

Spillemyndigheden's Certification Programme Inspection Standards for Online Casino

SCP.02.03.EN.1.2

**Spillemyndigheden's Certification Programme
Inspection Standards for Online Casino**

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1 Objectives of the inspection standards

The inspection standards for online casino are set out to ensure that the gambling system features functionality that supports a number of significant considerations in the Act on Gambling by putting in place requirements for the processing of customer information, managing customer funds, the presentation and execution of the games as well as the logging of gambling and other transactions.

In relation to the supervision by Spillemyndigheden of the gambling being offered by the licence holder several requirements are set out in Annex 1 to the executive order no. 67 of 25 January 2012 on online casino covers how the licence holder transmits data to the automated supervision system of Spillemyndigheden. For this reason, the certification programme does not contain requirements concerning data transmission as these are regulated by the executive order.

1.1 Scope of this document

This document contains the requirements specifying how testing organisations obtain accreditation for conducting certification of the gambling system, business processes and business systems of the licence holder as well as instructions on how to conduct the certification. The requirements concerning accreditation of the testing organisation and certification of the licence holder can be found in section 2 “certification”.

The gambling system of the licence holder shall include functionality concerning gambling accounts including functions related to the general terms and conditions, management of gambling accounts, responsible gambling, funds and transactions as well as various reports. This functionality is described in section 3 “Gambling accounts”.

The gambling system shall also include several general gambling functions related to game execution, visual presentation as well as instructions and game rules. This functionality is described in section 4 “General gambling functionality”.

Furthermore, several special gambling functions apply to online casino, peer-to-peer games and online bingo. These functions are described in section 5 “Special gambling functionality”.

Finally, the gambling system shall include functions for managing the gambling functionality including functions for activating and deactivating games, incomplete games, malfunctions, the course of the game as well as records, logs and data retention. This functionality is described in section 6 “Management”.

1.2 Version

Spillemyndigheden will continuously revise the certification programme and the latest version will at all times be accessible at Spillemyndigheden's website.

Date	Version	Description
2014.07.04	1.0	A new document structure than the previous version 1.3 alongside with a range of updates in different areas. A new version 1.0 is therefore published. It is the intention to follow normal versioning for future changes.
2018.01.01	1.1	Changes completed because of liberalization of online bingo, betting on horse- and dog races and betting on pigeon races.

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		<p>The following requirements has been adjusted or deleted because of changes to the Gambling Act and AML legislation: 3.2.1.1, 3.2.2.3, 3.2.2.4, 3.4.2.1, 3.4.3.1, 3.4.4.1, 3.5.1.2 and 3.5.1.3</p> <p>Adjustments have also been made to guidance text's throughout the inspection standards.</p>
2020.01.01	1.2	<p>Changes made due to changes in the executive order on online casino regarding responsible gambling. In addition to this a few requirements have been reworded and some requirements moved to place them in the correct context.</p> <p>Spillemyndigheden has removed the requirement saying the ATO's accreditation must refer to a specific version cf. section 2.2.</p>

Spillemyndigheden will publish guidelines regarding the validation of existing certifications together with previously performed inspections and tests, when new versions of the certification programme is released.

It is important to emphasise that only the Danish version is legally binding and that the English version holds the status of guidance only.

1.3 Applicability

Inspection Standards for Online Casino are applicable for offering of:

- Online casino (§18 in the Danish Gambling Act)

For online bingo offered via television the following requirements does not apply:

- Section 3 – 3.1.1.9, 3.2.2.5, 3.2.3, 3.2.4.1, 3.2.4.2, 3.2.5, 3.3.1.4, 3.3.2.2-3.3.2.5, 3.3.2.8-3.3.2.10, 3.4, 3.5.
- Section 4 – 4.1.1.2, 4.1.2.5, 4.1.2.10-4.1.2.11, 4.1.2.13, 4.2.1-4.2.2, 4.2.4, 4.2.6-4.2.11.
- Section 5 – 5.1-5.2, 5.3.3.
- Section 6 – 6.1.1-6.1.2, 6.1.3.3-6.1.3.4, 6.1.4, 6.1.5.1-6.1.5.7.

1.3.1 Specifically regarding offer of online bingo via television

Requirements for online bingo are also applicable to online bingo offered via television. If the license holder does not use a gambling system for offering online bingo via television, the requirements shall be interpreted in the sense that “gambling system” also covers a license holder’s manual procedures. This means that the license holder does not necessarily need to have a system, which automatically handles the requirements, but the license holder must have procedures in place to support the requirement and shall continuously document that the procedures are followed.

2 Certification

2.1 Certification frequency

The licence holder is responsible to ensure to be certified in accordance with the requirements in this document with an interval of maximum of 12 months.

2.1.1 Initial certification

The licence holder must, as a rule, be certified before a licence to offer games can be issued, unless Spillemyndigheden has informed otherwise.

2.1.2 Renewed certification

The licence holder must, as a rule, have completed a new certification within 12 months of the latest certification. The standard report must reflect, when the certification has been renewed.

The licence holder can choose to postpone the certification up to two months from the time where a new certification should have been completed. The new certification must be finalised no later than 14 months after the latest certification and the standard report must be submitted to Spillemyndigheden within the same deadline. Use of this postponement requires that the testing is commenced within 12 months of the latest certification.

Spillemyndigheden must be notified before the certification is postponed.

The deadline for renewal of certification is shortened with the equally amount of time the former 12- month deadline has been postponed. Meaning that if you for instance make use of the maximum two months postponement, then the next certification is due 10 months later. The time for the next certification shall be reflected in the standard report. A renewal of the certification may be based on sampling, spot checks and compliance with the requirements set out in the document "SCP06.00.DK - Change Management Programme". The certification shall clearly state whether this method has been used.

2.2 Accredited testing organisations

Testing organisations shall attain ISO/IEC 17020 accreditation and/or ISO/IEC 17025 accreditation based on the criteria described in the following sections. 'Spillemyndigheden's certification programme – SCP.02.03.DK' must appear from the accreditation scope.

