



System Audit

The System will be Submitted to the following checks:

1 Gaming System

1.1 System Architecture

- 1.1.1 The System's architecture has to be exactly as indicated in the application submission
- 1.1.2 The System has to use a secure communication protocol, as declared in the application submission, during player registration, change of password, logon, play, deposits and withdrawals of funds
- 1.1.3 Server clock should be synchronized with a reputable source

1.2 Application Architecture

- 1.2.1 The System's application architecture has to be exactly as indicated in the application submission:
 - Each application has to be installed in the location specified in the application submission
 - The version number of each application has to correspond to that notified in the application submission

1.3 Infrastructure Network

- 1.3.1 The System's infrastructure network has to match exactly that indicated in the application submission
- 1.3.2 The internal IP system has to match that indicated in the application submission (if not available at the time of the application submission, a network schematic with the respective internal IP addressing is required)

1.4 Class Category

- 1.4.1 The games should correspond with the Class category for which a license was applied

1.5 Random Number Generator

- 1.5.1 The installation of the brand and model of the RNG should be as stated in the application

1.6 System Security

- 1.6.1 The back-end System should automatically log-off after a specified period of inactivity
- 1.6.2 The players' passwords should be stored in one-way cryptographic hash format
- 1.6.3 Any players' credit card numbers should be stored in encrypted format

1.7 Player Account Security

- 1.7.1 Simultaneous player logon to the System should not be allowed
- 1.7.2 Players should be automatically logged off after a specified period of inactivity
- 1.7.3 The System should not allow players to save logon credentials
- 1.7.4 The System should lock a player's account after a specified number of failed logon attempts
- 1.7.5 The System should provide a lost password procedure for the purpose of recovering a lost password or providing players with a new one
- 1.7.6 Players should be obliged to change the password provided by the System through the lost password procedure on first logon
- 1.7.7 Player logon credentials should not be transmitted over an insecure protocol when the lost password feature is utilized by the player
- 1.7.8 The System should only accept robust passwords

1.8 Information to be maintained regarding Player Activity

- 1.8.1 The System must maintain information about the logon and logoff times of players
- 1.8.2 The System must maintain gaming activity history for each player
 - 1.8.2.1 The System must maintain information about the games played by each player
 - 1.8.2.2 The System must record, for each player, the time the game began as recorded on the games server
 - 1.8.2.3 The System must record the balance on the player's account at the start of the game
 - 1.8.2.4 The System must record, for each player, the time the stakes were placed in the game
 - 1.8.2.5 The System must record, for each player, the game status (in progress, complete, etc.)
 - 1.8.2.6 The System must record, for each player, the result of the game
 - 1.8.2.7 The System must record, for each player, the time the game ended
 - 1.8.2.8 The System must record the amount won or lost by each player for each game
 - 1.8.2.9 The System must record the balance on the player's account at the end of the game
 - 1.8.2.10 The System must record, for each player, the unique game ID

1.9 Gaming Activity History

- 1.9.1 The Back-Office application should be in a position to provide gaming activity history

1.10 Backup Management

- 1.10.1 A backup inventory system should be in place

2 Internal Procedures

2.1 Know Your Client Information

- 2.1.1 The Players' Database should store the identity verification status of each player

2.2 Gaming Tax Calculation

- 2.2.1 The System must be capable of producing monthly auditable and aggregate financial statements of gaming transactions
- 2.2.2 The System must calculate accurately all taxation and other monies due to the Authority (full detailed procedure with references to data fields, stored procedures, etc.)

