



Enhanced Automated  
Reporting Platform for Online /  
Remote Gaming

## Foreword

Whilst recognising the success that the Maltese gaming industry enjoys today, particularly, the remote gaming segment, the Malta Gaming Authority (MGA) continuously focuses on the future sustainability and integrity of the industry as a whole whilst taking into consideration the specific features of each segment.

With success comes responsibility, and one of the critical responsibilities of the MGA towards the industry and its consumers is to ensure the effective governance and assurance of all aspects of compliance. Malta must continue to strive to be the first choice for gaming operations in Europe and must ensure that the appropriate and effective controls and processes are in place in order to support a continuously safe, secure and compliant industry. The ever increasing rate of global delivery and technological change brings with it new regulatory compliance challenges which must be addressed.

Technological change also offers opportunities that could facilitate and simplify both operators' compliance efforts and reporting by the MGA. Within this context the Malta Gaming Authority is considering the implementation of an Automated Reporting Platform for Online Gaming. The MGA's objective is to continue to improve on and simplify reporting processes by leveraging technology to further drive benefits to the industry in general, as well as to individual operators.

The MGA's objective is to consult publicly on issues that are industry relevant and that have a potential impact on operators. As such, the MGA wishes to involve all potentially impacted stakeholders in this consultation paper to obtain their views and perspectives on the possible impact of changes in technology or operational requirements for an enhanced automated reporting platform.

It is therefore inviting interested parties to participate in this consultation process in order to provide feedback into the decision making process.

We encourage you to consider the topics discussed in this document and we appreciate your response to the questions which we have listed in Appendix A of this document. Your contribution will greatly assist us in shaping the way forward.

We look forward to having your views and suggestions.

## Table of Contents

Foreword	i
1. Context	1
1.1 Introduction	1
1.2 Aims and Objectives	2
1.3 Pre-Consultation Activities	3
2. Proposal	3
2.1 Industry Context	3
2.2 Definition	4
2.3 Proposed Technology Architecture	4
2.4 Data Transfer Requirements and Frequency	6
2.5 Business Intelligence	7
3. Privacy, Security and Risk Management	8
4. Benefits and Costs	9
4.1 Benefits	9
4.2 Costs	11
5. Regulatory Framework	11
5.1 Legislation	12
5.2 Regulations	13
5.3 Directives	13
6. Consultation Process	13
6.1 Period	13
6.2 Consultation Questions	13
6.3 Queries	14
6.4 Transparency	14
6.5 Post Consultation	14
6.6 Data Protection Statement - Data Protection Act (Chapter 440)	14
Appendices	i
Appendix A: Definitions	i
Appendix B: Acronyms	ii
Appendix C: Full list of Consultation Questions	ii

## 1. Context

### 1.1 Introduction

Over the last decade, since the enactment of the Lotteries and other Games Act, and the Remote Gaming Regulations subsidiary to it, Malta has attracted hundreds of remote gaming companies to our shores. There are number of success stories of which the Malta Gaming Authority (MGA) is proud of, not least the high compliance performance level attained by Malta licensees in spite of its significant industry size both in terms of the number of active player accounts held and the volume of transactions passing through Malta.

Whilst recognising the successes that the industry enjoys today, the MGA strives to continue to focus on providing regulatory certainty and ensuring the sustainability, integrity and compliance of both the industry and the Maltese jurisdiction. The MGA believes that integrity and compliance improve the industry's success potential and facilitate its access to new markets and new technologies. These are becoming ever more important with the increasing rate of global change, emergent markets and technologies, and the evolving regulatory landscape in Europe and beyond.

The MGA's supervision of its licensed operators today is performed through various processes in place that depend on submissions made by the operators, physical checks conducted by MGA officials or its approved auditors of the physical infrastructure located in Malta and abroad, and through ad hoc data download requests. The processes and timelines by which operators must adhere to and the frequency of regular and ad hoc requests for information made by the MGA are often criticised of being overly burdensome, laborious, and which, at times, lead to delayed compliance which hinders both the operators' and the MGA's performance.

It is for these reasons that the MGA has been studying and considering the adoption of an Enhanced Automated Reporting Platform (EARP).

The MGA's objective is to continue to improve on compliance by leveraging technology to simplify its reporting and compliance processes and drive further benefits to the industry in general and the operators in particular. It is essential that the MGA be equipped with state of the art tools that will allow it to fulfil its governance functions in the most effective and efficient way. The focus of this specific consultation paper is indeed on a proposed Enhanced Automated Reporting Platform (EARP) for Remote / Online Gaming. The primary objective for an EARP for Remote (Online) gaming operators is to support the functions of both the MGA as well as the operators in the industry as they continue to develop. By connecting with and understanding the core issues in this industry and assessing the risks affecting both players and operators alike, the MGA intends to use the knowledge to facilitate enhanced compliance (including processes), player protection and improved productivity for all stakeholders.