The accreditation will be undertaken by DANAK, the Danish Accreditation Fund, or a similar accreditation body being covered by the multilateral agreement on reciprocal recognition of the European Co-operation for Accreditation or a member of the International Laboratory Accreditation Cooperation.

To ensure that the necessary qualifications are in place during the certification the testing organisation and their staff shall fulfil the following requirements. Documentation that the requirements are fulfilled shall be enclosed with the certification.

2.2.1 Requirements for accredited testing organisations

The accrediting testing organisation:

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- a) Shall have at least three years' experience in inspecting gambling systems or a similar closely related subject area,
- b) Shall work on the basis of the ISO/IEC 17020 accreditation and/or ISO/IEC 17025 accreditation, which refers to the requirements of SCP.02.03.DK, and
- c) Shall ensure that staff with sufficient qualifications will carry through the certification.

2.2.2 Requirements for personnel at the accredited testing organisations

The certification shall be carried out by staff with sufficient qualifications cf. sections 2.2.1. Work done in relation to the certification shall be supervised and the declaration of certification shall be attested by one or more persons who warrant(s) that the work has been carried out to adequate professional standards. These persons shall meet the following requirements:

- a) shall have a relevant education background or in other ways prove relevant qualifications,
- b) Shall be certified as:
 - International Information Systems Security Certification Consortium (ISC)2 Certified Information Systems Security Professional (CISSP),
 - Payment Card Industry (PCI) Qualified Security Assessor (QSA), or
 - Information Systems Audit and Control Association (ISACA) Certified Information Systems Auditor (CISA).
- c) The supervisor referred to in a) or b) above shall have five years of professional experience in inspecting gambling systems or a similar closely related subject area.

Guidance: Certification and attestation can be carried out by staff who in conjunction fulfil the requirements.

3 Gambling accounts

3.1 General

3.1.1 General terms and conditions of the licence holder

1	The gambling system shall require customers to accept the terms and conditions of the licence holder upon registration.
2	The gambling system may only allow the customer to play for money when he or she has accepted the terms and conditions of the licence holder. The gambling system shall record this action in a log.
3	It shall be stated in the licence holder's terms and conditions that the customer is entering into a contract with the licence holder.
4	It shall be stated in the licence holder's terms and conditions that a Danish licence is only valid in Denmark (and possibly Greenland).
5	It shall be stated in the licence holder's terms and conditions that the customer is giving the licence holder consent to obtain information for verification of the customer's identity.
6	It shall be stated in the licence holder's terms and conditions that persons below the age of 18 are not allowed to participate in the games, that the customer is only permitted to act on his or her own behalf and how the licence holder's rules are being enforced.

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7	It shall be stated in the licence holder's terms and conditions how customer complaints are dealt with.
8	It shall be stated in the licence holder's terms and conditions how sensitive personal information is handled.
9	It shall be stated in the licence holder's terms and conditions how funds in gambling accounts which are no longer being used are handled, including: <ul style="list-style-type: none"> • passive gambling accounts • suspended gambling accounts • gambling accounts of self-excluded players • gambling accounts with unfinished games
10	It shall be stated in the licence holder's terms and conditions how the customer may exclude him- or herself and impose deposit limits.
11	It shall be stated in the licence holder's terms and conditions that it is not possible to play on credit.
12	It shall be stated in the licence holder's terms and conditions how violations of the licence holder's rules are handled.

3.1.2 Licence, supervision and labelling scheme

1	It must appear from the homepage of the licence holder's website or user interface that the licence holder holds a licence from and is subject to supervision by Spillemyndigheden.
2	Spillemyndigheden's label must be placed on the licence holder's website or user interface.
3	Spillemyndigheden's label must be placed on the homepage of the licence holder's website.
4	On other pages besides the homepage of the licence holder's website Spillemyndigheden's label must be easily visible for the player.

3.1.3 Complaints

1	Complaints from players shall be registered in a log, containing information about: <ul style="list-style-type: none"> • The reason for the complaint • Player identification • Time and date • Casework time and • Result (accepted/partly accepted/rejected). <p>Guidance: A complaint is when a player doesn't agree with the licence holder's casework time or the result hereof. A complaint can start out by being an enquiry from a customer, who after having discussed the issue with the licence holder and still doesn't agree with the casework time or the result hereof.</p>
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3.2 Management of gambling accounts

3.2.1 Customer registration

1	During the registration process, the gambling system shall collect and save the following information about the customer:
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	<ul style="list-style-type: none"> • full name • address • civil reg. no. (CPR) • country of residence <p>Guidance: For the period between customer registration and customer verification cf. section 3.2.2 the licence holder can allow the customer to gamble from a temporary gambling account.</p> <p>Guidance: If the customer does not have a civil reg. no., the gambling system should receive an ID number from a document issued by the home country of the customer which will constitute identification (e.g. driving licence, passport or the like).</p> <p>Guidance: If the customer does not have a civil reg. no., the customer's date of birth shall be recorded and saved.</p>
2	<p>The gambling system shall ensure that the customer is 18 years of age or older.</p> <p>Guidance: The gambling system shall not apply temporal data from the customer's unit to calculate the age.</p>
3	<p>The gambling system shall register the time of receipt of the identification data. This information shall only be accessible for authorised users.</p>
4	<p>The gambling system shall confirm that the customer is not registered in Spillemyndigheden's Register of Self-excluded Persons (ROFUS).</p>
5	<p>The gambling system shall save information about the customer's status obtained from the Register of Self-excluded Persons (ROFUS).</p> <p>Guidance: If the register is unavailable, the gambling system shall save information about the attempt to confirm the customer's status, including the date and time of the attempt.</p>
6	<p>The gambling system shall make an encrypted connection (such as SSL) available for the transfer for the customer's registration data using the internet.</p> <p>Guidance: Player registration is done using an internet connection, but for online bingo offered via television the registration can be done over the phone, and in this situation the requirement for encryption does not apply.</p>

