence holder makes the additional information available.

For a more detailed explanation of the requirements for the individual information, see section 3.1.1 on online betting and online casino.

3.1.2 Land-based betting

Section 14(1) and (2) of the Executive Order on Land-based Betting

It appears from the provision that the point of sale must:

1. state that it is not permitted for persons under the age of 18 to participate in the games,
2. inform about responsible gambling and the potential harmful effects of gambling, where the information shall be prepared in cooperation with a gambling addiction treatment centre,

3. provide information and contact addresses of Danish treatment centres for gambling addiction,
4. refer to the Danish Gambling Authority's responsible gambling helpline,
5. inform of the possibility to register in the register of voluntarily excluded players, cf. section 19; and
6. state that the licence holder is licensed and supervised by the Danish Gambling Authority.

Re 1) It is required that the licence holder has instructed the employees at the points of sale to be aware of checking the identification of young people who want to gamble, so that it is effectively ensured that young people under the age of 18 do not have access to gambling.

Re 2) To ensure that the information on responsible gambling and the potential harms of gambling is accurate, it must be prepared in collaboration with a gambling addiction treatment centre. The Danish Gambling Authority assesses that the information can also be prepared in collaboration with a person researching treatment of gambling addiction or similar or by treatment centres that are not necessarily Danish state-funded treatment centres. The crucial part is that the information is qualified by gambling addiction treatment professionals. It is worth noting that the Danish Gambling Authority considers it good practice to communicate the information in easy-to-read formats that present the messages clearly to the player.

Re 3) It is noted that referral to a single treatment centre will not be sufficient. The Danish Gambling Authority considers it most appropriate to refer to all state-funded treatment centres. An updated list is available on StopSpillet.dk.

Ad 4) Referral to the Danish Gambling Authority's national helpline on gambling addiction, StopSpillet, must be made in a way that makes it easy for the player to find the helpline's contact details, e.g. by providing the phone number for StopSpillet. See below in section 3.1.2.1 for more details.

Reference to the StopSpillet must be stated in such a way that the player is made aware of what is being referred to.

4. Examples of how the player can be made aware of what StopSpillet is:

The Danish Gambling Authority's helpline on gambling addiction 'StopSpillet'
Helpline on gambling addiction: StopSpillet

Re 5) Similarly, information about the option to register in the register of voluntarily excluded players, ROFUS, must be provided in such a way that there is no doubt about what ROFUS is.

5. Examples of how to make the player aware of what ROFUS is:

Self-exclusion: ROFUS
Exclude yourself via ROFUS

It must be clear that this is a self-exclusion option, so the text 'ROFUS' alone is not sufficient. It also means that the use of the ROFUS logo alone is not sufficient either. However, the logo can be used in combination with a descriptive text.

Licence holders can find a logo package for ROFUS on the Danish Gambling Authority's website. The logo is available both with and without descriptive text.

Re 6) The point of sale must state that the licence holder is licensed and supervised by the Danish Gambling Authority.

3.1.2.1 Prominent place

The information must be placed in a prominent place at the point of sale and the player must be presented with the information before participating in the game.

Point of sale means each cash register or self-service terminal from which it is possible to purchase gambling products.

The licence holder must ensure that the information is given real prominence. For example, if it is prioritised that the information should appear on the point-of-sale counter, ensure that the information is not covered with merchandise or similar.

If the licence holder offers betting products via digital solutions, such as self-service terminals and tablets, the information in paragraph 1 must be placed in a prominent place on the user interface and must be accessible from all sides.

The information can also be displayed on posters or info screens. If info screens are used, it is the licence holder's responsibility to ensure that the screen is always in operation. If info screens are used, it must be ensured that the information is not switched in very long "scrolls" that make you wait a long time to see the information. It must also be ensured that the information to be provided is visible long enough for the player to actually read it.

The fact that the player must be presented with the information before participating in the game means that it will not be sufficient to provide the information together with the coupon. Instead, the Danish Gambling Authority considers it good practice if a pop-up window appears on the screen before the purchase is made.

In addition, the point of sale may have some of the information in a form that can be handed out or taken by players. This could be a flyer with information about responsible gambling and the potential harms of gambling as well as information about the Danish Gambling Authority's helpline StopSpillet and contact addresses of Danish state-funded treatment centres.

3.2 The information must be in Danish

Section 14, first sentence of the Executive Order on Online Casino
 Section 18(1) of the Executive Order on Online Casino
 Section 12, first sentence of the Executive Order on Online Betting
 Section 13, first sentence of the Executive Order on Land-based Betting

All information that licence holders are obliged to make available to the player must be available in Danish on the licence holder's website, at the point of sale or, in the case of online bingo, otherwise. This is a requirement in the three executive orders.

3.3 Communication between the licence holder and player

Section 14, second sentence of the Executive Order on Online Casino
 Section 12, second sentence of the Executive Order on Online Betting
 Section 13, second sentence of the Executive Order on Land-based Betting

It follows from the three executive orders that all communication between licence holder and player must be in Danish.

The Danish Gambling Authority therefore considers it a violation of the rules on responsible gambling if communication from the licence holder to the player about responsible gambling is not in Danish, unless the player takes the initiative to use another language. The Danish

Gambling Authority notes in this regard that responsible gambling communication often takes place to players who are in a particularly vulnerable situation, and as a result, language must not constitute an additional barrier.

Labelling scheme

4

4.1 The Danish Gambling Authority's labelling scheme

The main purpose of the Danish Gambling Authority's labelling scheme is to help players get an overview over which gambling operators are licensed to offer gambling products and services on the Danish market.

