

The Danish Gambling Authority's Certification Programme



Inspection Standards for Online Casino –
SCP.02.03.EN.2.1

Contents

1.	Objectives of the inspection standards.....	3
1.1	Scope of this document.....	4
1.2	Version.....	4
1.3	Applicability.....	5
1.3.1	Specifically, regarding offer of online bingo via television.....	5
2.	Frequency and testing organisations.....	6
2.1	Certification frequency.....	7
2.1.1	Initial certification.....	7
2.1.2	Renewed inspection.....	7
2.1.3	Postponement of renewed inspection.....	7
2.2	Accredited testing organisations.....	7
2.2.1	Requirements for accredited testing organisations.....	7
2.2.2	Requirements for personnel who performs inspections.....	8
2.2.3	Requirements for personnel who supervise inspection and attest the certification report.....	8
3.	Gambling accounts.....	9
3.1	General.....	10
3.1.1	General terms and conditions of the licence holder.....	10
3.1.2	Licence, supervision, and labelling scheme.....	10
3.1.3	Complaints.....	10
3.2	Management of gambling accounts.....	11
3.2.1	Customer registration.....	11
3.2.2	Customer verification process.....	11
3.2.3	Use of electronic ID.....	12
3.2.4	Customer access.....	12
3.2.5	Changes to customer data.....	12
3.2.6	Activation and deactivation.....	13
3.2.7	Suspension.....	13
3.3	Responsible gambling.....	13
3.3.1	Customer self-limitation.....	13
3.3.2	Customer protection information.....	14
3.4	Funds and transactions.....	15
3.4.1	Currencies.....	15
3.4.2	Deposits.....	15
3.4.3	Withdrawals.....	15
3.4.4	Other customer transactions.....	16
3.4.5	Other account movements, bonuses, etc.....	16
3.4.6	Account statement etc.....	17
3.5	Reports.....	17
3.5.1	General.....	17
4.	Written presentation.....	18
4.1	Written information, game rules and instructions.....	19
4.1.1	General.....	19
4.1.2	Game rules and instructions.....	19
4.2	Stakes and winnings.....	19
4.2.1	Information about stakes and winnings.....	19
4.3	Return to players.....	20

4.3.1	Information about return to players	20
5.	Visual presentation	21
5.1	Graphics	22
5.1.1	General	22
5.1.2	Outcomes	22
5.1.3	Symbols	22
5.1.4	Gaming machines	22
5.1.5	Card games	22
5.1.6	Roulette	23
5.1.7	Dice	23
5.1.8	Online bingo	23
6.	General gambling functionality	24
6.1	Game execution	25
6.1.1	General	25
7.	Special gambling functionality	26
7.1	Peer-to-peer games	27
7.1.1	General	27
7.1.2	Rules and information	27
7.1.3	Monitoring	27
7.2	Live casino gambling	27
7.2.1	General	27
7.2.2	Customer interface	28
7.2.3	Surveillance	28
7.2.4	Access control	28
7.3	Jackpots	28
7.3.1	Rules	28
7.3.2	Jackpot setup	28
7.3.3	Jackpot notification	29
7.3.4	Jackpot triggers	29
7.3.5	Jackpot report	29
7.3.6	Jackpot discontinuation	29
7.4	Online bingo	29
7.4.1	General	29
7.4.2	Online bingo offered via television	30
8.	Management of gambling functions	31
8.1	General	32
8.1.1	Activation and deactivation of games	32
8.1.2	Incomplete games	32
8.1.3	Error handling procedures	32
8.1.4	Play sequence	32
8.1.5	Registration, maintenance, and storage of data	33

Objectives of the inspection standards

1

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 The Danish Gambling Authority 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 The Danish Gambling Authority. 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

Requirements on how testing organisations obtain accreditation for inspecting the gambling system, business processes and business systems of the licence holder have been specified as well as requirements on how often inspection shall be done. These requirements are described in section 2 "Frequency and testing organisations".