2.3 Monthly Reporting

- 2.3.1 The System should be capable of calculating the total player liabilities at the end of the month (Chips in play and jackpots should also be included as player liabilities)
- 2.3.2 The System should be capable of identifying jackpot funds

2.4 System to adequately record Financial Transactions

- 2.4.1 The System should adequately record deposits, withdrawals, bonuses
- 2.4.1.1 The System should adequately record deposits information by players
- 2.4.1.1.1 The System should record the date of each deposit by each player
- 2.4.1.1.2 The System should record the origin of each deposit
- 2.4.1.1.3 The System should record the amount of each deposit
- 2.4.1.2 The System should adequately record withdrawal information by players
- 2.4.1.2.1 The System should record the date of each withdrawal by each player
- 2.4.1.2.2 The System should record the destination of each withdrawal
- 2.4.1.2.3 The System should record the amount of each withdrawal
- 2.4.1.3 The System should record information about bonuses
- 2.4.1.3.1 The System should record the bonus for which a player has qualified
- 2.4.1.3.2 The System should record the bonus amount given to a player
- 2.4.1.3.3 The System should record the dates when the bonus was played
- 2.4.1.3.4 The System should record the bonus amounts played by each player

2.5 Accounting software

- 2.5.1 The accounting software should be inputted with the gaming and financial transactions

2.6 Registration of Players

- 2.6.1 The registration process should be carried out over a secure protocol
- 2.6.2 The registration process should record detailed player information
- 2.6.3 The registration process should record the age of the player
- 2.6.4 The registration process should record the player's name and surname
- 2.6.5 The registration process should record the player's place of residence
- 2.6.6 The registration process should record the player's valid email address
- 2.6.7 The email address should be checked against existing emails for the purpose of not allowing the utilization of the same email twice
- 2.6.8 The email address should be verified before applicants are considered registered and allowed to play
- 2.6.9 Players below the age of eighteen should not be registered (Estonian players below the age of 21 should not be registered)

- 2.6.10 The registration procedure should not register players, if a player with an identical name, and any other required player data field are identical. (for this purpose, white space should not be taken into consideration)
- 2.6.11 Players' passwords
 - 2.6.11.1 Only robust passwords should be accepted from players
 - 2.6.11.2 Players should be asked to input the password twice, for the purpose of confirmation
- 2.6.12 Players should be requested to acknowledge the Terms and Conditions
- 2.6.13 Registering players should have their details entered immediately in the players' database once all data requested has been verified
- 2.6.14 Deregistered players should not be in a position to logon again

2.7 Anti-Money Laundering Measures

- 2.7.1 Funds to be remitted to the same account from which funds originated, and procedures if not possible
- 2.7.2 The System should be in a position to flag a withdrawal, if the total accumulation of withdrawals equals or exceeds €2,330
- 2.7.3 The System should identify suspicious transactions related to money-laundering

2.8 Players' Accounts and Payment of Winnings

- 2.8.1 An account in relation to each registered player should be maintained
- 2.8.2 Funds from or on behalf of the player should be credited to this account
- 2.8.3 Funds owned by the Licensee to the player should be credited to this account
- 2.8.4 The System should not accept wagers from players whose funds at their credit with the Licensee do not cover the amount of the wager
- 2.8.5 A procedure that checks that the amount standing to players is covered by actual deposits in the player's bank account together with any money in transit towards the players should be in place
- 2.8.6 A procedure that caters for the remittance, to the player, or to the Authority if the player cannot be successfully contacted, of the balance standing in a player's account that has not recorded a transaction for thirty months, should be in place
- 2.8.7 The System should maintain an audit trail of adjustments to player funds
- 2.8.8 The System should be able to identify bonuses from real money

3 Player Protection

3.1 Contents of Homepage

- 3.1.1 The homepage should contain the registered name of the Licensee's company
- 3.1.2 The homepage should contain the address of the company's registered office
- 3.1.3 The homepage should contain the official number and date of issue of the License
- 3.1.4 The homepage should state that the Licensee's operations are regulated by the Authority
- 3.1.5 The homepage should display a warning of the addiction possibilities of gaming
- 3.1.6 The homepage should contain hyperlinks to the website of organisations specialized in helping problem gamblers and which are approved by the Authority
- 3.1.7 The homepage should contain hyperlinks to the rules of the games or betting offered and the procedures adopted by the Licensee for the registration of players
- 3.1.8 The homepage should contain the official Dynamic Seal of Authorisation issued by the Authority