The individual requirements for the provision of online betting and online casino are discussed below in section 4.1.1. The requirements for land-based betting are discussed separately in section 4.1.2.

4.1.1 Online betting and online casino

Section 16 of the Executive Order on Online Casino
Section 14 of the Executive Order on Online Betting

The licence holder must use the Danish Gambling Authority's labelling scheme on their website or user interface. As mentioned earlier, a user interface can be an app, for example.

It is a requirement that the Danish Gambling Authority's label must be placed on the front page of the licence holder's website. On other pages of the website, the label must be easily visible to the player.

The licence holder shall always use the latest published version of the label prepared by the Danish Gambling Authority. The licence holder may not change the design, proportions or colours of the label.

The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

The label may not be used by the licence holder's partners or other parties that do not have a licence from the Danish Gambling Authority.

In order to fulfil the purpose of the labelling scheme, the label must be used in such a size that the text on the label: "Tilladelse fra Spillemyndigheden" is legible. Players who are not otherwise familiar with the label must be able to see that the gambling operator has a licence from the Danish Gambling Authority.

Whether the readability criterion is met will always depend on a specific assessment, taking into account what is possible given the technical and spatial limits of the website or user interface.

6. Example

If the size of the label is 90 x 90 pixels, this will be considered sufficient in most cases.

The readability criterion only includes that the label must appear at least once in an easily visible location on the page in a size where the text on the label is legible. It is therefore compatible with the labelling scheme to have one or more supplementary versions of the label in a smaller size, for example at the top of the website, even if the text on all labels is not legible. The Danish Gambling Authority's label shows that the gambling operator has a licence from the Danish Gambling Authority and that the Danish Gambling Authority supervises the gambling operator.

The latest published version of the label can be downloaded at spillemyndigheden.dk. The label must be used exactly as it is and must not be altered in any way. This means that the label cannot be used in e.g. black and white or faded colours.

Only gambling operators with a licence to offer gambling products and services in Denmark are allowed to use the Danish Gambling Authority's label on their websites, in their marketing material, etc. Gambling operators who use the label without a licence may be liable under the Danish Marketing Practices Act.

For more information about the Danish Gambling Authority's labelling scheme, see [Guidelines for using the Danish Gambling Authority's labelling scheme](#).

4.1.2 Land-based betting

Section 15 of the Executive Order on Land-based Betting

The licence holder must ensure that the Danish Gambling Authority's labelling scheme is used at the point of sale. The label must be easily visible to the player.

The licence holder shall always use the latest published version of the label prepared by the Danish Gambling Authority. The licence holder may not change the design, proportions or colours of the label.

The label must not be used in a way that gives the impression that the Danish Gambling Authority is a co-organiser or sponsor.

The label may not be used by the licence holder's partners or other parties that do not have a licence from the Danish Gambling Authority.

Deposit limit

5

5.1 Deposit limit and requirements

A deposit limit is a limit on the total amount of money a player can deposit from an external source into their gambling account. Stake limits for the games themselves are therefore not regulated by the provision, but the licence holder may choose to also have rules for maximum stakes in the games.

The individual requirements for the provision of online betting and online casino are discussed in section 5.1.1. The requirements for land-based betting are discussed separately in section 5.1.2.

5.1.1 Online betting and online casino

Section 21(1) of the Executive Order on Online Casino
Section 15(1) of the Executive Order on Online Betting

A player must set a deposit limit before play can commence. This is a tool for the player to consider what they can afford to gamble for. The Danish Gambling Authority considers it good practice if the licence holder requires that the setting of a deposit limit is a mandatory part of opening a gambling account. Furthermore, the Danish Gambling Authority considers it good practice if the player, when setting the deposit limit, is made aware that a deposit limit should be realistic in relation to the player's financial situation.

5.1.1.1 Daily, weekly or monthly

The player must be able to choose whether the deposit limit is daily, weekly or monthly.

As a minimum, the player must set one of the following deposit limits:

1. limit on total daily deposits to the gambling account,
2. limit for total weekly deposits on the gambling account, or
3. limit for total monthly deposits to the gambling account.

Daily is understood as the beginning of a day until the end of a day. Weekly is understood as Monday to Sunday. Monthly is understood as the first day of the month to the last day of the month. The Danish Gambling Authority notes that a rolling limit (a deposit limit beginning when the deposit is made) is not in accordance with the rules on deposit limits.

5.1.1.2 Amount to be determined by the player

It is important that the player actively decides on the amount of the individual deposit limit. Therefore, a default amount must not be suggested for the player to choose if the player does not take a position. It is only an upper deposit limit that may be predetermined by the licence holder.

5.1.1.3 Withdrawals from gambling account

Withdrawals of winnings from the gambling account may not be offset against the deposit limit. This means that the deposit limit actively set by the player will remain in effect, regardless of what the player may withdraw from the gambling account.

5.1.1.4 Loss limitation and other restrictions

It is permitted to offer the player additional restrictions, for example in the form of loss limitation or blocking of specific game types such as gaming machines, table games, betting or similar, as long as it is clearly stated what the restriction is.

Loss limitation may only be a supplement to the determination of the statutory deposit limit and may not replace it.

If the licence holder chooses to make additional mitigation options available, the licence holder must make it very clear what is offered. For example, if loss limitation is offered, it must apply to all games unless it is very clearly stated that loss limitation only applies to certain game types.

5.1.1.5 Increase or decrease

Section 21(2) of the Executive Order on Online Casino
Section 15(2) of the Executive Order on Online Betting

A player's request to increase a previously set deposit limit may take effect after 24 hours at the earliest. This is to ensure that the deposit limit is actually effective, and that the player cannot increase the limit continuously. Conversely, a reduction in the contribution limit must take effect immediately.