The MGA believes that calling on the industry to provide input and feedback on this topic will not only assist the MGA to better understand the benefits to the operators and the industry in general, but also to understand the expected implications on the operators. The MGA is also interested in understanding the technology implementations currently in place among the various stakeholders in order to factor this information into its future decision making on

the options available and the various possible implementation approaches. The MGA is also interested in obtaining feedback on the proposed technology architecture, the data reporting requirements and the potential risks associated with such systems. Most importantly, through this consultation paper and the feedback it receives, the MGA intends to shape its requirements for the selection of the proposed solution.

The MGA feels strongly that before making any decisions or recommendations in this area, it should carry out a more in-depth and wide-ranging public consultation with regard to the impact that enhanced reporting will have on the industry. It is therefore inviting interested industry stakeholders and the public at large to participate in this consultation process in order to provide feedback into the decision making process.

The MGA believes that it is through efforts such as these that Malta can continue to attain its objectives for the sector.

## **1.2 Aims and Objectives**

Today the MGA relies solely on information submitted by the operators using reporting processes that are often manual or produced on an ad-hoc basis, often resulting in incomplete or potentially outdated data. The MGA is looking to enhance the industry's reporting processes, and its own reporting processes by fully leveraging the data and technologies available in the market. Without a stronger level of automation in place, the MGA is currently unable to monitor the operators' state of compliance in a timely manner and at a deeper level resulting in potential risks to players and operators. This can result in a lack of confidence in the jurisdiction's regulatory standing and could impact the local industry as a whole. To protect the industry, especially the operators and players, these risks need to be mitigated with improved reporting processes and systems. Leaving the situation 'as is' is unsustainable and may impact the growth and long-term viability of the industry and the jurisdiction.

Currently several remote gaming operators already have systems in place to manage and monitor gaming data, and the MGA intends to leverage data from these systems where available. As such, the implementation of an EARP may not be disruptive to the operator, and the regulatory and other benefits to the industry and individual operators may outweigh any potential effort and cost to implement such tools. Through the implementation of the EARP the Authority is seeking to:

- Increase effective player protection;
- Streamline current reporting and compliance processes;
- Reduce the complexities in investigations;
- Reduce the manual effort for both the operator and the MGA;
- Support an increase in industry productivity and efficiency, including faster turnaround of queries and investigations;
- Provide timely analytics for both the MGA and the operator in support of decision making;
- Establish a transparent process between the operator and the authority;
- Provide improved data and reporting on the industry and its verticals;
- Strengthen its compliance performance framework through the availability of timely and automated data analysis;
- Enhance the industry standing and reputation.

### **1.3 Pre-Consultation Activities**

In 2014 the MGA conducted preliminary research into the possible options and implications of an Enhanced Automated Reporting Platform (EARP). Specifically it reviewed the following:

- The current legislation that directly relates to enhanced reporting;
- The nature of data to be collected;
- An assessment of Industry Best Practice in other jurisdictions;
- Options available on the market today, and the technical implications of such a system;
- A full cost benefit analysis.

## **2. Proposal**

### **2.1 Industry Context**

Malta is regarded as one of the most experienced remote gaming jurisdictions in the world and the MGA's ambition is to excel further in the governance of this sector. The objective is to continue to steer Malta to be the leader in the field. To this end, the MGA is constantly reviewing all aspects of the jurisdiction in order to effectively continue to raise the bar in areas of regulatory, technology infrastructure and automation, reporting and business intelligence, research on consumer protection and regulation of new games, as well as operating standards for raising the overall standards of the operators licensed and regulated by the MGA.

As evidenced from previous years, the Maltese licence offers value beyond the operational elements. International brands have recognised this and have leveraged the licence to their advantage. The Maltese jurisdiction has become synonymous with quality in the industry, and operators look to quality to be associated with their business. Quality also offers additional recognition with investors, shareholders and banking institutions.

Malta prides itself for hosting a considerable number of the world's largest online casinos, bingo platforms, and sports books. This success can be directly attributed to the way Malta introduced a complete regulatory framework for Remote Gaming in 2004 – the first European state to do so.

However, with success comes responsibility, and one of the most important responsibilities to the industry and its consumers is the effective governance and assurance of all aspects of compliance within the evolving operational environment as briefly outlined in the 'Introduction' section of this document. Enhanced reporting mechanisms will have direct benefits to the industry in general as well as its individual operators.