The licence holder's gambling system shall have functionalities concerning gambling accounts, general terms and conditions, management of gambling accounts, responsible gambling, funds and transactions as well as various reports. Requirements on this are described in section 3 "Gambling accounts".

There are requirements regarding the written presentation of e.g., game rules, stakes, winnings and return to player. Requirements on this are described in section 4 "Written presentation".

Besides the requirements on written presentation there are also general and specific requirements of the visual presentation. Requirements on this are described in section 5 "Visual presentation".

The gambling system shall have a number of general gambling functionalities in relation to completion of games. Requirements on this are described in section 6 "General gambling functionality".

On top of the required general gambling functionalities, there are special gambling requirements in relation to peer-to-peer games, live casino and online bingo. Requirements on this are described in section 7 "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 8 "Management of gambling functions".

1.2 Version

The Danish Gambling Authority continuously revises the certification programme. The latest version and the version history are accessible at The Danish Gambling Authority's website.

Version 1.0 of 2014.07.04

- 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.

Version 1.1 of 2018.01.01

- Changes completed because of liberalization of online bingo, betting on horse- and dog races and betting on pigeon races. 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. Adjustments have also been made to guidance texts throughout the inspection standards.

Version 1.2 of 2020.01.01

- 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. Spillemyndigheden has removed the requirement saying the ATO's accreditation must refer to a specific version cf. section 2.2.

Version 2.0 of 2023.01.01

- The structure in the document has changed, so the main sections now appear in the following order: Written presentation, visual presentation, general gambling functionality and special gambling functionality. Update of requirements for accredited testing organisations and staff. The requirements for online bingo have been moved to the section on peer-to-peer games. Furthermore, general adjustments and specifications have been made.

Version 2.1 of 2023.10.01

- Updated visual layout of the document. Minor linguistic corrections. No changes to requirements.

When a new version of the certification programme is released, The Danish Gambling Authority will, if necessary, publish guidelines for a transition period and validity of already completed inspections.

It must be emphasised that only the Danish version is legally binding. The English version holds the status of guidance only.

1.3 Applicability

Inspection Standards for Online Casino are applicable for provision of:

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

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

- Section 3: 3.1.19, 3.2.2.5, 3.2.3, 3.2.4.1, 3.2.4.2, 3.2.5, 3.3.1.4, 3.3.1.1-3.3.1.4, 3.3.1.7-3.3.1.9, 3.4, 3.5.
- Section 4: 4.1.2.2-4.1.2.3, 4.2.
- Section 5: 5.1.1, 5.1.4-5.1.7
- Section 6: 6.1.1.2
- Section 7: 7.1, 7.2, 7.3.3, 7.4.1.5, 7.4.1.10, 7.4.1.12
- Section 8: 8.1.1-8.1.2, 8.1.3.3-8.1.3.4, 8.1.4, 8.1.5.1-8.1.5.2, 8.1.5.4-8.1.5.5

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.

Frequency and testing organisations

2

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 be certified before a licence to offer games can be issued unless the Danish Gambling Authority has informed otherwise. See section 2.1.3 in the general requirements for further information.

2.1.2 Renewed inspection

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

The standard report, which documents the renewed inspection, must be in the Danish Gambling Authority's possession no later than two months after the inspection was done.

A renewal of the inspection may be based on sampling, spot checks and compliance with the requirements set out in the document "SCP06.00.DK - Change Management Programme".

2.1.3 Postponement of renewed inspection

The licence holder can choose to postpone the inspection up to two months from the time where a new inspection should have been completed. The new inspection must be finalised no later than 14 months after the latest inspection and the standard report must be submitted to The Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be notified before the inspection is postponed.

The deadline for renewal of inspection 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 inspection is due 10 months later. The time for the next inspection shall be reflected in the standard report.