5.1.2 Land-based betting

Section 12(1), 1st sentence of the Executive Order on Land-based Betting
Section 12(2) of the Executive Order on Land-based Betting

A player shall set a deposit limit when issuing a means of identification, unless a deposit limit has already been set when opening an online gambling account with the same licence holder. The Danish Gambling Authority considers it good practice if the player, when setting the deposit limit, is made aware that a deposit limit should be realistic in relation to the player's financial situation.

Placing bets where the payment is made at the point of sale counts towards the deposit limit as a deposit.

5.1.2.1 Daily, weekly or monthly

Section 12(1), second sentence of the Executive Order on Land-based Betting

The player must be able to choose whether the deposit limit is daily, weekly or monthly.

As a minimum, the player must set one of the following deposit limits:

1. limit on total daily deposits to the gambling account,
2. limit for total weekly deposits on the gambling account, or
3. limit for total monthly deposits to the gambling account.

Weekly is understood as Monday to Sunday. Monthly is understood as the first day of the month to the last day of the month.

5.1.2.2 Placing bets and paying out winnings

Bets placed at the point of sale must always be counted towards the deposit limit. Regardless of whether the bet is paid with the gambling account, in cash or with a payment card, the bet is thus registered on the player's means of identification and thus also on the gambling account. The means of identification is linked to the gambling account and the deposit limit therefore also applies to land-based betting.

Withdrawals of winnings from the gambling account may not be offset against the deposit limit. This means that the deposit limit actively set by the player will remain in effect, regardless of what the player may withdraw from the gambling account.

It is permitted to offer the player additional restrictions, e.g. in the form of a loss limitation or similar, as long as it is clearly stated what the restriction is. Loss limitation may only be a supplement to the determination of the statutory deposit limit and may not replace it.

5.1.2.3 Increase or decrease

Section 12(3) of the Executive Order on Land-based Betting

A player's request to increase a previously set deposit limit may take effect after 24 hours at the earliest.

This is to ensure that the deposit limit is in fact effective, and that the player cannot increase the limit continuously. Conversely, a reduction in the deposit limit must take effect immediately.

The duty of attention

6

Duty of attention in brief

A licence holder shall become familiar with the player's gambling patterns and shall take measures to prevent and stop the player from developing problem gambling behaviour and gambling addiction.

This obligation is commonly referred to as the "duty of attention" and means that the licence holder must have active methods and procedures in place to protect its players from the potential harmful effects of gambling, such as overuse, loss of control, problem gambling behaviour and gambling addiction.

Section 22(1) of the Executive Order on Online Casino
Section 16(1) of the Executive Order on Online Betting
Section 16(1) of the Executive Order on Land-based Betting

6.1 Identifying players with problematic gambling behaviour

The licence holder can make use of a fully automated solution or automated flagging of cases for manual assessment. What matters is that it is an approach that ensures that the licence holder actually becomes familiar with the player's gambling patterns.

The chosen methodology must also ensure that the licence holder identifies those players whose gambling patterns indicate problematic gambling behaviour as well as those players who show signs of gambling addiction.

In addition, the licence holder shall actively use the information obtained from the analysis of gambling patterns to take measures to prevent and avoid the development of problem gambling behaviour or gambling addiction.

6.1.1 How do you identify players with problematic gambling behaviour?

The licence holder may, by analysing gambling patterns, classify the licence holder's players into different risk levels. The licence holder may have different procedures for intervention with players at different risk levels, but the duty of attention requires that the intervention for the specific player includes measures that can prevent and avoid the development of problem gambling behaviour and gambling addiction.

7. Example

Gambling operator X uses machine learning to identify players who show signs of problem gambling behaviour. Built into this software are four risk groups (A, B, C and D).

Group A shows signs of rapid loss of control. Group A receives a phone call by an employee, who first looks at the gambling pattern.

Group B shows concerning signs of especially an increase in time spent. Group B receives an autogenerated e-mail describing what an increase in time spent can be a sign of, and that it is a cause of concern. The e-mail also contains a link to a self-test.

Group C shows concerning signs of increased losses. Group C receives an autogenerated e-mail describing what an increase in losses can be a sign of, and that it is a cause of concern. The e-mail also contains a link to a self-test.

No procedures are initiated regarding Group D, which constitutes gambling operator X's remaining customers.

8. Example

Gambling operator Y uses a point system to sort players who shows signs of problematic gambling behaviour. Gambling operator Y splits the players into four risk groups (A, B, C and D). Two risk levels are built into the point system.

If a player has a low score, the player is categorised in group C. Other players are handled by a manual review by gambling operator Y. The manual review splits these players into four groups.

These initiatives must help to ensure that gambling operator Y meets the requirement for taking measures to prevent problem gambling.

6.1.2 Selecting parameters

The following are examples of parameters that can help to familiarise oneself with the player's gambling pattern and which can be included in the risk assessment of the player. Thus, other and more parameters than those mentioned can be used, and there is no specific requirement on how many parameters to use. However, a single parameter will not be enough, and the parameters must be combined.

Examples of parameters¹

Stakes

- Number and total amount

Game speed

- Distance in time between stakes

Deposits

- Number and total amount
- Total amount paid in net, i.e. where payouts are deducted

Cancelled withdrawals

- Number

Player inquiries

- Number and type ²

Time consumption

- How much time is spent gambling every day?
- Possibly also how many hours in a day do you place at least one game

Gambling products

- Number

Responsible gambling tools

- Number of changes made by the player³

Losses

- Total amount (stakes - winnings = losses)

Interactions between parameters should also be taken into account. This means that the interpretation of each parameter should depend on the other parameters and not stand alone. Particular attention is warranted if data or statements from the player indicate that the player is trying to win back lost money.