The MGA believes that it can leverage technology further to improve on and standardise its processes to ensure stronger governance around compliance and to make the overall processes between the operator and the MGA more efficient. It firmly believes that with the rapid growth of the industry, the significant changes in technology, industry structure, and the international nature of the business, more can be done in this area.

## Questions related to Industry Context

- Q1.** Do you agree that in order for Malta to remain a significant jurisdiction for setting up gaming operations, the MGA must enhance its supervision capabilities to improve enforcement and compliance?
- Q2.** How do you relate to the need for gaming industry risks to be addressed through Enhanced Automated Reporting?

## 2.2 Definition

The Enhanced Automated Reporting Platform will include a defined methodology that outlines the approach; the frequency of updates, the level of data and the required reporting formats. Through the EARP the MGA will introduce a regular data feed from operators from which summarised financial, game, and player activity will be monitored and analysed to determine compliance with the regulatory framework. This system, once fully operational will replace the manual monthly, six-monthly and annual reporting processes currently in place.

The system for enhanced automated reporting will:

1. Ensure that the data in the operator's replicated vaults (see Figure1) is controlled, 'sealed' and certified;
2. Automate Reporting from the operator's vaults to the MGA's Platform, which could include daily or monthly extracts;
3. Store normalised financial, game, and player data in a secure and robust environment for timely reporting of operator and player activity;
4. Provide data reporting for analytical purposes at industry level.

## 2.3 Proposed Technology Architecture

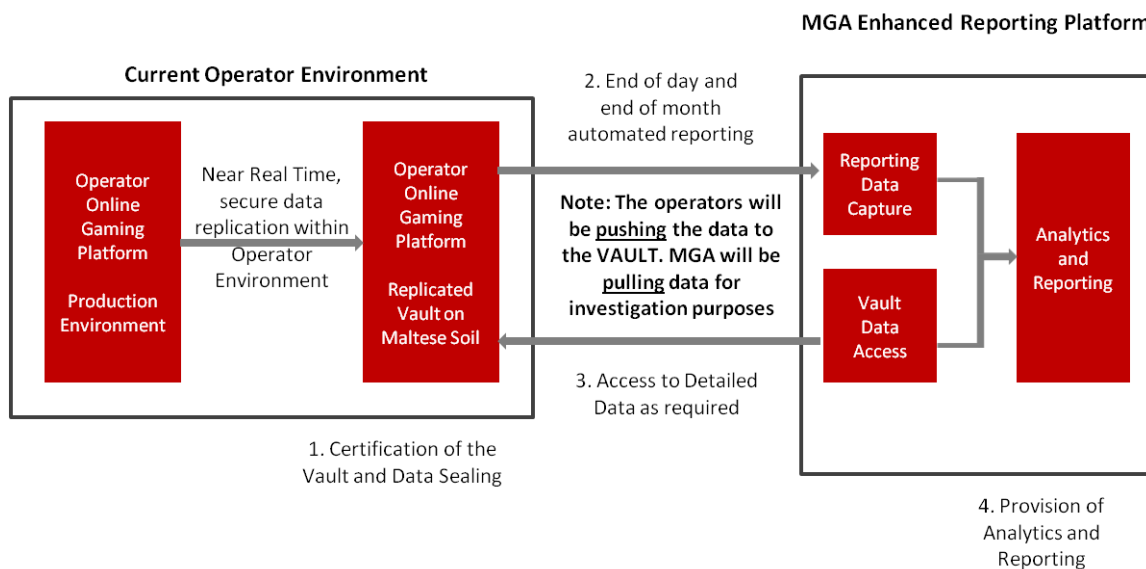
The MGA is envisioning a centralised platform which will be hosted by the MGA and which will obtain a pre-defined subset of data from the operator's managed system/s at pre-established timeframes via secure links by means of pre-defined API's .

In addition, the Enhanced Automated Reporting Platform will establish a defined set of operator requirements for the replicated vaults (refer to Figure 1), which will include a process of certification. The data in the operator's replicated vault will be stored securely via a process of data 'sealing'. The operator will be responsible for the implementation and operation of its replicated vault. The MGA will have access to the 'sealed' data remotely over a secured link and will receive data on a regular basis through its central reporting platform.

Figure 1 below is an illustration of the proposed architecture for the EARP and its interaction with the operator's systems with numbered items 1 through 4 being the new aspects of the EARP.