The option to postpone the inspection only applies to the licence holder. This means that the option does not apply to any suppliers the licence holder may have.

2.2 Accredited testing organisations

To ensure that the necessary qualifications are in place during the certification the testing organisation and their staff shall fulfil the requirements in this section.

2.2.1 Requirements for accredited testing organisations

Inspection of online casino shall be conducted as accredited inspection by an inspection body, who is accredited as type A after ISO/IEC 17020 for inspection or ISO/IEC 17065 referring to Spillemyndighedens Certification Programme SCP.02.03.DK. Accreditation shall be done by DANAK (the Danish Accreditation Fund) or a similar accreditation body, who is co-signer of EA's (European co-operation for Accreditation) multilateral agreement on reciprocal

recognition regarding inspection, or for inspection bodies outside EA's jurisdiction, by an accreditation body, who is co-signer of ILAC's (the International Laboratory Accreditation Cooperation) multilateral agreement on reciprocal recognition regarding inspection.

Documentation for the accreditation shall be enclosed with the certification. Alternatively, a link to the accreditation can be provided in the certification report.

2.2.2 Requirements for personnel who performs inspections

The certification work shall be carried out by staff with sufficient qualifications cf. section 6 in ISO/IEC 17020 and/or section 6 in ISO/IEC 17065, which means that the accredited testing organisation shall hire sufficiently qualified, competent and experienced personnel.

2.2.3 Requirements for personnel who supervise inspection and attest the certification report

Inspection shall be supervised, and the certification report shall be attested by one or more persons who warrant(s) that inspection 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. have at least five years of professional experience in inspecting gambling systems and
- c. Shall be certified as:
 - International Information Systems Security Certification Consortium (ISC)2 Certified Information Systems Security Professional (CISSP), or
 - Information Systems Audit and Control Association (ISACA) Certified Information Systems Auditor (CISA).

See section 2.2 in the general requirements for further information.

Gambling accounts

3

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.
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 funds on: <ul style="list-style-type: none"> • passive gambling accounts • suspended gambling accounts • gambling accounts of self-excluded players
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 The Danish Gambling Authority and there must be a link to The Danish Gambling Authority's website.
2	The Danish Gambling Authority's label must be placed on the licence holder's website or user interface.
3	S The Danish Gambling Authority'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 The Danish Gambling Authority's label must be easily visible for the player.

3.1.3 Complaints

1	<p>Complaints from players shall be registered in a log, containing information about:</p> <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</p>
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	holder and still doesn't agree with the casework time or the result hereof.
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3.2 Management of gambling accounts

3.2.1 Customer registration

1	<p>During the registration process, the gambling system shall collect and save the following information about the customer:</p> <ul style="list-style-type: none"> • full name • 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	The gambling system shall register the time of receipt of the identification data.
4	The gambling system shall confirm that the customer is not registered in The Danish Gambling Authority's Register of Self-excluded Persons (ROFUS).
5	<p>The gambling system must ensure that the transfer for the customer's registration data takes place through an encrypted connection (such as SSL).</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 must save the following documentation of the customer verification:</p> <ul style="list-style-type: none"> • full name • 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	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 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 must ensure, that the transfer of the customer identification data takes place through an encrypted connection (such as SSL).
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 Use of electronic ID