¹ The Danish Gambling Authority follows the parameters of the standard DS/EN 18144:2025 Online gambling – Risk indicators to support identification and prevention of risky and problematic gambling behaviour. Potential definitions and time scales are available in the standard.

² It should be noted that this does not change the fact that there may be situations where player inquiries require direct attention from the licence holder, see box with examples in section 7.1.1.1.

³ It should be noted that it is of course important that the player uses the responsible gambling tools available, but the licence holder must be aware of the number of changes to responsible gambling tools (e.g. deposit limits) made by the player, as this can say something about the player's gambling pattern.

6.1.2.1 Information on cash flows

Please note that cash flow information (deposits, withdrawals, card changes, cancelled withdrawals, etc.) are only game patterns in an extended sense of the word. Therefore, these parameters cannot stand alone but can be included in the overall assessment. What is referred to as genuine gambling data, such as stakes, time of play and game type, must therefore be included to a significant extent in the assessment of gambling patterns. It is therefore also acceptable to give less importance to information about cash flows if stakes, winnings etc. are considered instead, which will eventually provide the same information as deposits and withdrawals.

Each player's financial leeway will always be individual and, as a result, there will be variation in when each player's spending will have negative consequences for their personal finances.

Even if a player can finance their gambling, gambling can have other negative consequences and cause harms in their lives in other ways.

The amount gambled can therefore never be the only marker a licence holder uses to fulfil its obligation to provide responsible gambling.

6.1.2.2 Demographics

Please also note that demographic data such as age, gender and ethnicity, geographical location, etc. do not constitute game data. This data cannot be included in the analysis of gambling patterns.

It is essential to look at the player's gambling patterns and thus contact a player based on how the player gambles and not on who the player is.

Of course, this does not prevent the licence holder from paying special attention to players who have just created a gambling account.

6.1.3 Spending

Big spending is a particular problem because within a short period of time it can have far-reaching and long-lasting consequences for the player. Therefore, the licence holder must have procedures in place to ensure that the player is investigated before the player has lost large amounts of money. This investigation should not wait for the usual analysis of gambling patterns if it is not updated regularly. The Danish Gambling Authority considers it good practice that the licence holder pays special attention to players who have just created a gambling account and where the licence holder has not yet identified a gambling pattern. Big spending by a new player can thus indicate problematic gambling behaviour or gambling addiction. The Danish Gambling Authority also considers it good practice that the licence holder supplements the chosen method so that all players who lose more than DKK X on Y days are immediately selected for manual review or subjected to an automated, active intervention. The licence holder is thus allowed to supplement the more advanced analyses with limits set on a single parameter.

9. Example

Player A tends to have intense gambling sessions where Player A deposits numerous times in a short period of time, resulting in high daily losses. Despite this, the algorithm of gambling operator X manages to send player A generic responsible gambling message not until after six months, and then player A is contacted by a targeted intervention not until after seven months.

In this case, it is assessed that gambling operator X chose too late to intervene against player A.

The Danish Gambling Authority considers it good practice for the licence holder to always pay extra attention if a player's spending is high compared to an average Dane's income (in 2023, the average income per person before tax was DKK 395,500 per year⁴). The licence holder should also take into account the recommended disposable income, as this is an indication of how much a Dane has at their disposal each month after all fixed expenses are paid.

6.2 Measures and interventions

The licence holder has an ongoing obligation to take appropriate measures and interventions towards players whose gambling patterns indicate a need for this.

As part of the provision to protect players, the licence holder must ensure that preventive measures and interventions are implemented for all players. It is considered as two independent goals to prevent problem gambling behaviour and gambling addiction. It is not sufficient to only have measures and interventions in place for players with a gambling pattern that indicates problem gambling behaviour.

Preventive measures can be both passive and active.

Passive measures

All responsibility measures implemented by the licence holder to prevent problem gambling behaviour that are not specifically targeted at the individual player.

Active measures (interventions)

All responsibility measures that are applied to an individual player or group of players based on their specific and current gambling behaviour.

The licence holder shall continuously develop and evaluate its measures to prevent players from developing problem gambling behaviour and gambling addiction.

The licence holder must therefore assess the effect of the interventions and measures implemented.

6.2.1 Passive measures

Passive measures can for example be when the licence holder on its website or user interface informs about responsible gambling and the potential harmful effects of gambling, refers to the Register of Voluntarily Excluded Players (ROFUS), refers to the Danish Gambling Authority's helpline on gambling addiction StopSpillet and similar.

Passive measures should have a design and language that makes it easy for the recipient to decode the content and relate to their own gambling. This can be in the form of concrete messages that encourage specific responsible gambling actions, such as taking a break from the game or considering current deposit limits.

⁴ [Personal and family income - Statistics Denmark](#)

10. Examples of specific messages

Take a break

Never try to win back what you've lost

Decide on your deposit limit

Standardised pop-ups or standardised responsible gambling emails sent to all players, regardless of consumption or gambling behaviour, should be designed in the same clear way and highlight the positive benefits of using responsible gambling tools.

6.2.2 Active measures (interventions)

Active measures are interventions aimed directly at a player based on their specific and current gambling behaviour that can motivate the player to regulate their gambling spend so that it does not become harmful. This can be communication in the form of pop-ups, emails, reports or phone calls that give the player feedback on current losses, time spent or other negative changes in gambling history, gambling pattern or gambling behaviour.

The Danish Gambling Authority considers it good practice that the licence holder makes the intervention relevant to the individual player by adapting the form of communication, scope, and content of the intervention to the player's gambling pattern and risk level.