3.2.2 Customer verification process

1	<p>The gambling system shall be able to save the following documentation of the customer verification:</p> <ul style="list-style-type: none"> • full name • address • civil reg. no. (CPR) • country of residence <p>Guidance: If the customer does not have a civil reg. no., the gambling system shall store a copy of a document issued by the home country of the customer which will constitute proof of identity (e.g. driving licence, passport or the like).</p>
2	<p>If a third party carries out the customer identification process, documentation shall be saved so that there will be a clear audit trail to the documentation applied by the third party for the</p>

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	customer identification.
3	If the customer identification process has not taken place within one month of set-up, the temporary gambling account shall be closed.
4	The gambling system shall make an encrypted connection (such as SSL) available for the transfer for the customer identification data.
5	Information about winnings withheld from customers, as a consequence of closing a temporary gambling account, shall be registered in a log

3.2.3 Customer access

1	<p>The customer's access to the gambling account shall be authorised by means of a digital signature with a security level corresponding to the OCES standard or higher, and the licence holder shall verify that the digital signature applied belongs to the customer in question.</p> <p>The customer's access to the gambling account on a technical platform, which does not support a digital signature with a security level corresponding to the OCES standard or higher, shall be authorized by means of a secure login approved by Spillemyndigheden. The customer's access to the gambling account shall previously have been authorised by means of a digital signature with a security level corresponding to the OCES standard or higher on a supported technical platform.</p> <p>The customer's access to the gambling account from Greenland shall be authorised by means of a secure login approved by Spillemyndigheden.</p> <p>The access of customers who do not have a civil reg. no. to their gambling accounts shall be authorised by means of a secure login.</p>
2	Upon each login, the gambling system shall confirm that the customer is not registered in Spillemyndigheden's Register of Self-excluded Persons (ROFUS) before allowing the customer to play.
3	<p>The gambling system shall save information about the customer's status obtained from the Register of Self-excluded Persons (ROFUS).</p> <p>Guidance: If ROFUS is unavailable, the system shall save information about the attempt to confirm the customer's status, including the date and time of the attempt.</p>
4	In connection with the customer's log-in, the gambling system shall show the date and time of the previous log-in session.
5	The customer protection information shall contain or link to information about the importance of the customer keeping his or her gambling account and login data secret.
6	The customer protection information shall contain or link to information about how customers can detect unauthorised use of their gambling accounts.

3.2.4 Changes to customer data

1	<p>The gambling system shall limit the ways in which a customer who does not have a civil reg. no. is able to recreate and change the password to his or her gambling account to:</p> <ul style="list-style-type: none"> • authorised personnel and • through known communication channels such as the customer's registered email address, telephone number or the like.
2	The gambling system shall record and save information on password changes as described in

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	3.2.4.1.
3	The gambling system shall save changes in customer details in an auditable log.
4	The gambling system shall be able to save documentation showing that changes to customer identification data are correct.
5	The gambling system shall make an encrypted connection (such as SSL) available for changes to the customer identification data.

3.2.5 Activation and deactivation

1	The gambling system shall make it possible for authorised personnel to activate and deactivate gambling accounts. Guidance: Authorised personnel means personnel who is authorised to activating and deactivating gambling accounts in accordance with their job description. This is in reference to item 3.1 in document SCP.03.00.EN Information for security Management System
2	The gambling system shall record it in a log each time a gambling account is deactivated, including information about the balance on the gambling account, the reason for deactivation as well as the name of the employee deactivating the account.
3	The gambling system shall be able to generate reports listing gambling accounts grouped by "activated" and "deactivated" status, balance, reasons and employee.
4	The gambling system shall deactivate gambling accounts for which the customer identification process has not been completed within one month.

3.3 Responsible gambling

3.3.1 Suspension

1	The gambling system shall provide means by which authorised personnel is able to suspend the access of a customer to the games.
2	The gambling system shall keep a list of suspended customers and the reasons for their suspensions.
3	Immediately after suspension as described in 3.3.1.1, the gambling system shall not be able to receive new stakes or deposits from the customer in question.
4	A suspension entails that the customer is unable to transfer funds to and from the gambling account.

3.3.2 Customer self-limitation

1	The gambling system shall provide options to customers whereby the customers can easily impose limits on their gambling.
2	The gambling system shall ensure, that the customer sets a deposit limit, before the customer can start playing. The customer shall at least set one of the following deposit limits: a. threshold amount for total daily deposits into the gambling account, b. threshold amount for total weekly deposits into the gambling account, or c. threshold amount for total monthly deposits into the gambling account. Guidance: Durations are measured in by the Danish calendar.

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3	<p>The amounts for deposit limits according to requirement 3.3.2.2 must not be predetermined.</p> <p>Guidance: The gambling system can offer the player to select between amount intervals. It is allowed to set an upper deposit limit.</p>
4	<p>As soon as the gambling system receives a request for a deposit limit from a customer in accordance with requirement 3.3.2.2, the limit shall be implemented for all future gambling activities.</p> <p>Guidance: An exception to this requirement, is the situation where the player request a higher deposit limit cf. req. 3.3.2.5.</p> <p>Guidance: The new deposit limit may be implemented upon the customer's next log-in, if the customer is logged out of the gambling system in connection with changing the deposit limit.</p>
5	<p>When a customer requests to change to a higher deposit limit, the gambling system shall ensure, that the new deposit is not implemented at least until 24 hours later.</p>
6	<p>The gambling system shall provide the customer with a function to exclude him- or herself from playing.</p> <p>The customer shall at least have the option to choose:</p> <ol style="list-style-type: none"> a. brief break from playing (cool-off period) of 24 hours, b. exclusion for at least 30 days, and c. exclusion for an indefinite period. <p>Guidance: The function must be an automated process, which the player can activate. Contacting the licence holder's customer service is not an automated process and is therefore not sufficient.</p> <p>Guidance: Durations are measured in by the Danish calendar. Except for the cooling-off period of exactly 24 hours, self-exclusion periods must not be less than 30 days.</p>
7	<p>Immediately after reception of a request for self-exclusion cf. req. 3.3.2.6, the gambling system shall not be able to accept new stakes or deposits from the customer (unfinished games may be completed in accordance with the game rules). At the same time, the customer shall be informed about the possibility of receiving counselling and treatment for gambling addictions at a Danish treatment centre.</p>
8	<p>Self-imposed restrictions alone shall not prevent the customer from withdrawing funds from the gambling account (however, access to the funds may be restricted for other reasons, for example if an investigation is being conducted).</p>
9	<p>If the customer excludes him- or herself permanently from playing (i.e. without limiting the duration), the customer's gambling account shall be closed, and a new gambling account may not be set up for the same customer for at least one year.</p>
10	<p>Immediately after receipt of a request for permanent exclusion, the gambling system shall inform the customer that all released funds will be paid out from the gambling account.</p> <p>Guidance: The licensee must in this situation initiate the procedure for paying out all released funds, which can imply contacting the customer for confirmation of method for payout.</p>
11	<p>All functions of the gambling system related to self-exclusion (temporary and permanent) shall inform customers of the possibility of being registered in Spillemyndigheden's self-exclusion register (ROFUS), and link to the register.</p>