1	<p>The gambling system shall ensure, that electronic ID is used in the following situations:</p> <ol style="list-style-type: none"> 1) Creation of an account 2) When changing and approving a device 3) Changing information about the customer's identity, including name and civil registration number <p>Guidance: By "electronic ID" is meant, for example, NemID or MitID or other electronic ID approved by the Danish Gambling Authority.</p> <p>Guidance: By "changing and approving a device" is meant situations where a player logs in to his game account from, for example, a smartphone, PC or tablet, which the player has not previously used.</p> <p>Guidance: This requirement does not apply to players registered without a CPR number.</p>
2	<p>The gaming system must ensure that the level of security when using electronic ID, cf. requirement 3.2.3.1, is "significant". The "significant" level of security must be in accordance with the description in the NSIS standard, which forms the basis for MitID.</p>
3	<p>The gaming system must ensure that strong customer authentication is used in the following situations:</p> <ol style="list-style-type: none"> 1) Upon deposits into an account 2) Upon withdrawals from an account 3) When changing payment instrument <p>Guidance: "Strong customer authentication" must be in accordance with the concept in the Payment Act and must therefore be a two-factor approval, which consists of a combination of "something that the customer is" (biometric data), "something that the customer knows" (e.g., a password) and "something that the customer has" (e.g., a smartphone).</p> <p>Guidance: "Payment information is, for example, payment cards or similar for use in transfers of funds to / from the account.</p> <p>Guidance: Double authentication is not required. Therefore, if a payment service is used that has implemented strong customer authentication in three situations, they should not also be met by the gaming provider.</p>

3.2.4 Customer access

1	<p>If no electronic ID is used when logging in to the account, the game system must ensure that each login has a reassuring identification of the player.</p>
2	<p>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.</p>
3	<p>In connection with the customer's log-in, the gambling system shall show the date and time of the previous log-in session.</p>
4	<p>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.</p>
5	<p>The customer protection information shall contain or link to information about how customers can detect unauthorised use of their gambling accounts.</p>

3.2.5 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	<p>The gambling system shall record and save information on password changes as described in 3.2.5.1.</p>

3	The gambling system shall save changes in customer details in an auditable log.
4	The gambling system shall save documentation showing that changes to customer identification data are correct.
5	The gambling system shall ensure that changes to the customer identification data takes place through an encrypted connection (such as SSL).

3.2.6 Activation and deactivation

1	<p>The gambling system shall make it possible for authorised personnel to activate and deactivate gambling accounts.</p> <p>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</p>
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.

3.2.7 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 3.2.7.1, 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 Responsible gambling

3.3.1 Customer self-limitation

1	<p>The gambling system shall ensure, that the customer sets a deposit limit before the customer can start playing.</p> <p>The customer shall at least set one of the following deposit limits:</p> <ol style="list-style-type: none"> threshold amount for total daily deposits into the gambling account, threshold amount for total weekly deposits into the gambling account, or threshold amount for total monthly deposits into the gambling account. <p>Guidance: Durations are measured by the Danish calendar.</p> <p>Guidance: A daily deposit limit applies from midnight to midnight. A weekly deposit limit applies from Monday through Sunday. A monthly payment limit follows the calendar months.</p> <p>Guidance: Payments from the gaming account must not be set off against the customer's deposit limit.</p>
2	<p>The amounts for deposit limits according to requirement 3.3.1.1 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>
3	<p>As soon as the gambling system receives a request for a lower deposit limit from a customer in accordance with requirement 3.3.1.1, the limit shall be implemented for all future gambling activities.</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>

4	When a customer requests to change to a higher deposit limit determined cf. section 3.3.1.1, the gambling system shall ensure, that the new deposit is not implemented at least until 24 hours later.
5	<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"> brief break from playing (cool-off period) of 24 hours, exclusion for at least 30 days, and 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 by the Danish calendar. Apart from the cooling period of exactly 24 hours, self-exclusions must not be less than 30 days.</p>
6	Immediately after reception of a request for self-exclusion cf. req. 3.3.1.5, 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.
7	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).
8	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 for the same customer must be created after 1 year at the earliest.
9	<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>
10	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.