At the same time, the licence holder must ensure that the player is made aware that any active intervention is an active, individualised intervention. This is done by highlighting that it is the player's gambling pattern that gives rise to the intervention, so it cannot be confused with generic approaches to all customers.

11. Example

Gambling operator X has described in its responsible gambling procedures that a player classified as a high-risk player enters a four-week monitoring period, followed by a reassessment of the risk level. When a player is in a four-week monitoring period, the player receives individualised responsible gambling information via email. The player is also blocked from receiving marketing during this period. Regardless of whether this procedure is followed, gambling operator X must still consider the specific situation of the player in question.

This is an example of an active intervention by the gambling operator.

12. Example

Gambling operator X has described in its responsible gambling procedures that a player classified as a high-risk player shall receive pop-up messages, care calls and also emails containing responsible gambling information. The interventions in question must be suitable to prevent problem gambling behaviour for a specific player, and gambling operator X must therefore consider whether the measures in question are all suitable or whether there should be an increased focus on one of them, possibly supplemented with others.

The communication to the player should highlight the parameters that indicate that the player has developed problems controlling their gambling and has therefore given the licence holder reason to respond with an active intervention.

The player must also be actively made aware of the possibilities to make use of the licence holder's responsible gambling tools, such as downward adjustment of deposit limits and self-

exclusion, and receive information about other support measures, including StopSpillet, ROFUS and state-supported treatment options. This can be done both in writing and verbally.

It is clarified that the obligation to perform active interventions can be complied with even if the licence holder deviates from an otherwise standardised intervention program if the player responds inappropriately to the interventions. A player who reacts dismissively and declines contact should not necessarily be treated in the same way as a player who responds more positively. On the contrary, it is considered appropriate to adapt and target the interventions as much as possible to the individual player.

The obligation is not necessarily fulfilled simply because the licence holder has used its normal intervention procedures.

In continuation of individualised communication to a player caused by the player's specific gambling behaviour, the licence holder must follow up on whether the individual player reacts and responds desirably to the initiative.

The licence holder cannot meaningfully say to have taken measures to prevent problematic gambling behaviour and gambling addiction if they know or should know that the communication form towards the player does not contribute to a change in gambling pattern, but instead, the player still shows signs of a gambling behaviour that indicates a harmful consumption of gambling, problematic gambling or gambling addiction.

A player's desire not to be contacted or disturbed does not relieve the licence holder of the obligation to prevent problem gambling. The obligation does not lapse because the player considers themselves fine and declines further contact.

A player's rejection of concrete signs of problematic gambling behaviour must not automatically be accepted by the licence holder as the truth. A player who is negatively affected by gambling may find it difficult to acknowledge their problems. A player may also experience gambling urges to such an extent that they refuse to have a problem for fear of being excluded from gambling.

6.2.2.1 Which interventions to choose?

Self-imposed restrictions, such as deposit limits set by the player themselves, are usually preferable to forced exclusion. If a licence holder takes immediate action to close the player's gambling account without having done anything else, the player will simply be able to continue gambling with another operator. Instead, the licence holder can limit the player's spending in other ways, e.g. by setting a deposit limit, placing restrictions on the player's time consumption, excluding the player from certain types of games, etc.

6.2.2.2 Bonus offers and marketing

In the context of responsible gambling, the licence holder shall exercise particular caution when distributing bonus offers and using other sales promotion.

Bonuses may not be awarded based on a player's inactivity. This is stated in section 23(2) of the Executive Order on Online Betting, section 23(2) of the Executive Order on Land-based Betting and section 30(2) of the Executive Order on Online Casino. At the same time, the licence holder's attention should be sharpened if a player requests to have bonuses paid out, as this may be an indication that the player shows an urge to gamble but cannot afford it.

It is the Danish Gambling Authority's assessment that it is not in accordance with the requirement in the executive orders that the licence holder must take measures to prevent the player from developing problematic gambling behaviour and gambling addiction, if the player is encouraged to increase consumption through, among other things, bonus and VIP offers, while showing signs of problematic gambling behaviour. It also does not harmonise with the purpose clause in section 1 of the Danish Gambling Act, including in particular that the

spending on gambling must be kept at a moderate level and that players must be protected from developing gambling addiction.

For more information about marketing and bonus offers, please refer to the Danish Gambling Authority's guide on sales promotion, which is available on the Danish Gambling Authority's website.

Internal rules and procedures

7

7.1 Internal rules and procedures

Section 22(2) of the Executive Order on Online Casino
 Section 16(2) of the Executive Order on Online Betting
 Section 16(2) of the Executive Order on Land-based Betting

The licence holder shall have written internal rules and procedures on responsible gambling to prevent problem gambling and gambling addiction, including control and communication procedures with players exhibiting problem gambling behaviour, duty of attention and record keeping, storage of information on players' gambling behaviour and risk assessment of players. It is essential that the internal rules and procedures provide an operational tool for the licence holder and its employees to prevent problem gambling and gambling addiction.

7.1.1.1 What should the internal rules and procedures contain?

The licence holder's written internal rules and procedures on responsible gambling shall contain information on how the licence holder identifies problem gamblers and what actions and measures - both general and targeted - are taken to prevent problem gambling and gambling addiction. The information must be adapted to the licence holder's products and customer segment.

The internal rules and procedures must contain a clear description of how a player is risk assessed in relation to responsible gambling, including a clear description of circumstances that contribute to a downward adjustment of the risk assessment. It is necessary to have several different player categories where the risk levels are graduated and where the individual player's situation is taken into account in order to make a proper risk assessment.

