

Request for Information and Alerting Manual

Malta Gaming Authority



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Acronyms

RFI	Request for Information
B2C	Business-to-Consumer
MGA	Malta Gaming Authority
LRMS	Licensee Relationship Management System
SBI department	Sports Betting Integrity department
B2B	Business-to-Business
SBRM	Suspicious Betting Reporting Mechanism

1 Introduction

The Request for Information (RFI) and Alerting system is to be used by the MGA to communicate all RFIs and Alerts with Business to Customer (B2C) and Business to Business (B2B) operators who offer sports betting. The RFI and Alerting system shall be accessed through the Malta Gaming Authority (MGA) portal i.e. the Licensee Relationship Management System (LRMS), that is already shared with all licensees.

The aim of this document is to provide guidance on how one can make use of the system. Even though the system is a user-friendly one, this document shall act as a point of reference to any queries accordingly.

2 The RFI and Alerting system

The SBI department is made aware of suspicious betting activity via the Suspicious Betting Reporting Mechanism (SBRM). The Suspicious Betting Reporting Requirements, as highlighted in article 43 of the *Gaming Authorizations and Compliance Directive* (Directive 3 of 2018), oblige B2C and B2B licensees who offer betting on sporting events to inform the Authority of the suspicious activity recognised. This article also obliges these B2C and B2B licensees to also inform the Authority of any circumstances that may lead to one or more bets being voided owing to suspicion of manipulation of the event to which they relate and shall provide any supporting documentation which the Authority may, on a case-by-case basis, reasonably require. Primarily, MGA-licensed B2C and B2B operators are to report suspicious activity via the SBRM available on the MGA portal.

With the Suspicious Betting Reporting Requirements in place, the Authority is able to monitor all the suspicious betting activity taking place within the remits of its Malta-licensed betting operators. Whilst recognising this responsibility, the Authority believes that in sharing information with its operators it can capitalise on the strong sense of collaboration that is already present and increase the chances of detecting suspicious betting behaviour.

Upon receiving a suspicious betting report indicating suspicious betting behaviour, or any other alert that may indicate potential manipulative behaviour surrounding an event, the Authority's SBI department analyses such report and evaluates the suspicious behaviour being noted. The SBI department also determines if further information is needed.

Furthermore, the SBI shares knowledge of such reports with its licensees without revealing the source of the information. The Authority expects that licensees are able to review the event in question and establish whether the information being provided by the Authority may reveal any new indications that were previously not noticed.

The Authority also expects that licensees are able to review (or re-review) the betting activity surrounding the event being indicated in the alert, as this will increase the odds of recognising any suspicious behaviour (if there is any). If suspicious betting is recorded by an operator after receiving an alert, then the suspicious event in question is to be reported via the SBRM. A deadline of a week is given

for operators to report suspicious activity after the alert has been corresponded. The Authority expects a reply to be submitted by the set deadline.

Furthermore, the SBI department receives an RFI from various investigating bodies, including regulatory authorities, police forces, sports governing bodies and other integrity units. In this regard, the RFI formulated by the SBI department is then corresponded with those licensees who offer sports betting. Such Alerts and RFIs will be corresponded via the RFI and Alerting System on the LRMS portal.

2.1 Email Notification

Once the SBI department submits a new RFI or Alert, the licensee will receive an automatic email notification informing the licensee that a new RFI or Alert has been submitted on the licensee's LRMS portal '*Company Timeline*'. All automatic email notifications are sent directly to the licensee's Key Compliance and Sports Integrity Team email address (if the relevant licensee has shared such team email address with the SBI department).

2.2 LRMS Portal Company Timeline

Upon logging into the LRMS portal, the persons replying must select the company which they are representing, and on behalf of which licensee they are providing their reply. A reply is expected to be submitted by the established deadline in the RFI or Alert. In both instances, a reply is expected to be submitted by the licensee. All replies are monitored, and if the licensee does not reply to a particular RFI or Alert, such failure to comply is also monitored. **Such request constitutes a 'regulatory instrument' in terms of Regulation 3 of the Gaming Compliance and Enforcement Regulations (S.L. 583.06). Consequently, and the failure to adhere to this request within the applicable timeframe may result in the appropriate enforcement action being taken.**

On the licensee’s company timeline, the licensee is able to access the newly submitted RFI or Alert.