3.3.2 Customer protection information

1	It must appear from the licence holder's website or user interface that it is illegal for people below the age of 18 years to participate in gambling.
2	The licence holder's user interface shall provide information about responsible gambling and the potential harmful effects of gambling.
3	The licence holder's user interface shall provide a link to a gambling addiction self-test.
4	The licence holder's user interface shall provide information about and addresses for Danish treatment centres.
5	The licence holder's 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 user interface shall provide information about Spillemyndigheden's helpline for responsible gambling.
7	The licence holder's 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 user interface shall provide information about or link to the terms and conditions applicable to the customers.
9	<p>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.</p> <p>Guidance: The information must not be given in an inaccurate language or be mixed with other information. The player must not be able to overlook the information.</p>

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 time 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	<p>The gambling system shall only accept deposits of up to DKK 10,000 (or a corresponding amount in another currency) for temporary gambling accounts.</p> <p>Guidance: This limit is a cumulative sum of all deposits made by the customer.</p>
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	<p>The gambling system shall have an auditable log which shows all amounts deposited. This log shall, as a minimum, include the following information:</p> <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	<p>The gambling system shall only be capable of withdrawing funds from gambling accounts for which customer identification has taken place.</p> <p>Guidance: Withdrawals shall not be made from temporary gambling accounts but remaining deposited funds may be returned.</p>
2	The gambling system may not allow a withdrawal which will result in the customer's account balance becoming negative.
3	<p>The gambling system shall allow customers to withdraw all released funds.</p> <p>Guidance: This does not limit the licence holder's possibility for performing controls on withdrawal frequencies, identity, etc.</p>
4	The gambling system shall inform the customer clearly and specifically of all restrictions regarding withdrawals and

	<p>access to funds in connection with withdrawals.</p> <p>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.</p>
5	<p>When the customer is withdrawing funds, the gambling system shall provide clear and specific 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 explicitly informed of this before the withdrawal request.</p>
6	<p>The gambling system shall have an auditable log which shows all amounts withdrawn. As a minimum, the log shall contain information about the following:</p> <ul style="list-style-type: none"> • date and time • payment channel • customer • 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 different players' 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	<p>The gambling system shall credit all winnings to the gambling account immediately.</p> <p>Guidance: Winnings may be withheld for further results checks, etc.</p>
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 Other account movements, bonuses, etc.

1	<p>The gambling system shall give clear and specific information to customers as to the reasons for other account movements.</p> <p>Guidance: "Other account movements" can be e.g., debits and credits related to bonuses.</p>
2	The gambling system shall give clear and specific information to customers as to the terms, conditions and limitations applicable in connection with any other account movements, bonuses, etc.
3	The gambling system shall have an auditable log which shows all other account movements, bonuses, etc.
4	<p>The gambling system shall be able to generate reports which accurately show all other account movements, bonuses, etc. The reports must as a minimum contain information on:</p> <ul style="list-style-type: none"> • Transaction ID • The size of the bonus • Bonus 'status <p>Guidance: The size of the bonus is the amount that the license holder allocates to the player. The amount is stated regardless of whether the player succeeded in meeting the play-through requirement or not.</p>

	Guidance: It must be stated whether the bonus has been played through, is ongoing or has expired without the play-through requirements being met.
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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.
3	The customer must have access to guiding text about transactions in the customer's gambling account.

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 inactive gambling accounts and use this as a basis for generating reports. Guidance: An inactive gambling account is defined as an account where there has never been gambling activity or where there has been no gambling activity for a year.
3	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.
4	The gambling system shall be able to generate reports of all customer registrations (complete and incomplete).
5	The gambling system shall be able to generate reports of all registered customers, their account information (including inactive gambling accounts) and date of registration.
6	The gambling system shall be able to generate reports of all suspended and/or self-excluded customers.
7	The gambling system shall be able to generate reports listing all customers with gambling limits.
8	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).
9	The gambling system shall be able to generate reports for each gambling account if required. Guidance: The reports must be able to provide information on: <ul style="list-style-type: none"> • Deposits, • stakes, • commission, rake etc. • winnings, • withdrawals • fees, • other account movements • funds that have been inactive for more than 90 days

Written presentation

4

4.1 Written information, game rules and instructions

4.1.1 General

1	All written information, game rules and instructions shall be true and unambiguous.
2	Written information, game rules and instructions shall be in Danish and be both grammatically and syntactically correct. Guidance: This does not prevent translation of written instructions into other languages.
3	The base version language is Danish (if several languages are used). Exception: If games are offered at Greenland, the basic language can be Greenlandic.
4	All written information, game rules and instructions must be the same in all language versions and must be displayed in the language chosen by the customer.