These are:

1. Processes and requirements for the certification of the Operator’s Secure Replicated Vault. These include requirements for secure transmission of data via https and / or SFTP; requirements around data transfer, location and format for data storage, as well as includes requirements around data retention, access and usage;
2. Requirements for daily ‘end of day’ reporting as well as ‘monthly reporting’ as per section 2.4 below;
3. Access limited strictly to the MGA to detailed data in the Operator’s Replicated Vault as and when required via predefined access rights;
4. Implementation of an MGA data warehouse for analytics and reporting. Aggregated data from this data warehouse can also be made available to the industry and the operators.



**Figure 1**

The MGA recognises that many operators already have solutions in place that have been developed or acquired for their internal operations as well as established replication environments as currently required by the MGA. To this end, the technical implementation for the online EARP will fully leverage these environments with the objective of minimising the implementation impact on the operator. The MGA intends to leverage both the current replicated environments as well as the aggregated data already available to provide data to the MGA EARP. The MGA will also be implementing interfaces to those systems on the basis of industry standard that are available on the market.

From information obtained through research and assessment, the MGA has been given reasonable technical assurances by experts that integration with other proprietary systems is also possible through the implementation of a common interface.

Data that is transferred to the EARP will be in a predefined format, and will be transferred over secure transmission protocols.

The operators will be accountable for managing and maintaining their own respective production and replicated vault environments and will be responsible for their certification. It is envisioned that there will be a ‘one time’ set-up cost to establish the data transfers and



connections and to certify the environment. A mandatory re-certification of the replicated vault will also be required on a regular basis or when major changes occur within the said system.

### Questions related to the Proposed Technology Architecture

- Q3.** What are your views on the above technical architecture of the Enhanced Automated Reporting Platform (EARP)?
- Q4.** Do you currently have a system in place to monitor online gaming data? If yes, please elaborate on the nature of your system and provide the system name where applicable?
- Q5.** Does your current system have capability to export data for reporting purposes?
- Q6.** Do you currently have a replicated vault in place? If yes, please elaborate on the ability for this replicated vault to be sealed and certified?

## 2.4 Data Transfer Requirements and Frequency

The MGA EARP will be managed by the MGA and the information envisioned to be required to be sent from the operator to the MGA on a regular basis will be comprised of three main aspects:

1. **Player data**, such as:

- Player ID, IP address, nationality, birth date or age, country, cumulative total deposits/withdrawals, limits, first date played, last date played, last login date, self-barring;
  - It is envisioned that player data is to be transferred once a month, where one record per player with the key player attributes is to be transferred.

2. **Financial data**, such as:

- Player Liability data, month-end financial totals, month-end gross gaming revenue, end-of-day book balances, funds in transfer;
  - It is envisioned that financial data is to be transferred once a month, in a normalised manner, whereby key financial attributes are to be transferred.

3. **Game data**, such as:

- Daily game data as well as product and betting data. End of day data can include: summary data by games category and currency, number of sessions by game, number of hours by game, total stakes, daily withdrawals, and random number generators. In addition, data may include jackpot data, ring game data, single player data as well tournament data and betting data as applicable;

- It is envisioned that an aggregate of game data is to be transferred once a day, in a normalised manner, whereby key game attributes are to be transferred.

### Questions related to the Data Transfer Requirements

- Q7.** What are your views about the scope of data transfer requirements? Would you recommend any changes in data transfer requirements?
- Q8.** What are your views on the frequency of the data transfer requirements? Would you recommend any changes in frequency?
- Q9.** Does your current system have a capability to export data for reporting purposes?
- Q10.** Is the player data listed above available for export from your current systems?
- Q11.** Is the game data listed above available for export from your current systems?
- Q12.** Is the financial data listed above available for export from your current systems?
- Q13.** Do you have any overall concerns or feedback on the data transfer requirements?

## 2.5 Business Intelligence

Business intelligence is an important aspect of the system, which will be implemented using high-end reporting and analytical tools. This presents an immediate opportunity to the operator through the ability to access and analyse aggregated industry data as well as his individual operator data which can be provided back to the operator providing insights and trends as an added value. Individual operator data will only be provided at a detail level to the specific operator providing the data; however industry data at an aggregated level can be provided to all contributing operators.

Summarised business data may be provided through a business intelligence portal of the central reporting platform that could provide essential information to assist the operators better understand their business in comparison to the industry for decision making.

### Questions related to Business Intelligence

- Q14.** Would you be interested in obtaining aggregated 'Industry' business intelligence data from the EARP?
- Q15.** What type of data / reports would you be interested in obtaining from the platform?
- Q16.** Would you be interested in obtaining data specific to your operations from a centralised reporting platform?
- Q17.** If you are interested in additional reporting and analytics, can you please elaborate on the nature of reporting and analytics required?