Company Timeline

Today
Filter
?

20 Jul 23	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> ● B2B Compliance Report – July – 2023 Se7en Testing Company </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> 🕒 Due : 20 Aug 23 (Overdue) 📄 Last Edited :29 Aug 23 </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> Draft </div>
29 Aug 23	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> ● AML Compliance Review – 2022 Se7en Testing Company </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> 🕒 Due : 05 Sep 23 (Overdue) ✔ Submitted :01 Jan 01 </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> Deadline Exceeded </div>
31 Aug 23	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> ● B2B Compliance Report – August – 2023 Se7en Testing Company </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> 🕒 Due : 20 Sep 23 (Overdue) 📄 Last Edited :29 Aug 23 </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> Amendments Required </div>
18 Sep 23	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> ● Se7en Testing Company – Request for Information – SBIRFI02-01 Se7en Testing Company </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> 🕒 Due : 04 Oct 23 ✔ Submitted :18 Sep 23 </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> Submitted </div>
<div style="background-color: #333; color: white; padding: 2px 5px; border-radius: 5px; display: inline-block;">Today</div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> ● Se7en Testing Company – Request for Information – SBIRFI03-01 Se7en Testing Company </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> 🕒 Due : 03 Oct 23 📄 Last Edited :25 Sep 23 </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> Draft </div>
30 Sep 23	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> ● B2B Compliance Report – September – 2023 Se7en Testing Company </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> 🕒 Due : 20 Oct 23 ✔ Submitted :29 Aug 23 </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> Submitted </div>
31 Oct 23	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> ● B2B Compliance Report – October – 2023 Se7en Testing Company </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> 🕒 Due : 20 Nov 23 </div>	<div style="border: 1px solid #ccc; border-radius: 5px; padding: 5px; margin-bottom: 5px;"> Submitted </div>

The draft status indicates that a new RFI has been submitted and a reply has not yet been reported.

In order to view the RFI and submit a reply, one must select the report, and select ‘Open’ as seen below in **Step 1**.

25 Sep 23

Se7en Testing Company – Request for Information – SBIRFI03-01
Se7en Testing Company

🕒 Due : 03 Oct 23
📄 Last Edited :25 Sep 23

Draft

Revision History

No revision history

Open

Step 1

2.2.1 General

In section one, the Terms and Conditions of the RFI and Alerting system are visible. These must be read and understood thoroughly in order to continue to the next section.

[Home](#) > [Gaming Services](#) > [Suspicious Betting RFIs & Alerts](#)

SUSPICIOUS BETTING RFIS & ALERTS

1 General 2 Details 3 Enclosures

GENERAL

The 'Request for Information' Application (hereinafter referred to as 'the Application')

1 General Information

- a. The Authority is requesting its licensees to provide it with information subject to a set deadline, in accordance with its regulatory powers as set out in article 7 (2) (d) of the Act.
- b. The specific checks required are detailed within the request itself (by way of the details tab of this application) and may include a request for personal data pertaining to players. In such cases, disclosure to the Authority is necessary for the prevention or detection of crime and for reasons of substantial public interest.
- c. These checks must be carried out without tipping off the data subject, so as not to prejudice any investigations to which the request would be pertinent to.

2 General Terms and Conditions

- 2.1 For the purposes of these Terms and Conditions, the following words and expressions shall have the following meanings:

"Act" means the Gaming Act (Chapter 583 of the Laws of Malta);

"Alert" means a Suspicious Betting Activity Alert (SBAA);

"Authority" means the Malta Gaming Authority;

"Licensee" means the holder of a licence issued by the Authority;

"SBI" means the Authority's Sports Betting Integrity Department;

"SBRM" means the Authority's Suspicious Betting Reporting Mechanism;

"SGBs" means Sport Governing Bodies.

- 2.2 The Authority shall refrain from requesting personal data of accounts falling outside the scope of the Authority's licence.