4.1.2 Game rules and instructions

1	All games must have associated game rules and instructions for all aspects of the game. Guidance: In relation to "all aspects", for example, it must generally be stated what the consequences for loss of communication to the game are, and in rules for card games, it must be stated, for example, how often the cards are shuffled. "All aspects" must thus be interpreted broadly.
2	The gaming system must ensure that the rules and instructions (including restrictions on gaming and how the customer plays) are easily accessible from all gaming sites related to the game.
3	Game rules and instructions must be available to the customer through the same media and on the same device used to play the game.
4	Game rules and instructions shall be available without it being necessary to place a stake (see 6.1.1.4).
5	Game rules and instructions shall be available during the entire game. Guidance: Playing instructions shall be visible and readily accessible in all situations.
6	Game rules and instructions may not change during the course of the game, unless the game temporarily changes character (see 4.1.2.7)
7	If a game temporarily changes character when it is played, the game rules and instructions shall be changed correspondingly

4.2 Stakes and winnings

4.2.1 Information about stakes and winnings

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 clearly display all possible winnings, all possible combinations of winnings and the biggest possible win for the different stakes.
4	The game rules must contain adequate information about all features thereby increasing the chances of winning and the winning sizes in the individual game.
5	The gambling system shall clearly display the maximum stake.
6	The gambling system shall clearly display the minimum stake.

4.3 Return to players

4.3.1 Information about return to players

1	<p>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.</p> <p>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.</p>
2	<p>If a deposit is made for a jackpot in connection with a game, the effect of the jackpot must be considered when stating the return to player.</p>

Visual presentation

5

5.1 Graphics

5.1.1 General

1	The gambling system shall ensure that the name of the game is shown on all pages related to the game. Guidance: The game name may be visible in the title bar of the window or the tab in which the game is running.
2	The gambling system shall ensure that the balance of the gambling account is shown or readily accessible from all game pages.
3	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.
4	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).
5	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.
6	If a game temporarily changes, so that it differs significantly from the base game, the game must indicate the current status. Instructions: The deviation from the basic game can be a feature and / or a bonus game. It must therefore be clear to the player, when there is a transition between basic games and feature / bonus games.

5.1.2 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.

5.1.3 Symbols

1	A symbol shall have the same shape and colour consistently throughout each game unless animations are used.
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5.1.4 Gaming machines

1	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. Guidance: If some symbols follow the same winnings scale, they should be placed in an area visually related to this winnings scale. Guidance: If winnings can be won for different combinations of symbols, the illustration shall clearly show the combination.
2	The gambling system shall display: <ul style="list-style-type: none"> • How many lines the player has selected • which betting unit the player has chosen per line and • the total stake per game (number of lines x bet per line).

5.1.5 Card games

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

1	<p>The roulette wheel shall have 36 pockets numbered from 1 to 36 and 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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5.1.7 Dice

1	<p>Dice shown as traditional dice shall have six sides that are numbered with 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.</p> <p>Guidance: Online casino games where dice are the main game cannot be offered. Dice can, for example, occur in feature games.</p>
2	It shall be clear which side of the dice decides the game.

5.1.8 Online bingo

1	The gambling system shall have a continuous display, which clearly shows all drawn numbers/symbols.
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General gambling functionality

6

6.1 Game execution

6.1.1 General

1	Games must at all times be settled in accordance with the applicable game rules.
2	The gambling system shall only permit participation in games by a gambling account when the customer verification process has been correctly completed. Guidance: This does not exclude participation in games from temporary gambling accounts.
3	The gambling system must ensure that the customer can only be logged in from one device at a time.
4	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).
5	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.
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.