### 3. Privacy, Security and Risk Management

The MGA recognises that with the introduction of automated electronic transfers of player, financial and game data, security and data protection requirements are paramount.

As a result the MGA is preparing to implement a system with a feature set to include:

- Strong user authentication mechanisms;
- High levels of transactional security and transaction traceability;
- Secure transmission of data between the operator systems and the MGA using secure file transfer protocols;
- Secure and as required encrypted storage of data at the designated MGA hosted site;
- Data protection and confidentiality, so that shared data is only provided at an aggregated level, based on industry data protection laws.

The system will be scalable in order to facilitate handling of the operational requirements from diverse operators irrespective of their size. The system will provide added value in its provisioning of reliability, timely reporting, facilitated access and reporting capabilities.

From a technical and security operations perspective, a number of risks are being considered however the effectiveness of their mitigation via embedded controls will be measured during selection of the final solution and will be addressed during implementation. The following risks will be evaluated during the selection process and will be addressed during implementation:

- Data loss;
- Transfer interceptions;
- Data tampering and manipulation;
- System unavailability and downtime;
- Vulnerability patching.

The MGA will undertake a continuous risk-based approach through which security and privacy issues will be mitigated proactively.

#### Questions related to Privacy, Security and Risk Management

**Q18.** From your perspective as an operator, are there any additional risks not listed above that you are already addressing or seek to address; and how will these risk mitigation efforts influence your implementation of an EARP?

**Q19.** Are you aware of any constraints that, in themselves, create risks to the implementation of a centralised EARP?

## 4. Benefits and Costs

### 4.1 Benefits

The MGA's objective is to establish a solution where the operators and the MGA will both benefit from an enhanced reporting platform.

The following is a list of the anticipated benefits:

#### 1. Enhanced compliance reporting processes:

- a) The MGA will not be dependent on manual submissions by operators to provide regular and ad hoc reports;
- b) Reporting would no longer need to rely on inspections and physical presence, often dependent on third parties visiting various locations;
- c) Faster response times when player issues arise or heightened or new risks emerge;
- d) A proactive and timely approach will be in place rather than reactive interventions.

#### 2. Resource optimisation:

- a) Efficiencies within the operator organisations as reporting can be automated and the operator will not need to provide data on an ad hoc basis for inspections, audits and compliance checks;
- b) Efficiencies within MGA with respect to the processing of data;
- c) Resources from both parties will be released from having to fulfil manual, ad-hoc and/or follow up requests;
- d) Physical inspections, when necessary, can be focused on the critical areas.

#### 3. Process Integration and Automation:

- a) Streamlined processes between the MGA and the operators.  
The EARP would not require a high level of support from the operators and the MGA.

#### 4. Regulatory and asset assurance

- a) Enhanced governance;
- b) Health-checks of online gaming platforms will be ongoing;
- c) The ability to continuously verify the integrity of physical assets.

#### 5. Player protection process:

- a) Timelier handling of player complaints within the timeframes prescribed by law;
- b) An increase in player interaction capabilities;
- c) Improved service provider efficiency;
- d) Better customer service;
- e) Increased customer confidence;
- f) More satisfied clients.

**6. Enforcement and regulatory compliance:**

- a) The need for frequent physical inspections or presence will be reduced;
- b) Regulatory compliance will be simplified for the operator through a standard set of reporting requirements;
- c) The data in the current replicated vaults will be leveraged and utilised;
- d) System efficiencies will be improved;
- e) Process integrity will be assured.

**7. Revenue assurance:**

- a) Operators will have access to industry trends;
- b) The burden for preparation of the monthly liability report will decrease considerably - MGA will have the data it requires for financial computations;
- c) Erroneous submissions due to human input error will be eliminated;
- d) Early warning of fraud attempts and theft from human activity and malfunctioning equipment.

**8. Operational efficiencies and improvements:**

- a) A reduction of burden required in the initial stages of an investigation or audit;
- b) A steep reduction of total man hours required for extracting data.

**9. Reporting and insight:**

- a) Analytics and trending data with respect to the industry will be available.

**10. Security and Data protection**

- a) The manual submission or data dumps will be replaced with the implementation of industry grade encryption and secure data communication transfers;
- b) Sensitive information will be protected at all times;
- c) Authentication and verification of data submissions;
- d) Detail logging of system events;
- e) Integrity assurances through data protection against modification.

**Questions related to Benefits**

**Q20.** What, in your views, are the direct benefits to your organisation, and/or the industry, through the introduction of an EARP?