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3.3.3 Customer protection information

1	It must appear from the licence holder's website or user interface that it is unlawful for people below the age of 18 years to participate in gambling.
2	The licence holder's website or user interface shall provide Information about responsible gambling and the potential harmful effects of gambling.
3	The licence holder's website or user interface shall provide a link to a gambling addiction self-test.
4	The licence holder's website or user interface shall provide information about and addresses for Danish treatment centres.
5	The licence holder's website or user interface shall provide information about the possibility to register in Spillemyndigheden's self-exclusion register (ROFUS) and link to the register.
6	The licence holder's website or user interface shall provide information about Spillemyndigheden's helpline for responsible gambling.
7	The licence holder's website or user interface shall link to a recognised filtering software or other programs that allow customers to configure their computers to prevent access to online gambling sites.
8	The licence holder's website or user interface shall provide information about or link to the terms and conditions applicable to the customers.
9	The information mentioned in requirements in this section shall be given a prominent position on the licence holder's website or user interface, and it shall be accessible from all pages.

3.4 Funds and transactions

3.4.1 Currencies

1	The gambling system shall handle exchange rates in an unambiguous, automatic and systematic manner.
2	The customer shall have access to information about the currencies accepted by the gambling system as well as the procedure for currency conversion.

3.4.2 Deposits

1	<p>The gambling system shall inform the customer clearly and specifically of all restrictions regarding deposits and access to funds in connection with deposits.</p> <p>Guidance: If there is a lag between the deposit and the availability of the funds which causes a delay in the customer's access to the funds, the customer shall be informed clearly and specifically about this before the deposit is made.</p>
2	<p>When the customer is depositing funds, the gambling system shall provide unambiguous information about all fees.</p> <p>Guidance: If a fee is charged in connection with a deposit or a related withdrawal and/or release of funds, the customer shall be informed clearly and specifically of this before the deposit is made into the account.</p>
3	The gambling system shall only accept deposits of up to DKK 10,000 (or a corresponding amount in another currency) for temporary gambling accounts.

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	Guidance: This limit is a cumulative sum of all deposits made by the customer.
4	The gambling system shall only be capable of receiving deposits into a gambling account from a payment service provider which is operating legally in Denmark.
5	The gambling system shall credit the gambling account immediately after receipt of the customer's deposit.
6	The gambling system shall have an auditable log which shows all amounts deposited. This log shall, as a minimum, include the following information: <ul style="list-style-type: none"> • date and time • payment channel • customer • amount • type of transaction (i.e. "deposit")
7	The gambling system shall be able to generate reports, which clearly show all deposited funds.
8	The gambling system shall be able to generate reports, which clearly show all amounts that have been deposited to the customer's accounts categorised by payment channel.
9	The gambling system shall be able to generate reports, which accurately show all rejected attempts to deposit funds.

3.4.3 Withdrawals

1	The gambling system shall only be capable of withdrawing funds from gambling accounts for which customer identification has taken place. Guidance: Withdrawals shall not be made from temporary gambling accounts but remaining deposited funds may be returned.
2	The gambling system may not allow a withdrawal which will result in the customer's account balance becoming negative.
3	The gambling system shall allow customers to withdraw all released funds. Guidance: This does not limit the licence holder's possibility for performing controls on withdrawal frequencies, identity, etc.
4	The gambling system shall inform the customer clearly and specifically of all restrictions regarding withdrawals and access to funds in connection with withdrawals. Guidance: If there is a lag between the withdrawal and the availability of the funds which causes a delay in the customer's access to the funds, the customer shall be informed clearly and specifically about this before the withdrawal is made.
5	When the customer is withdrawing funds, the gambling system shall provide clear and specific information about all fees. Guidance: If a fee is charged in connection with a deposit or a related withdrawal and/or release of funds, the customer shall be explicitly informed of this before the withdrawal request.
6	The gambling system shall have an auditable log which shows all amounts withdrawn. As a minimum, the log shall contain information about the following: <ul style="list-style-type: none"> • date and time • payment channel • customer

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	<ul style="list-style-type: none"> • amount • type of transaction (i.e. "withdrawal")
7	The gambling system shall be able to generate reports, which clearly show all withdrawn funds.
8	The gambling system shall be able to generate reports, which clearly show all amounts that have been withdrawn from the customer's accounts categorised by payment channel.
9	The gambling system shall be able to generate reports, which accurately show all rejected attempts to withdrawal funds.

3.4.4 Other customer transactions

1	The gambling system shall not allow transfers of funds, etc. between gambling accounts.
2	The gambling system shall debit the customer's gambling account immediately after a stake is placed in a game.
3	The gambling system shall not allow a stake to be placed in a game that could result in the customer's account balance becoming negative.
4	The gambling system shall credit all winnings to the gambling account immediately. Guidance: Winnings may be withheld for further results checks, etc.
5	The gambling system shall keep a log of all transfers between gambling accounts and the individual games.
6	The gambling system shall be able to generate reports which accurately show transfers of funds to and from games.