Special gambling functionality

7

7.1 Peer-to-peer games

7.1.1 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. Guidance: This does not prevent any player from being anonymous to other players.
3	As referred to in 7.1.1.1, the log 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.

7.1.2 Rules and information

1	The rules described in 3.1.1 and 4.1 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	It must be clear from the game rules if a commission is charged and with what amount / percentage of the stake. Guidance: Commission is an amount that the player pays to participate in a game such as online bingo or poker (participation fee / rake) in addition to the stake for the game itself. Commission is not included in the prize pool.

7.1.3 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 (7.1.2.4) regarding the customer's use of add-on applications for automation of games.

7.2 Live casino gambling

7.2.1 General

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.
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.

7.2.2 Customer interface

1	The terms and conditions described in 3.1.1 and 4.1 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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7.2.3 Surveillance

1	The live casino gaming components of the gambling system shall include video surveillance.
2	The video surveillance 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. Time zone must either also appear, or it must be clear in the licence holder's own documentation.

7.2.4 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 (7.2.4.1) shall differentiate between persons with job functions such as dealer, pit boss, managers and surveillance so that they are included in separate access groups.

7.3 Jackpots

7.3.1 Rules

1	The rules for a given jackpot shall describe how the customer can win it.
2	The rules for a given jackpot shall state the probability that the customer will win it. Guidance: It must be clearly stated to the player if the probability of winning a jackpot is not constant eg. if the probability changes over time.
3	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.
4	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 jackpot are redirected to another pool so that when the jackpot has been won, this pool will form the basis of the next jackpot (Seed and re-seed). Guidance: It must be clearly stated in the game rules, if the jackpot is set to be triggered before a certain time.
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 discontinue a jackpot and what happens to the funds in the jackpot pool if the jackpot is closed.

7.3.2 Jackpot setup

1	The gambling system shall maintain strict access control in relation to changes to jackpot configurations . Particularly changes made after initiation shall be limited.
2	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. 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.

3	The gambling system must ensure that the jackpot configuration is not affected by the features to deactivate / activate the jackpot. Guidance: "Deactivation" should not be confused with "closing". Deactivation is a temporary status.
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7.3.3 Jackpot notification

1	The gambling system shall ensure that the current jackpot amount is shown on all participating customers' equipment, unless the customer has actively opted out of this.
2	The gambling system shall update the jackpot amount on the client side with a maximum interval of 30 seconds.
3	The gambling system shall ensure that the winner of a jackpot is notified immediately after the jackpot has been won.
4	Immediately after the jackpot is triggered, the gambling system shall inform all participating customers of its value, etc. Guidance: This also includes customers who are viewing the game and/or the game page without having contributed to the jackpot.

7.3.4 Jackpot triggers

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

1	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: <ul style="list-style-type: none"> • date and time • configuration • contributions • triggers • prizes • access of authorised personnel
2	The gambling system shall save the jackpot status on redundant and error-tolerant media (see 7.3.5.1).
3	The gambling system shall be able to restore jackpot amounts and jackpot prizes on the basis of customer contributions to the jackpot.

7.3.6 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 theoretical return to player information available to customers is correct, irrespective of whether the jackpot is available or not.