**Q21.** Do you share the MGA's view in terms of the direct benefits to you as an operator through the introduction of an EARP?

**Q22.** Do you believe that the anticipated benefits can be converted to tangible benefits for operators and the regulator alike?

- Q23.** Do you agree that a higher quality operation, contributes to better recognition of the value of a Maltese licence with banking or financial institutions, stakeholders in general, and investors?
- Q24.** What are your views about the MGA not yet having a proper central reporting system?
- Q25.** In your opinion, how cumbersome is the current reporting process to the operator in terms of resource man-hours, technical complexities and investigation requirements?
- Q26.** How effective are the current analytical and reporting capabilities between the operators and the MGA?
- Q27.** Do you share a common view with the MGA about potential efficiency gains to be achieved?
- Q28.** Which are the benefits that will have most impact to your business?

## 4.2 Costs

It is anticipated that the costs for the EARP will be shared. Currently, the operator is responsible for its production environment as well as its replicated vault in Malta. It is anticipated that the incremental costs to be borne by the operator are three fold:

1. The implementation of the interfaces between the operator's replicated vault and the MGA central reporting platform;
2. The certification of the replicated vault based on the requirements as set out in the enhanced reporting framework. Of note is that the MGA will be leveraging current industry models and systems in place, in order to minimise the impact on the operator;
3. The re-certification of the replicated vault, either when changes to the vault are made and/or on a regular basis.

### Questions related to Costs

- Q29.** Do you share a common view with the MGA about potential cost model? If not, please elaborate on your perception of the anticipated costs?
- Q30.** Which are the additional costs that you may foresee that can impact your business?
- Q31.** Do you currently undergo a certification process for other jurisdictions? If yes, do you anticipate that your costs can be mitigated by leveraging these certification processes?

## 5. Regulatory Framework

The remote gaming sector of Malta is regulated mainly by the Remote Gaming Regulations that are subsidiary to the main Act regulating all forms of gaming, the Lotteries and other Games Act (Chapter 438 of the Laws of Malta).

Malta's online gaming regulatory regime is based on the fair, responsible, safe and secure provision of gaming services and seeks to ensure that the three main pillars of gaming,

namely (i) the fairness of games, (ii) the protection of minors and vulnerable persons and (iii) the prevention of crime, fraud and money laundering, are secured as much as possible.

Although the current regulatory regime aims to be both technology and game neutral – encompassing any type of gaming using a means of distance communication; the advances made since it was adopted in 2004 in both technology, market structure, channels and regulatory environments have compelled Malta to undertake a complete overhaul of the regulatory regime. The Government and MGA aim to adopt, in the course of 2016 - 2017, a new and comprehensive framework that provides for wider and more effective governance of the sector allowing for simplified, evidence and performance based regulatory mechanisms. The MGA's objective for the proposed EARP, as an enhanced reporting tool, is to reduce the burden and standardise the process of reporting through automation, which enhances timeliness and effectiveness of its supervisory functions while adding value to regulatory performance of the operators and the Malta based industry as a whole.

While the MGA believes that it has the necessary legal basis in the RGRs to implement the EARP as foreseen in this document, it will be proposing to Government to implement an amendment to the Regulations to provide more clarity and sound basis for its implementation. This amendment is envisaged to be adopted and come into force during Q2 of 2016.

The documents in the regulatory framework that are relevant to this consultation are:

## **5.1 Legislation**

### **1. Lotteries and Other Games Act**

a) Regulates:

- i) Remote gaming;
- ii) Bingo games;
- iii) Tombola games;
- iv) Sports betting;
- v) Racecourse betting;
- vi) National Lottery;
- vii) Other lotteries (including the non-profit);
- viii) Gaming devices located outside of casinos;
- ix) Amusement machines.

### **2. Data Protection Act**

### **3. Prevention of Money Laundering Act**

### **4. Prevention of Corruption (Players) Act**

## 5.2 Regulations

5. Cash Controls Regulations
6. Remote Gaming Regulations (S.L. 438.04)
  - a) Remote (online) casino-type games;
  - b) Poker networks;
  - c) Remote betting.

## 5.3 Directives

7. Directive on Inactive Accounts
8. Registration of Players Directive 2011
9. Players' Liability Reporting Directive 2012

### Questions related to Regulatory Framework

- Q32.** What are your views about the adequacy and clarity of the current regulatory framework with regard to licensee's compliance reporting?
- Q33.** Do you recognise a need for any change to the legislation and, or regulations in order to implement the proposed EARP, and what change could this be?

## 6. Consultation Process

The following is the relevant information about the consultation process, key dates and the process to forward queries to the MGA during the consultation period.