3.4.5 Adjustments, bonuses, etc.

1	The gambling system shall give clear and specific information to customers as to the reasons for any adjustments, bonuses, etc. made on gambling accounts. Guidance: This may be "upon request".
2	The gambling system shall give clear and specific information to customers as to the terms, conditions and limitations applicable in connection with any adjustments, bonuses, etc. made on gambling accounts.
3	The gambling system shall have an auditable log which shows all adjustments, bonuses, etc. made on gambling accounts.
4	The gambling system shall be able to generate reports which accurately show all adjustments, bonuses, etc. made on gambling accounts.

3.4.6 Account statement etc.

1	As a minimum, the gambling system shall give the customer access to information about the balance on the gambling account, gambling history (including stakes, winnings and losses), deposits, withdrawals and other related transactions. The information shall be available to the player in the gambling account for at least 90 days.
2	At the customer's request, the licence holder shall be able to provide account statements showing all transactions on the gambling account. Guidance: The process of generating this account statement and make it available to the customer can be a manual process.

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3	The customer must have access to guiding text about transactions in the customer's gambling account.
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3.5 Reports

3.5.1 General

1	Together, the reports described in 3.4.2.7, 3.4.2.8, 3.4.2.9, 3.4.3.7, 3.4.3.8, 3.4.3.9, 3.4.4.6 and 3.4.5.4 shall be able to form a complete picture of all financial transactions and customer receivables.
2	The gambling system shall be capable of analysing passive gambling accounts and use this as a basis for generating reports.
3	The gambling system shall be capable of analysing inactive gambling accounts and use this as a basis for generating reports.
4	The gambling system shall be able to generate reports identifying gambling accounts that have been closed for more than five working days with a positive balance.
5	The gambling system shall be able to generate reports of all customer registrations (complete or incomplete).
6	The gambling system shall be able to generate reports of all registered customers, their account information (including inactive and deactivated gambling accounts) and date of registration.
7	The gambling system shall be able to generate reports of all suspended and/or self-excluded customers.
8	The gambling system shall be able to generate reports listing all customers with gambling limits.
9	The gambling system shall be able to generate reports of all closed gambling accounts within a given financial year (including the reason the account was closed).
10	<p>The gambling system shall be able to generate reports for each gambling account if required.</p> <p>Guidance: The reports may be generated by providing information on:</p> <ul style="list-style-type: none"> • deposits, • stakes, • winnings, • withdrawals and • funds that have been inactive for more than 90 days

4 General gambling functionality

4.1 Game execution

4.1.1 General

1	<p>The gambling system shall only allow customers to participate in games and events covered by the Gambling Act.</p> <p>Guidance: The Act and its associated executive orders details what games and events the licence holder is allowed to use for offering gambling.</p>
2	The gambling system shall only permit participation in games by a gambling account when the customer verification process has been correctly completed.

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	Guidance: This does not exclude participation in games from temporary gambling accounts.
3	In games with interactive gambling options (e.g. roulette, blackjack, etc.), the illustrations shall unambiguously show the type and value of all stakes and allow changing and resetting stakes.
4	The gambling system shall ensure a minimum value of at least three seconds for each game cycle. Guidance: Game cycle is to be interpreted, as the time from the beginning of a game, until the result is presented to the customer both events included. E.g. in poker it would be from the cards being dealt, until the show down. Guidance: When using "Auto play" functionality there shall be at least three seconds between each result.
5	The gambling system shall ensure that participation in all games is subject to informed consent. Guidance: It is not permitted to force customers to participate in a game just by selecting it (customers cannot be forced to play).
6	The gambling system shall ensure that all instructions derived from the customer's actions are based on informed consent. Guidance: Actions where the customer "clicks" on action images such as "play", "hold", "draw", "double", etc. only apply when the customer has had reasonable time to consider the consequences of his or her action (i.e. repeated clicks on an action button cannot be queued and executed later). Guidance: This does not exclude auto-games and similar functions.

4.1.2 Online bingo

1	The gambling system shall only allow online bingo with either 75, 80 or 90 numbers/symbols.
2	The gambling system shall ensure that for online bingo with 75 numbers/symbols the bingo card consists of 5 rows with 5 squares each.
3	The gambling system shall ensure that for online bingo with 80 numbers/symbols the bingo card consists of 4 rows with 4 squares each.
4	The gambling system shall ensure that for online bingo with 90 numbers/symbols the bingo card consists of 3 rows with 9 squares each.
5	The gambling system shall ensure that the sale of bingo cards does not start until 30 minutes before the game begins. Guidance: This does not apply for online bingo offered via television.
6	The gambling system shall generate the bingo cards randomly.
7	The gambling system shall not allow players to choose the numbers/symbols on the bingo cards. Guidance: This is not a hindrance to players selecting their bingo cards amongst a number of bingo cards generated randomly by the gambling system.
8	The gambling system shall not allow the player to change the numbers/symbols on a bingo card.
9	The gambling system shall allow the player to manually mark the drawn numbers/symbols on the bingo card.

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	<p>Guidance: The player must be able to mark the drawn numbers/symbols on the bingo cards themselves. Marking is also known as “dabbing”.</p> <p>Guidance: The player must be awarded their winnings, if the player's numbers/symbols have been drawn – also in situation where the player has marked the wrong numbers/symbols.</p>
10	The gambling system shall allow automatic marking (“dabbing”) of drawn numbers/symbols on the player's bingo card.
11	<p>The gambling system shall ensure a minimum value of at least three seconds between drawing each number/symbol.</p> <p>Guidance: This does not preclude that numbers/symbols are drawn all at once ahead of the visual presentation to the player, as long as numbers/symbols are visually presented individually with a minimum of three second interval. If all numbers/symbols are drawn all at once ahead of presentation of the first number, see 4.2.12.2.</p>
12	The gambling system must end the game when the first player has a fully marked bingo card.
13	<p>The gambling system shall ensure, that the customer has the opportunity to see all bingo cards, which were part of the game. It must clearly show, which bingo cards were awarded a prize.</p> <p>Guidance: The customer must be able to see, which bingo cards were part of the bingo game and which bingo cards were awarded a prize. The information can be available directly on the screen so it can be saved or printed or as a downloadable document e.g. directly after the game, as part of the customer account page or from a “result page”. The bingo cards do not need to be presented in the same visual way, as they were during the game, but can be reproduced in text.</p>

4.1.3 Online bingo offered via television

1	<p>The value of each prize must not be higher than 5.000 DKK.</p> <p>Guidance. This value also applies for jackpots.</p>
2	The total sale must not be more than 100.000 DKK per day.
3	A player's stakes must not be more than 175 DDK per day.
4	Return to player must not be more than 45 percent.