7.4 Online bingo

7.4.1 General

1	The gaming system should only allow online bingo to be offered as a peer-to-peer game. Online bingo must therefore comply with the requirements in section 7.1. Guidance: Online bingo can only be offered as a pool game.
2	The gambling system shall only allow online bingo with either 75, 80 or 90 numbers/symbols.
3	The gambling system shall ensure that for online bingo with 75 numbers/symbols the bingo card consists of 5 rows

	with 5 squares each.
4	The gambling system shall ensure that for online bingo with 80 numbers/symbols the bingo card consists of 4 rows with 4 squares each.
5	The gambling system shall ensure that for online bingo with 90 numbers/symbols the bingo card consists of 3 rows with 9 squares each.
6	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.
7	The gambling system shall generate the bingo cards randomly.
8	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.
9	The gambling system shall not allow the player to change the numbers/symbols on a bingo card.
10	The gambling system shall allow the player to manually mark the drawn numbers/symbols on the bingo card. Guidance: The player must be able to mark the drawn numbers/symbols on the bingo cards themselves. Marking is also known as "dabbing". 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.
11	The gambling system shall allow automatic marking ("dabbing") of drawn numbers/symbols on the player's bingo card.
12	The gambling system must end the game when the first player has a fully marked bingo card.
13	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. 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.

7.4.2 Online bingo offered via television

1	The value of each prize must not be higher than 5.000 DKK. Guidance. This value also applies for jackpots.
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 shall not be more than 45 percent.

Management of gambling functions

8

8.1 General

8.1.1 Activation and deactivation of games

1	The gambling system shall provide means to deactivate individual games immediately.
2	The gambling system shall provide means to 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 user interface, 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 states) is deactivated, customers shall be able to complete ongoing games at next login. This option may lapse after a period of not less than 90 days, if it is specified in the rules. (see 8.1.2.3)

8.1.2 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 loses the connection to a peer-to-peer game due to reasons not attributed the license holder is not considered an incomplete game for the customer.</p>
2	<p>The gambling system shall ensure that all incomplete games are accounted for, and that the customer has easy access to the status of these games including his or her stake.</p> <p>Guidance: Unfinished games and the stakes in such games must appear separately on the customer's gambling account</p>
3	Incomplete games shall be decided upon within 90 days from the time the game was interrupted. The game rules and/or terms and conditions shall state what will happen with the customer's stake.
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 according to the game rules.

8.1.3 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 immediately record all system errors. Cause and solution are registered when these are known.
3	If a game cannot be completed because of an error, please refer to 8.1.2.
4	The gambling system shall be able to generate a report based on the data collected in accordance with 8.1.3.3.

8.1.4 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 (see 8.1.2).

8.1.5 Registration, maintenance, and storage of data

1	<p>The gambling system must, as a minimum, record the following customer actions in a log throughout a session. A session is counted from a customer are logging in until the customer is no longer logged in (for whatever reason):</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 <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>
2	<p>The gambling system must, as a minimum, record the following customer details:</p> <ul style="list-style-type: none"> • Customer set-up/establishment of a gambling account • customer identification details • changes in customer details • deactivation/closing of a gambling account • gambling account details and balance • suspension and self-exclusion status • customer self-exclusions including requests exclusion as well as the actual cancellation of an exclusion • customer suspensions including requests for cancellation of suspension as well as the actual cancellation of a suspension • previous gambling accounts and the reason for deactivation and • session information (8.1.5.1)
3	<p>The gaming system must store customer identity and control information about the customer for at least five years after the customer relationship has ended.</p>
4	<p>The gambling system must, as a minimum, record and maintain the following information about games:</p> <ul style="list-style-type: none"> • Customer ID • Identification and version of the game • 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 (unfinished, completed 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 • games which are not completed and the reason for this.
5	<p>The gambling system must, as a minimum, record information about the following events:</p> <ul style="list-style-type: none"> • Large transfers of funds (individual and total transfers over a specified period of time) • major winnings (to be determined by the licence holder) • changes to game parameters • creation of jackpot • changes to jackpot parameters • customers' participation in jackpots • payout of jackpot • deactivation and activation of jackpots

	<ul style="list-style-type: none">• closing of jackpots• loss of communication with a customer's equipment or a timeout
6	The gambling system shall retain documentation and registrations about customer games and transactions for at least five years from the ending of the game or the time of the transaction.