### 6.1 Period

The MGA will allow a total period of eight (8) weeks for the public consultation which will be set as follows:

**OPENING DATE OF CONSULTATION:** Wednesday, 21 October 2015

**CLOSING DATE OF CONSULTATION:** Wednesday, 16 December 2015 at 16:00h

### 6.2 Consultation Questions

The MGA is keen to seek the input of stakeholders in Malta and abroad and has set out a series of questions throughout this document which should be addressed by contributors. Appendix A contains the consolidated list of the consultation questions. Please respond to



as many questions as possible and provide supporting information where required and provide examples where applicable. Kindly use the question numbering in your responses.

The MGA is open to all types of responses, and other comments on the MGA's position and proposals are welcome.

### **6.3 Queries**

The MGA has set up a dedicated electronic mailbox for the purposes of this consultation. The MGA will receive queries and requests for clarifications that contributors may have in respect to the contents of the paper and proposals, and contributions/feedback from interested parties on the following email address: [consultations.mga@mga.org.mt](mailto:consultations.mga@mga.org.mt)

All queries will be acknowledged in writing within two (2) working days from receipt.

**Note:** The MGA will consider only those contributions which clearly identify the originator of the contribution, contact information, and a clear statement of which interest they represent.

### **6.4 Transparency**

The MGA will maintain a register containing details of all contributions received. This register will be published on the MGA's website following the closing date of the consultation. The following information will be published in the register; names of respondents, and all related documents and individual contributions.

The MGA will consider contributions which include a request for anonymity on a case-by-case basis. However, for such requests to be considered, they must include a clear indication of the interest group which the contributor represents/belongs. Where such requests will be granted, the contributors information will be anonymised and will clearly indicate the stakeholder/interest group.

The MGA will ensure that any data that is confidential to the Operator's environment or business is kept confidential at all times and will not be disclosed in the consultation reports.

### **6.5 Post Consultation**

The MGA will consider all responses carefully when finalising its proposals, but will only alter its position if it believes there is a sound basis to do so. Following the end of the consultation the MGA will prepare a summary of responses, which it will publish alongside the finalised documents.

### **6.6 Data Protection Statement - Data Protection Act (Chapter 440)**

As part of this consultation, individuals are invited to forward their recommendations, views and opinions which will enhance the process. We intend to collect the following information: name of the organisation or individual responding to the consultation, the contact details of the individual (e-mail and telephone number). The contact details provided will enable us to contact the person to clarify their contributions – if the moderator of this consultation needs to seek such clarifications.

The recommendations will be analysed and placed, in full or in part, on the MGA website after the consultation has been concluded. The comment of the organisation or the individual will be accompanied by the 'Display Name' as listed at the time when the comment was entered by the individual. If an individual chooses to have his name removed from the comments, the moderator will categorise these comments according to the following stakeholders' list:

- Remote Gaming operators;
- Industry representative bodies;
- Industry experts;
- Sector associates or stakeholders;
- Citizens;
- Others.

The personal data collected will be processed by the people involved in the consultation process according to the provisions of the Data Protection Act (Cap 440) and will not be accessed or disseminated to third parties.

Contributors may request for modification or deletion of their submitted contribution to this consultation process, by sending their request via e-mail to: [consultations.mga@mga.org.mt](mailto:consultations.mga@mga.org.mt)

In addition, please be aware of:

- Disclosure under the Freedom of Information Act (Chapter 496)

As we are a public authority all documents we hold, including documents related to this public consultation process, may be released following a request to us under the Freedom of Information Act (Chap. 496), unless such request may be subject of an exemption arising from the same Act.

## Appendices

### Appendix A: Definitions

<b>Data Sealing</b>	A process to digitally seal data records to ensure integrity and authenticity. The sealed data records are made available to the regulatory authority online for control purposes via the replicated vault.
<b>Enhanced Automated Reporting Platform (EARP)</b>	Enhanced Automated Reporting Platform (EARP). A central computer system that obtains data from Operators' systems on a regular basis to report and provide analytics on operator activities for the purpose of reporting.
<b>Financial data</b>	Any data pertaining to the financial activity of a player.
<b>Licensee</b>	As per the definition of licensee in Remote Gaming Regulations 2004, SL438.04.
<b>Player information</b>	Any data which contributes or may contribute to the identification of a player.
<b>Game data</b>	Any data which contributes or may contribute to the game activity of a player.
<b>Compliance</b>	Compliance is a term describing the conformance requirements for meeting the standards of the regulatory framework.
<b>Compliance reporting</b>	Compliance reporting is a set of rules designed for assurance of compliance to regulatory standards. It involves a defined methodology which comprises the approach, frequency of updates, desired reporting output and overall validation of the rules.
<b>Normalised data</b>	Data that has been simplified in its structure in order to transmit a subset of data in a standard format.
<b>Operator</b>	An economic operator registered in Malta and licensed, or in the process of obtaining a licence, to operate as a Gaming Operator in accordance to the Gaming Regulations.
<b>Regulatory framework</b>	A combination of legislation, regulations and directives set to facilitate comprehension of individual requirements needed to meet the compliance standards.
<b>Replicated vault</b>	A near real time replication of the production data, owned and managed by the Operator on Maltese soil in accordance with the laws of Malta.