4.2 Visual presentation

4.2.1 General

1	The gambling system shall ensure that rules and instructions (including restrictions for games and how the customer plays) are readily available from all game pages related to the game.
2	<p>The gambling system shall ensure that the name of the game is shown on all pages related to the game.</p> <p>Guidance: The game name may be visible in the title bar of the window or the tab in which the game is running.</p>
3	The gambling system shall ensure that the balance of the gambling account is shown or readily accessible from all game pages.

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4	The gambling system shall show the customer the amount of the stake he or she is placing, including the game unit stake and the total stake.
5	If the result may be affected by factors outside the control of the player and/or if another participating customer is using automation (or add-on applications for automation), the gambling system shall inform the customer of this (or provide a link with the information).
6	The gambling system shall display a clock that allows the customer to see how much time he or she spends. The clock shall be visible for the customer at all times, and it shall not be based on the customer's equipment.

4.2.2 Game actions

1	The gambling system shall clearly display the bet denomination or currency of the game.
2	The gambling system shall clearly display the customer's possible stake, actual stake and, if relevant, a conversion from currency to bet denomination (in a manner that makes it easy to infer the rate of exchange).
3	The gambling system shall display all possible winnings and all possible combinations of winnings in a graphical manner.
4	The gambling system shall clearly display the maximum stake.
5	The gambling system shall clearly display the minimum stake to be placed in the game.

4.2.3 Outcomes

1	The gambling system shall display outcomes clearly and unambiguously.
2	The gambling system shall display the outcome of the game for an appropriate period of time.
3	The gambling system shall display winnings in a clear and specific manner.

4.2.4 Gaming machines

1	<p>The gambling system shall display all games in a clear and specific manner. Winnings for each symbol or combination of symbols shall be placed in an area visually related to the symbol. Moreover, the number of symbols resulting in a pay-out shall be shown.</p> <p>Guidance: If some symbols follow the same winnings scale, they should be placed in an area visually related to this winnings scale.</p> <p>Guidance: If winnings can be won for different combinations of symbols, the illustration shall clearly show the combination.</p>
2	The gambling system shall display the maximum stake, the number of credits it is possible to bet for each chosen line and the total number of possible lines available in a graphical manner.

4.2.5 Symbols

1	A symbol shall have the same shape and colour consistently throughout each game unless animations are used.
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4.2.6 Card games

1	The face sides of playing cards shall clearly show values and suits.
2	The gambling system shall graphically show the number of decks in use if more than one deck is

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	in use.
3	The rules of the card game shall state all instances where the cards are being shuffled.

4.2.7 Roulette

1	<p>If a game is being offered with the word "roulette" as a part of the name, the wheel shall have 36 pockets which are numbered from 1 to 36 and also one pocket marked 0 (37 pockets in total) and possibly one additional pocket marked 00 (38 pockets in total). The sequence of the numbers shall be identical to a standard roulette wheel.</p> <p>Guidance: The allowed roulette games are commonly referred to as “European roulette” (37 pockets) and “American roulette” (38 pockets).</p>
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4.2.8 Dice

1	Dice that are being shown as traditional dice shall have six sides that are numbered by one to six pips on each side, and the sum of opposite sides shall be seven. If the dice used are not traditional dice, this shall be clear to the customer, and the design of the die shall be described, for example in the game rules.
2	It shall be clear which side of the die decides the game.

4.2.9 Video poker

1	All versions of video poker shall have specific rules for all conceivable events and outcomes.
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4.2.10 Blackjack

1	All versions of blackjack shall have specific rules for all conceivable events and outcomes.
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4.2.11 Baccarat and punto banco

1	All versions of baccarat and punto banco shall have specific rules for all conceivable events and outcomes.
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4.2.12 Online bingo

1	The gambling system shall have a continuous display, which clearly shows all drawn numbers/symbols.
2	<p>The gambling system shall ensure a minimum value of three seconds between the individual visual presentations of each drawn number/symbol.</p> <p>Guidance: If numbers/symbols are drawn all at once ahead of the visual presentation to the player, the numbers/symbols must be presented with an interval of at least 3 seconds. If numbers/symbols are drawn simultaneously with the visual presentation, see 4.1.2.11.</p>

4.3 Instructions and game rules

4.3.1 General

1	All games shall have associated rules and instructions covering all aspects of the game.
2	The game rules (see 4.3.1.1) shall be true and fair and unambiguous.
3	The game rules shall be available to the customer through the same medium and on the same unit as that used for the actual game.
4	The game rules shall not change during the actual game.
5	Games shall always be arranged in accordance with the current game rules.

4.3.2 Instructions, information and game rules

1	Written instructions shall be in Danish and be both grammatically and syntactically correct. Guidance: This does not prevent translation of written instructions into other languages.
2	The base version language is Danish (if several languages are used).
3	Game rules shall be available to the customer online.
4	All playing information shall be given to the customer in the language chosen by the customer. Game rules and instructions shall be the same in all language versions.
5	All instructions and information shall be clear and specific.
6	Game rules and instructions shall be available without it being necessary to place a stake (see 4.1.1.5).
7	Game rules and instructions shall be available during the entire game. Guidance: Playing instructions shall be visible and readily accessible in all situations. Guidance: When a game temporarily changes character when it is played, the game rules and instructions shall be changed correspondingly.
8	The name of the game shall be visible to the customer in all situations.
9	The game rules shall describe all potential prizes (including random ones) as well as the largest possible prize per game unit stake in connection with the customer's stake.
10	Game rules shall include adequate information about all functions by which the chances of winning and the sizes of prizes in individual games are increased.
11	If a game is able to temporarily change character so that it deviates significantly from the basic game, the game shall show the current status for the next change to the game.