Notwithstanding the above, licensees must still report to the Authority markets offered to customers in terms of the MGA licence when the activity deemed suspicious is attributable to accounts which are effectively serviced under a separate licence. Such reporting is essential as it empowers the Authority to effectively address queries from SGB's, enforcement bodies, and other sports integrity related stakeholders. This enables the Authority to direct these entities to the relevant regulator and be in a position to advise them on whether the event was actually deemed suspicious or not by any of its licensees.

- 2.3 The Authority acknowledges that B2B Licensees are not habitually in possession of personal data pertaining to players that would need to be reported to the Authority. However, the Authority may in certain cases request such licensees to submit details concerning one or more particular events within a set timeframe. The requested information shall include confirmation of any apparent indications of suspicious betting behaviour in relation to the particular event, the rationale for flagging the activity as such (where applicable), and any additional information that the entity may provide based on evidence and/or their expert opinion.

3 Submission Requirements

- 3.1 Submissions must be made in the English language.
- 3.2 If there is insufficient space to answer any question within the application, licensees are to supplement the information provided by way of a document attached in the "Enclosures" section to provide the required information. Such attachments should be referenced in the application accordingly.
- 3.3 The relevant betting data and any information related to the betting data shall be attached in the "Enclosures" section.
- 3.4 The Authority reserves the right to request additional information if deemed necessary.
- 3.5 Should the information provided in the application cease to be correct, or if there are any changes and/or updates effected to such information following the submission thereof to the Authority, the Licensee shall inform the Authority immediately.
- 3.6 B2C Licensees shall provide betting data in a spreadsheet file format (specifically ".xls") so that it may be viewed using Microsoft Excel. The data requested needs to also be provided in the order as is requested (for example, if the Request for Information requests the licensee to submit the First Name of Account Holder, Second Name of Account Holder, Date of Birth of Account Holder and Country Name, then these are to be displayed in the spreadsheet file in that order (displayed in rows)).
- 3.7 In the absence of any other direction being made, B2B Licensees are to provide details in a format that is considered most suitable.
- 3.8 If the data being corresponded is pertinent to a report already submitted via the SBRM, the Licensee shall notify the SBI department. The status of the corresponding report on the SBRM shall, in turn, be set to 'Amendments Required'. This will allow the Licensee to amend the report and upload the relevant betting data in the Enclosures section of the SBRM. Following such re-submission, the Licensee shall promptly notify the Authority thereof.

4 Reporting Protocol following an Alert

- 4.1 Licensees are required to review the event referenced by the Authority and consider whether any indications of suspicious activity can be noted in light of the information provided. As such, licensees are in such cases required to conduct a fresh review of the betting activity carried out in relation to the event indicated in the alert.
- 4.2 In cases where a licensee records suspicious betting activity after being notified of an Alert, the licensee shall report such event via the SBRM within one calendar week of such notification. Failure to abide by such deadline may result in appropriate enforcement action being taken.

5 Disclosure of Data

5.1 The Licensee acknowledges that by virtue of Article 6 (2) of the Act, the Authority may share any relevant data, including personal data, in its possession with local and, or foreign regulators entrusted with the governance and regulation of a particular sector, including law enforcement when such transfer of data is (i) considered by the Authority as a necessary measure in the public interest, and (ii) necessary for the process of detecting, preventing and investigating activities constituting a criminal offence in Malta, or in accordance with Maltese law, and the law of the country of the relevant foreign regulator.

Provided that the public interest requirement shall be deemed ipso jure satisfied where the transfer of data is required in relation to the process of detecting, preventing and investigating activities relating to any of the following offences:

- a. money laundering;
- b. terrorist financing;
- c. fraud, identity theft and misappropriation of funds;
- d. computer misuse; and
- e. manipulation of sports competitions;

Provided further that for the purposes of detecting, preventing and investigating the manipulation of sports competitions, the Authority may also share information, including any relevant personal data, with SGBs and other platforms whose function includes the detection of suspicious betting activities and, or are responsible to take action to prevent such manipulation of sports competitions from taking place, and with whom the Authority has signed a data-sharing agreement:

Provided further that all processing operations shall be in accordance with the applicable data protection legislation.

6 Data Protection

6.1 It is the licensee's responsibility to take the necessary steps to ensure that their systems are compliant with data protection legislation when providing such information to the Authority.