There must also be clear guidelines and description of the procedure for how the licence holder's employees should act when identifying players who exhibit problem gambling behaviour. For example, the procedures must contain clear information to employees about which interventions should be implemented and when, e.g. at a given risk level or if other circumstances, such as worrying statements from the player, require it.

Likewise, the procedures must contain a clear description of which tasks each employee (function) has in connection with the licence holder's overall procedure for compliance with the duty of attention as well as information that it must be noted if the player exhibits problematic gambling behaviour.

The internal rules and procedures must as a minimum contain:

Guidelines for

- how problem gambling and gambling addiction are prevented and avoided,
- employee actions when a player is identified as exhibiting problem gambling behaviour, including clear information on what interventions to initiate and when,
- the tasks of each employee function in relation to compliance with the duty of attention,
- obligation to register if a player exhibits problematic gambling behaviour,
- risk assessment of players, including what actions and measures are taken for the different risk assessments and what factors influence a downward adjustment of the risk assessment,
- categorisation of players for risk assessment purposes.

13. Examples of situations where employees need to react

The following is not an exhaustive list.

Employees must react if the player, for example

- mentions financial problems, mental illness, self-harm or suicide,
- suggests having a gambling problem,

- states that they cannot control their gambling,
- exhibits threatening behaviour,
- makes claims that the games are unfair,
- requests bonuses frequently and persistently
- expresses aggression or desperation when requesting a bonus,
- attempts to pressure employees to approve payouts, bonuses, changing deposit limits or cancelling payouts,
- complains about losses,
- exhibits impatience, is loud or irritable.

Increased attention from the licence holder

The licence holder must show increased attention to the player's specific language and tone, investigate gambling behaviour and contact the player if the player mentions words such as the following through contact with employees via chat, email or telephone:

- Suicide
- Compulsive gambling
- Gambling addiction
- Addicted
- Alone
- Lonely
- Divorce
- Debt
- House rent
- Interest
- Loan
- Help
- Bankruptcy
- Loss of control
- Lack of control
- Lost job

7.1.1.2 Storing information

Section 22(3) of the Executive Order on Online Casino
Section 16(3) of the Executive Order on Online Betting
Section 16(3) of the Executive Order on Land-based Betting

The licence holder must store the information about the player's gambling behaviour and risk assessment of the player for 5 years. It is up to the licence holder whether the internal rules and procedures should be described in a single document or in several different ones.

Employee training

8

8.1 Employee training

Section 22(4) and (5) of the Executive Order on Online Casino
Section 16(4) and (5) of the Executive Order on Online Betting
Section 16(4) and (5) of the Executive Order on Land-based Betting

The licence holder shall have training and instruction programmes for relevant employees in order to prevent problem gambling and gambling addiction.

As the rules on training material are described in executive orders issued pursuant to the Danish Gambling Act, the Danish Gambling Authority interprets the provisions on training material to mean that the training material must be targeted at the Danish market. It is therefore important that the training material takes into account the Danish gambling legislation and includes the special tools regulated by the legislation.

14. Examples of what the training material should contain information about

- The Danish Gambling Authority's self-exclusion tool: ROFUS
- The Danish Gambling Authority's helpline on gambling addiction: StopSpillet
- Deposit limits
- The licence holder's own self-exclusion option

Please note that this is not an exhaustive list.

It is important that the training material is self-contained and not just part of the licence holder's internal rules and procedures. However, the material can refer to the internal rules and procedures to the extent relevant and necessary. Thus, the training material must be meaningful and instructive so that employees have an operational tool to prevent problem gambling and gambling addiction.

Thus, it is not necessary for the licence holder to train all employees in the prevention of problem gambling and gambling addiction. It will not be necessary to train and instruct staff, whose duties have no relation to players and gambling behaviour.

However, the licence holder shall ensure that the employees involved in player contact or player behaviour analysis are familiar with and apply the internal rules for their function.

It is therefore a requirement that all employees who have contact with players or are in any way involved in the analysis of player behaviour are made aware of and apply the internal responsible gambling rules and procedures.

15. Example

All customer service employees of a gambling operator must be trained to apply the internal responsible gambling rules and procedures. They need to be able to recognize patterns, language and tone in dialogues that may indicate that a player is no longer using gambling as entertainment, but that gambling has started to stress the player instead.

The Danish Gambling Authority considers it good practice if the licence holder chooses to differentiate the training and instruction of employees depending on the function and degree of contact with players that each employee has.

ROFUS and the licence holder's self-exclusion option

9

9.1 Register of Voluntarily Excluded Players (ROFUS)

9.1.1 General information about ROFUS

The Register of Voluntarily Excluded Players (ROFUS) is a register of all players in Denmark who have voluntarily excluded themselves temporarily or permanently from gambling. When you are registered in ROFUS, you are excluded from playing online casino and betting online with gambling operators with a Danish gambling licence. A registration in ROFUS also means that the player is excluded from buying land-based betting products and it is not possible to access land-based casinos in Denmark. ROFUS does not cover other types of gambling and therefore a player can still play other types of games even if they have registered in ROFUS.

A registration in ROFUS also means that the player is exempt from receiving direct marketing from the licence holder.

ROFUS is administered and maintained by the Danish Gambling Authority. ROFUS works by a player voluntarily registering on ROFUS.nu if they wish to temporarily or permanently exclude themselves from gambling.

The player can register with one of the following options:

Options for registration in ROFUS:

Temporary exclusion

Lasts either 24 hours, 1 month, 3 months or 6 months.

Permanent exclusion

Permanent, unless the person requests the Danish Gambling Authority to be removed from the register. Removals can be completed at the earliest after 1 year + 7 days from the time of registration.

For example, ROFUS contains information about the civil registration numbers of the players listed in the register, the date and time of the exclusion and the end date of a temporary exclusion.