## Appendix B: Acronyms

<b>MGA</b>	Malta Gaming Authority
<b>AML</b>	Anti-money Laundering
<b>API</b>	Application programming interface

## Appendix C: Full list of Consultation Questions

### Questions related to Industry Context

- Q1.** Do you agree that in order for Malta to remain a significant jurisdiction for setting up gaming operations, the MGA must enhance its supervision capabilities to improve enforcement and compliance?
- Q2.** How do you relate to the need for gaming industry risks to be addressed through Enhanced Automated Reporting?

### Questions related to the Proposed Technology Architecture

- Q3.** What are your views on the above technical architecture of the Enhanced Automated Reporting Platform (EARP)?
- Q4.** Do you currently have a system in place to monitor online gaming data? If yes, please elaborate on the nature of your system and provide the system name where applicable?
- Q5.** Does your current system have capability to export data for reporting purposes?
- Q6.** Do you currently have a replicated vault in place? If yes, please elaborate on the ability for this replicated vault to be sealed and certified?

### Questions related to the Data Transfer Requirements

- Q7.** What are your views about the scope of data transfer requirements? Would you recommend any changes in data transfer requirements?
- Q8.** What are your views on the frequency of the data transfer requirements? Would you recommend any changes in frequency?
- Q9.** Does your current system have a capability to export data for reporting purposes?
- Q10.** Is the player data listed above available for export from your current systems?
- Q11.** Is the game data listed above available for export from your current systems?

**Q12.** Is the financial data listed above available for export from your current systems?

**Q13.** Do you have any overall concerns or feedback on the data transfer requirements?

### Questions related to Business Intelligence

**Q14.** Would you be interested in obtaining aggregated 'Industry' business intelligence data from the EARP?

**Q15.** What type of data / reports would you be interested in obtaining from the platform?

**Q16.** Would you be interested in obtaining data specific to your operations from a centralised reporting platform?

**Q17.** If you are interested in additional reporting and analytics, can you please elaborate on the nature of reporting and analytics required?

### Questions related to Privacy, Security and Risk Management

**Q18.** From your perspective as an operator, are there any additional risks not listed above that you are already addressing or seek to address; and how will these risk mitigation efforts influence your implementation of an EARP?

**Q19.** Are you aware of any constraints that, in themselves, create risks to the implementation of a centralised EARP?

### Questions related to Benefits

**Q20.** What, in your views, are the direct benefits to your organisation, and/or the industry, through the introduction of an EARP?

**Q21.** Do you share the MGA's view in terms of the direct benefits to you as an operator through the introduction of an EARP?

**Q22.** Do you believe that the anticipated benefits can be converted to tangible benefits for operators and the regulator alike?

**Q23.** Do you agree that a higher quality operation, contributes to better recognition of the value of a Maltese licence with banking or financial institutions, stakeholders in general, and investors?

**Q24.** What are your views about the MGA not yet having a proper central reporting system?

**Q25.** In your opinion, how cumbersome is the current reporting process to the operator in terms of resource man-hours, technical complexities and investigation requirements?

**Q26.** How effective are the current analytical and reporting capabilities between the operators and the MGA?

**Q27.** Do you share a common view with the MGA about potential efficiency gains to be achieved?

**Q28.** Which are the benefits that will have most impact to your business?

**Questions related to Costs**

**Q29.** Do you share a common view with the MGA about potential cost model? If not, please elaborate on your perception of the anticipated costs?

**Q30.** Which are the additional costs that you may foresee that can impact your business?

**Q31.** Do you currently undergo a certification process for other jurisdictions? If yes, do you anticipate that your costs can be mitigated by leveraging these certification processes?

**Questions related to Regulatory Framework**

**Q32.** What are your views about the adequacy and clarity of the current regulatory framework with regard to licensee's compliance reporting?

**Q33.** Do you recognise a need for any change to the legislation and, or regulations in order to implement the proposed EARP, and what change could this be?