3.2 Display of Player Account Balance

- 3.2.1 Games should, at all times, display on the screen an automatically updatable counter which shows the player's account balance

3.3 Indication of Currency

- 3.3.1 All amounts displayed relating to wagers and winnings should be quoted with the symbol of currency that the player is playing with

3.4 Information Available to Players

- 3.4.1 The System should be capable of providing players with a gaming transaction history
- 3.4.2 The System should be capable of providing players with a financial transaction history
- 3.4.3 The System must provide detailed information about each game
 - 3.4.3.1 The System must display the name of each game
 - 3.4.3.2 The System must communicate restrictions on play
 - 3.4.3.3 The System must provide instructions on how to play
 - 3.4.3.4 The System must provide a payable for all prizes and special features
 - 3.4.3.5 The System must display the player's current account balance
 - 3.4.3.6 The System must communicate the unit and total bets permitted
 - 3.4.3.7 The System must provide the rules of the game, which have to be printable and downloadable

3.5 Player Self-Protection Mechanisms

- 3.5.1 The System should provide an option for players to set a limit on the amount that may be wagered within a specified period of time
- 3.5.2 The System should provide an option for players to set a limit on the losses that may be incurred within a specified period of time
- 3.5.3 The System should provide an option for players to set a limit on the amount of time that may be played in any one session
- 3.5.4 The System should provide an option for players to exclude themselves definitely or indefinitely
- 3.5.5 The System should provide players who have self-imposed limits or exclusions to increase or revoke a limit, or revoking the exclusion or decreasing exclusion limits, however only after seven days after the Licensee has received such a notice
- 3.5.6 The System should provide players who have self-imposed limits or exclusions to reduce limits and increase the exclusion period immediately after such notice is received by the Licenses

- 3.5.7 The System should not accept a wager from a player contrary to a limit or exclusion set by players
- 3.5.8 The System should exclude from marketing mailing lists any players that have opted to self-impose limit/exclusions, until such limits/exclusions apply

3.6 Reality Check

- 3.6.1 An automatic reality should suspend play, at intervals of one hour
- 3.6.2 The automatic reality check should clearly indicate for how long the player has been playing
- 3.6.3 The automatic reality check should clearly should display the player's winnings/losses during such period of time
- 3.6.4 The automatic reality check should require the player to confirm that the reality check message was read
- 3.6.5 The automatic reality check should give the option to a player to either end the session or resume playing

3.7 Full Screen Games

- 3.7.1 Full screen games should at all times display a real clock
- 3.7.2 Full screen games should give the option to exit the game

3.8 Aborted and Miscarried Games

- 3.8.1 A Licensee shall take all reasonable steps to ensure that the Licensee's approved computer system enables a player whose participation in a game is, after he or she has made a wager, interrupted by a failure of the telecommunications system or a failure of the player's computer system that prevents the player from continuing the game, to resume, on the restoration of the system, his or her participation in the game that was interrupted as at the time immediately before the interruption.
- 3.8.2 "If a Licensee's computer does not enable a player to continue, after the restoration of the system, with a game interrupted by a failure of the telecommunications system or the player's computer system, the System should ensure that the game is terminated"
- 3.8.3 "If a Licensee's computer does not enable a player to continue, after the restoration of the system, with a game interrupted by a failure of the telecommunications system or the player's computer system, the amount of the wager should be refunded to the player"
- 3.8.4 If a game is started but miscarries because of a failure of the Licensee's computer operating system, refund the wagered amount and any accrued credit either directly to his account or else in an approved manner

3.9 Player Fraudulent Activity Detection

- 3.9.1 Collusion monitoring should be in place where such an activity is possible
- 3.9.2 Chip-dumping monitoring should be in place where such an activity is possible

3.10 Multiple Jurisdiction Operation

- 3.10.1 Gaming operations involving multiple jurisdictions should inform users of a change in jurisdiction upon entering and exiting the Maltese jurisdiction