Temporary exclusions are automatically removed when the exclusion period has expired. The exclusion is automatically removed on the exact date and time that the temporary exclusion expires. It is not possible to remove a temporary exclusion prematurely and it is not possible to undo your registration.

A player who has requested a permanent exclusion may at any time, but no earlier than one year after the date of registration, request the Danish Gambling Authority to be removed from the register. This means that it is not possible to undo your permanent exclusion until at least one year has passed. The player can confirm the request for deletion at the earliest 7 days after the request, after which the removal from the register can be completed. If the player has not confirmed their request to be removed within 30 days, the request will be cancelled.

9.1.2 The licence holder must inform about the option to register in ROFUS

Section 25(1) of the Executive Order on Online Casino
Section 19(1) of the Executive Order on Online Betting
Section 19(1) of the Executive Order on Land-based Betting

A licence holder cannot register a player in ROFUS on behalf of the player, but the licence holder must inform about the option of registration in ROFUS. A licence holder offering online

casino and/or online betting must also provide access to registration on all platforms where gambling products are offered.

9.1.3 Requirement to consult ROFUS

Section 25(2-4) of the Executive Order on Online Casino
Section 19(2-4) of the Executive Order on Online Betting
Section 19(2-4) of the Executive Order on Land-based Betting

Annex 1 to the Executive Order on Online Casino, Executive Order on Online Betting and Executive Order on Land-based Betting: technical requirements for licence holder, section C, no. 3.

When creating a new gambling account or issuing a means of identification, the licence holder must consult the register to ensure that the player in question is not registered in ROFUS. If a player is registered in ROFUS, the creation of the gambling account/identification device must be rejected by the licence holder.

Every time a player logs in to their gambling account with a licence holder offering online casino or online betting, the licence holder must consult ROFUS and check that they are not registered in ROFUS. If a player is registered in ROFUS, the player must be denied access to gamble. In case of a permanent exclusion, the customer relationship must be terminated when the player attempts to log in to his/her gambling account or when the licence holder is otherwise informed that the player has been permanently excluded in ROFUS. In case of temporary exclusion, the customer relationship shall not be terminated, but the player shall be denied access to play for the duration of the temporary exclusion.

If the player is registered in ROFUS on or after 1 October 2023, ROFUS also includes betting in physical shops in Denmark. Before the player can purchase a land-based betting product, the licence holder must consult ROFUS to ensure that the player is not registered. If the player is registered in the register, betting products cannot be purchased. A temporary exclusion means that the player's means of identification cannot be used to place new bets during this period.

If the licence holder becomes aware that a player is registered in ROFUS as permanently excluded, the licence holder must close the player's means of identification, terminate the customer relationship and close an existing gambling account linked to the means of identification.

If the licence holder experiences challenges with consulting ROFUS, the licence holder is obligated to inform the Danish Gambling Authority as soon as possible. This follows from Annex 1 to the executive orders on online casino, online betting and land-based betting: technical requirements for licence holders, section C, no. 3.

9.1.4 Marketing

Section 25(5) of the Executive Order on Online Casino
Section 19(5) of the Executive Order on Online Betting
Section 19(5) of the Executive Order on Land-based Betting

A player registered in ROFUS on or after 1 January 2020 is excluded from receiving marketing from licence holders during the exclusion period. No earlier than 24 hours before a licence

holder sends out marketing, the licence holder shall consult the register to check if the player is registered in ROFUS.

Marketing means any form of commercial contact that the licence holder directs towards its players.

Push messages and notifications can be considered marketing covered by the obligation to consult ROFUS prior to sending. The assessment of whether it is marketing depends, among other things, on the textual content and the selection of the recipient.

9.1.5 Information about previous ROFUS registrations

As a general rule, a licence holder may not store information about a player's status in ROFUS for later use.

ROFUS is a service for citizens who wish to block their option to create a gambling account, log into an existing gambling account and receive direct marketing from online casino, online betting, land-based betting and land-based casino operators.

It is crucial that the citizen finds that the personal data in ROFUS is processed confidentially, otherwise the system risks losing its credibility. The Danish Gambling Authority experiences that many citizens are concerned about the consequences of a ROFUS registration after its expiration.

If a licence holder uses information about a player's previous registration in ROFUS to discriminate against the player, there is a risk that the player will not make use of ROFUS later, even though the player may need it.

Therefore, the Danish Gambling Authority does not allow the use of information about a citizen's previous ROFUS registration when assigning risk scores in relation to responsible gambling.

Furthermore, the Danish Gambling Authority considers it good practice that the licence holder only stores and uses information about players' status in ROFUS in these two situations:

- In relation to sending marketing to existing customers, where it is directly stated in the individual executive orders that ROFUS can be consulted for up to 24 hours before the marketing is sent. In this situation, the licence holder can therefore store and use information from ROFUS that is up to 24 hours old.
- In addition, it is okay to store logs of completed ROFUS calls in order to document that the licence holder has fulfilled their obligations. This log should not be used for anything else.

9.2 Licence holder's self-exclusion option

Section 23(1-4) of the Executive Order on Online Casino
Section 17(1-4) of the Executive Order on Online Betting
Section 17(1-4) of the Executive Order on Land-based Betting

The licence holder shall provide the player with a tool that allows the player to request a temporary or permanent exclusion from the licence holder's games. The licence holder shall ensure that the player cannot enter into new games after the player has requested exclusion.

The self-exclusion feature must work in such a way that the self-exclusion takes effect immediately to ensure that the player cannot enter new games after the player has requested

exclusion. A function where the player has to contact the licence holder, e.g. via email, will therefore not be sufficient, as the exclusion will not take effect immediately after the request and the player has the opportunity to enter new games until the request is processed.