4.3.3 Return to players

1	The gambling system shall inform the customer of the theoretical return to player when using an optimal game strategy and it shall be clear which game options are not parts of an optimal game strategy. The information shall be available in the game rules for each game. Guidance: When a progressive prize is offered, it shall be implemented in a manner ensuring, that the theoretical minimum return to player is correctly displayed to the customer.
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5 Special gambling functionality

5.1 Peer-to-peer games

5.1.1 General

1	The gambling system shall keep a log of all participants in the games of the licence holder.
2	All participants playing against one of the licence holder's customers shall be connected to a gambling operator and unequivocally identifiable by the licence holder. Guidance: This does not prevent any player from being anonymous to other players.
3	As referred to in 5.1.1.1, data shall be kept within the licence holder's gambling system.
4	The gambling system shall include steps to prevent the customers from playing against themselves.
5	The gambling system shall have methods for discovering whether the same equipment is being used by one or more participants in the peer-to-peer system at the same time.
6	The gambling system shall, as far as possible, include a limitation so that the same equipment is not being used by one or more participants in the peer-to-peer system at the same time.

5.1.2 Rules and information

1	The rules described in 3.1.1 and 4.3 also apply to peer-to-peer games.
2	The rules shall contain a ban against customers playing against themselves, irrespective of whether this be through the same operator or not.
3	The rules shall prohibit collusion, etc.
4	The rules shall address the customer's use of end-user automation (bots).
5	The rules shall address how interruptions of ongoing games are handled.
6	Fees, etc. shall be clearly stated and accessible to all potential customers.

5.1.3 Monitoring

1	The gambling system shall have technical methods for disclosing suspicious circumstances on an ongoing basis (real-time).
2	The gambling system shall be capable of analysing suspicious events and use this as a basis for generating reports.
3	The gambling system shall have technical methods to support the rules (5.1.2.4) regarding the customer's use of add-on applications for automation of games.

5.2 Live casino gambling

5.2.1 Games

1	Game symbols applied in live casino games shall be automatically registered by "studio technology".
2	Game symbols applied in live casino games shall be reported to the gambling system.
3	Game rules for live casino games shall be programmed into the gambling system.

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4	The gambling system shall be capable of analysing live casino games with a view to mapping irregularities and deviations and use this as a basis for generating reports.
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5.2.2 Customer interface

1	The terms and conditions described in 3.1.1 and 4.3 also apply to live casino games. Guidance: The terms and conditions governing live casino games shall have special focus on communication errors and asynchronous data streams and conflict resolution.
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5.2.3 Surveillance

1	The live casino gaming components of the gambling system shall include video surveillance.
2	The video surveillance (5.2.3.1) shall be sufficient to prove whether the game rules are being complied with and identify discrepancies.
3	Date and time shall appear from video surveillance (5.3.3.1).

5.2.4 Access control

1	There shall be formal physical access control to the live casino game studio and the adjoining facilities.
2	As a minimum, the access control (5.3.4.1) shall differentiate between persons with job functions such as dealer, pit boss, managers and surveillance so that they are included in separate access groups.

5.3 Jackpots

5.3.1 Rules

1	The rules for a given jackpot shall describe how the customer can win it.
2	The rules for a given jackpot shall describe how it is funded, and it shall be made clear how contributions to the jackpot are made.
3	The rules for a given jackpot shall describe how the prizes are determined and awarded. Guidance: A given jackpot may be configured with divided pools. Divided pools are arrangements where a part of the contributions to the large jackpot are redirected to another pool so that when the jackpot has been won, this pool will form the basis of the next jackpot.
4	The rules of a given jackpot shall describe or link to a description of the consequences of incomplete communication and other aspects of the game that may affect the customer's participation, including the customer's perception of his or her participation.
5	The rules of a given jackpot shall describe how the licence holder will treat and resolve situations in which one or more customers think they have won the same jackpot.
6	The rules for a given jackpot shall describe how the licence holder may interrupt or discontinue a jackpot.

5.3.2 Jackpot setup

1	The gambling system shall maintain strict access control in relation to changes to jackpot configurations (jackpot parameters). Particularly changes made after initiation shall be limited.
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2	<p>The gambling system shall ensure that the default functionality maintains the configuration status for existing jackpots if the configuration is changed before the existing prizes have been distributed.</p> <p>Guidance: When a jackpot has been initiated, the parameter changes shall not enter into force immediately but should rather be saved for application until after the jackpot has been won. These parameters are called "waiting" parameters.</p>
3	<p>Jackpot parameters shall not be affected by the functions for deactivating/activating the jackpot.</p>

5.3.3 Jackpot notification

1	<p>The gambling system shall ensure that the current jackpot amount is shown on all participating customers' equipment.</p>
2	<p>The gambling system shall update the jackpot amount on all participating customers' equipment with a maximum interval of 30 seconds.</p> <p>Guidance: It is accepted that delays in communication are variable depending on the type of medium and thus outside the knowledge and influence of the licence holder, but licence holder should, as far as possible, take this into account when setting the time for the update.</p>
3	<p>The gambling system shall ensure that a winning customer is notified of a jackpot immediately after it is triggered.</p>
4	<p>Immediately after the jackpot is triggered, the gambling system shall inform all participating customers of its value, etc.</p> <p>Guidance: This also includes customers who are viewing the game and/or the game page without having contributed to the jackpot.</p>

5.3.4 Jackpot triggers

1	<p>The gambling system shall keep a detailed, exhaustive log which is suitable for auditing and which shows all triggered jackpots.</p>
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5.3.5 Jackpot report

1	<p>The gambling system shall keep a detailed, exhaustive log which is suitable for auditing and which records the current jackpot status, including the following information:</p> <ul style="list-style-type: none"> • date and time • configuration • contributions • triggers • prizes • access of authorised personnel
2	<p>The gambling system shall save the jackpot status on redundant and error-tolerant media (see 5.3.5.1).</p>
3	<p>The gambling system shall be able to restore jackpot amounts and jackpot prizes on the basis of customer contributions to the jackpot.</p>

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5.3.6 Jackpot discontinuation

1	The gambling system shall clearly show if a jackpot is not available to the customer.
2	The gambling system shall ensure that all return to player information available to customers is correct, irrespective of whether the jackpot is available or not.
3	The gambling system shall ensure that a discontinuation of a jackpot does not affect the jackpot configuration (see 5.3.2.3).