The player must be given the opportunity to exclude themselves:

Short term

Break of 24 hours (cooling off period). The player's gambling account must be deactivated during the period.

Temporary

Exclusion of minimum 30 days. The player's gambling account must be deactivated during the period.

Permanent

Exclusion, which closes the player's gambling account and terminates the customer relationship.

Deactivation of the gambling account shall not prevent the player from withdrawing any funds on deposit.

Since the short-term break is defined as 24 hours, it must not be possible to exclude yourself for less than 24 hours. Likewise, it must not be possible to exclude yourself for a period of time between 24 hours and 30 days, as a temporary exclusion must be a minimum of 30 days. For example, offering a temporary exclusion of 7 days would be in violation of the executive orders. On the other hand, there may be an option for the player to choose a temporary exclusion lasting more than 30 days. It is also allowed to offer various tools to help players plan their gambling, such as only playing a certain number of hours per day or only playing at certain times.

The rules on the duration of self-exclusion periods are set to prevent players from choosing self-exclusion periods that are too short to break a (potentially) negative gambling pattern.

In the event of a permanent exclusion, as mentioned above, the gambling account must be closed, and the customer relationship must be terminated. Especially for land-based betting, this means that the licence holder must also close the player's means of identification. At the earliest 1 year after the gambling account closure, the player may be registered as a new customer again. The licence holder must therefore store the information that a player has been excluded to ensure that the player cannot register as a new customer after a short time. The registration of the player's exclusion should be done via the player's civil registration number or similar to ensure that the player cannot create a new account, for example by providing a different email address than the one they were previously registered with. The exclusion applies to all games per domain.

A licence holder is allowed to set its own rules that a longer period than 1 year must pass before a player who has permanently self-excluded can re-register as a customer.

The licence holder shall immediately inform a player who has excluded himself/herself from the licence holder's gambling about the opportunity of counselling and treatment for gambling addiction at a Danish treatment centre. It should be noted that the nearest Danish treatment centre to the player's address can be referred to.

9.2.1 Additional restrictions

Some licence holders offer additional gambling restrictions beyond those required by gambling legislation, such as time limits or gambling restrictions in addition to self-exclusion.

It is allowed to offer these additional aids to players, as long as the additional offers do not replace the statutory restrictions.

If the licence holder chooses to provide these additional mitigation options, the licence holder must make it very clear what is being offered so that there is no doubt about this.

**Section 32 and 34(1) of
the Gambling Act**

10

10.1 Terms and conditions in the licence

Section 32 of the Gambling Act

Terms and conditions may be set in licences for the provision of betting and operation of online casino. These terms may relate to responsible gambling. Licence holders should therefore be aware that they may also have obligations under the terms of their licences.

10.2 Age limit for participation in gambling activities

Section 34(1) of the Gambling Act

Acceptance of stakes from persons under the age of 18 and other facilitation of such persons' participation in gambling is not permitted.

The licence holder must therefore ensure that it is not possible for young people under the age of 18 to gamble via an online gambling account or with a playerID created in another person's name.

Responses in case of non-compliance with ob- ligations

11

11.1 Responses in case of non-compliance with obligations

If the Danish Gambling Authority assesses that a licence holder does not meet the requirements of the provisions supervised by the Danish Gambling Authority, this may result in a response from the Danish Gambling Authority. Read more about the different types of responses that the Danish Gambling Authority can issue on the Danish Gambling Authority's website under *Compliance assessment and responses*.

Offering gambling in Greenland

12

12.1 Provision of gambling in Greenland

If a licence holder offers gambling in Greenland, the licence holder must be aware that some specific rules apply to the Greenlandic provision of gambling products and services.

For the provision of gambling in Greenland, the provisions of the following executive orders apply, which are issued pursuant to sections 17(2), 19(1) and 46(1) of the Act on Certain Games in Greenland, cf. Consolidation Act no. 336 of 7 April 2016.

1. Executive Order no. 683 of 11 June 2025 for Greenland on Online Casino.
2. Executive Order no. 685 of 11 June 2025 for Greenland on Online Betting.
3. Executive Order no. 687 of 11 June 2025 for Greenland on Land-based Betting.

12.1.1 Supplement to section 3.1.1

Section 15(1-4) of the Executive Order for Greenland on Online Casino
Section 13(1-4) of the Executive Order for Greenland on Online Betting
Section 14(1) and (2) of the Executive Order for Greenland on Land-based Betting

The information that must appear on the licence holder's website, user interface or at the point of sale must be communicated in both Danish and Greenlandic, and contact addresses of Greenlandic treatment centres for gambling addiction must be provided.

12.1.2 Supplement to section 3.2

Section 14 of the Executive Order for Greenland on Online Casino
Section 12 of the Executive Order for Greenland on Online Betting
Section 13 of the Executive Order for Greenland on Land-based Betting

All information that the licence holder is obliged to make available to the player must be in both Danish and Greenlandic when the licence holder offers gambling products and services in Greenland. However, the Danish Gambling Authority has currently chosen to exempt from the requirement so that only information of a permanent nature (as opposed to information that changes continuously) must be available in Greenlandic.

12.1.3 Supplement to section 9.2

Section 23(4) of the Executive Order for Greenland on Online Casino
Section 17(4) of the Executive Order on Online Betting
Section 17(4) of the Executive Order for Greenland on Land-based Betting

If the player is a customer from Greenland, the licence holder must inform about counseling and treatment options for gambling addiction at a Greenlandic treatment centre. The information must be provided to the player regardless of whether the player has self-excluded briefly, temporarily or permanently.