6 Management

6.1 General

6.1.1 Activation and deactivation of games

1	The gambling system shall provide means to activate and deactivate individual games immediately.
2	The gambling system shall provide means to activate and deactivate all games immediately.
3	The gambling system shall provide means to activate and deactivate each customer's gaming activities immediately.
4	Information about activation and deactivation shall be saved in a log.
5	When a game has been deactivated, it shall not be shown on the webpage, and it shall remain unavailable for the entire deactivation period.
6	When a game is deactivated, the customer shall be able to complete any ongoing games.
7	When a multi-state game (i.e. a game which consists of several steps of action) is deactivated, customers shall be able to complete ongoing games at next login. If it is impracticable to do this, the customers shall be informed about this by the gambling system.

6.1.2 Incomplete games

1	<p>The gambling system shall allow the customer to complete any incomplete games.</p> <p>Guidance: Incomplete games include: (a) loss of communication, (b) system reboots, (c) games being deactivated/activated, (d) customer rebooting, (e) abnormal shutdown of client, etc. After reestablishment, the systems shall display the unfinished games to the customer.</p> <p>Guidance: A situation where a customer is dropped from a peer to peer game due to reasons not attributed the gambling system is not considered an incomplete game for the customer in question.</p>
2	<p>The gambling system shall ensure that all incomplete games are accounted for, and that the customer knows the status of these games and his or her stake.</p> <p>Guidance: Stakes that are locked in incomplete games that can be completed shall be held in a separate account until the game is completed. Incomplete games shall be shown separately in the customer's gambling account.</p>
3	Incomplete games shall be decided upon within 90 days. The game rules and/or terms and conditions shall state what will happen with the customer's stake.

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4	If the gambling system is unable to complete an incomplete game, the gambling system shall be able to calculate any amounts due to the customer.
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6.1.3 Error handling procedures

1	The procedure for handling errors in the gambling system shall be described clearly in the game rules.
2	The gambling system shall record all system errors, including their cause and solution.
3	If a game cannot be completed because of an error, please refer to 6.1.2.
4	The gambling system shall be able to generate a report based on the data collected in accordance with 6.1.3.3.

6.1.4 Customer sessions & play sequence

1	<p>The gambling system shall ensure that a customer cannot start a new game until the ongoing game is completed and all logs and balances have been updated.</p> <p>Guidance: This does not prevent a customer from playing several different games at the same time.</p>
2	The customer's game and/or account balance cannot be negatively affected in the event of breakdowns or rebooting of the gambling system or parts thereof.

6.1.5 Records, logs and data retention

1	<p>Customer actions shall be recorded in a log throughout a session (from a customer logs in until the customer logs out again) as session information.</p> <p>Guidance: The customer's game and/or account balance cannot be negatively affected in the event of an interruption of a session caused by the gambling system.</p> <p>Guidance: In this context, the concepts "session" and "session information" shall be interpreted independently from Appendix 1 "Technical requirements to be met by licence holders" to the Executive Order.</p>
2	<p>The gambling system shall store information about the session (6.1.5.1).</p> <p>Session information shall include:</p> <ul style="list-style-type: none"> • customer ID • start and end times of the session • details of the customer's equipment • total amount staked during the session • total stake amount won during the session • total amount deposited into the gambling account during the session (time-stamped) • total amount withdrawn from the gambling account during the session (time-stamped) • time of last confirmation of the session • the reason for ending the session and • information about the game during the session
3	The gambling system shall retain customer details.

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	<p>Customer details shall include:</p> <ul style="list-style-type: none"> • customer identification details • gambling account details and balance • suspension and self-exclusion status • previous gambling accounts and the reason for deactivation and • session information (6.1.5.2)
4	<p>The gambling system shall record information about games played.</p> <p>Information about games played shall include:</p> <ul style="list-style-type: none"> • customer ID • identification of game and version and • information about all games in which the customer has participated
5	<p>The gambling system shall maintain information about games.</p> <p>Information about games shall include:</p> <ul style="list-style-type: none"> • customer ID • start time of the game based on the gambling system • balance at the time of the start of the game • stake (time-stamped) • contribution to jackpots • game status (ongoing, complete, etc.) • outcome of the game (time-stamped), • jackpot prize (if relevant) • end time of the game based on the gambling system • winnings • gambling account balance at the end of the game and • all games not completed and the reason for this
6	<p>The gambling system shall record information about significant events.</p> <p>Information about significant events shall include:</p> <ul style="list-style-type: none"> • major winnings (to be determined by the licence holder) • large transfers of funds (individual and total transfers over a specified period of time) • changes to game parameters • changes to jackpot parameters • newly established jackpots • customers' participation in jackpots • payout of jackpot • discontinuation of jackpot and • customer self-exclusions and suspensions (including requests for cancellation of suspension/exclusion as well as the actual cancellation of a suspension/exclusion)
7	<p>The gambling system shall record events, including:</p> <ul style="list-style-type: none"> • customer set-up/establishment of a gambling account and deactivation/closing of a gambling account • changes in customer details • changes in game parameters and jackpots • creation or discontinuation of jackpots • major winnings or jackpot prizes • transfers of large amounts of money and

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	<ul style="list-style-type: none">• loss of communication with a customer's equipment or time-out
8	The gambling system shall retain customer identity and control information about the customer for at least five years after the customer relationship has ceased.
9	The gambling system shall retain documentation and registrations about customer transactions for at least five years from the time of the transaction.