6.2 The personal data collected further to this Application shall be processed by the Authority in accordance with the relevant provisions of the General Data Protection Regulations (EU) 2016/679 ('GDPR').

6.3 Personal data shall be processed on the basis of article 6(1) (e) of the GDPR, in that the contact information is needed to properly fulfil the Authority's legal obligation to collect and process any information submitted pursuant to this Application in accordance with the Authority's exercise of official authority vested as Controller.

6.4 The Applicant may contact the Data Protection Officer of the Authority with any concerns or queries on the following e-mail address: dpo.mga@mga.org.mt. Moreover, the Authority's privacy policy which includes further information can be found on www.mga.org.mt/privacy-policy.



After reading the Terms and Conditions, the relevant licensee must select 'Next' as seen in **Step 2** above.

2.2.2 Details

In section two, the licensee is able to view the RFI or Alert details. Such details include the name of the report, the report type, the report ID, the report due date, and the report details. As seen in **Step 3** below, the licensee can scroll up or down to view the full details included in the RFI or Alert.

Home > Gaming Services > Suspicious Betting RFIs & Alerts

SUSPICIOUS BETTING RFIS & ALERTS

1 General ✓ 2 Details 3 Enclosures

Report Details

Report Name	Report Type *
Se7en Testing Company - Request for Information - SBIRFI03-01	RFI
Report ID	Report Due Date *
SBIRFI03-01	03/10/2023

Details *

Dear Sports Integrity Colleagues,

The Malta Gaming Authority is currently looking into potential suspicious betting activity relating to the below-mentioned event. In this respect, the Authority is kindly requesting to be informed if any suspicious betting activity was recorded on the below-mentioned event.

Event: A vs B
Date: 25/09/2023



Step 3

Comments

Add

Step 4

Commented By	Comment	Created On ↓
There are no records to display.		

Findings

Please select your reply: *

Step 5

As per **Step 4** above, the licensee is able to add comments, and also reply to any comments added by the SBI department. Furthermore, as indicated in **Step 5** above, the licensee must select the highlighted arrow to be able to select a reply accordingly.

Findings

Please select your reply: *

- No suspicious activity was recorded
- Suspicious activity was recorded; however, the relevant betting activity does not fall within the remit of the MGA licence
- Suspicious activity was recorded, and the relevant betting data is being corresponded

Depending on the report type, whether the report is pertaining to an RFI or an Alert, different options are visible to submit a reply accordingly. The licensee must select a reply prior to proceeding.

After selecting a reply, the licensee must select 'Next' to proceed (Step 6).

Findings

Please select your reply: *

No suspicious activity was recorded



2.2.3 Enclosures

In section three, the licensee may upload any documentation instructed to be included in the RFI or Alert accordingly. As per **Step 7**, 'Choose File' must be selected to browse the device for the necessary data. Furthermore, 'Upload' must be selected to upload such data on the portal as seen in **Step 8** below. To continue and submit the reply accordingly, 'Submit' must be selected (**Step 9**).

- 1 General ✓
- 2 Details ✓
- 3 Enclosures

ENCLOSURES

All correspondence must be submitted in English.

Kindly use the 'Enclosures' section to attach the relevant betting data and any information related to the betting data.

The Authority reserves the right to request additional information.

If there are any changes to the information submitted, it is the licensee's responsibility to advise the Authority immediately.

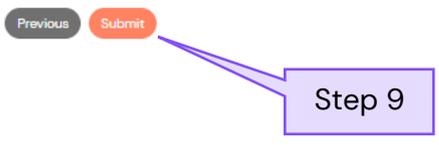
The Authority may in certain circumstances share any relevant data, including personal data, in its possession with local and/or foreign regulators entrusted with the governance and regulation of a particular sector, when such transfer of data is (i) considered by the Authority as a necessary measure in the public interest, and (ii) necessary for the process of detecting, preventing and investigating activities constituting a criminal offence in Malta, or in accordance with Maltese law, and the law of the country of the relevant foreign regulator. The Authority is empowered to do so in accordance with article 8(2) of the Gaming Act (Chapter 583 of the Laws of Malta). The Authority is also legally obliged to share information with competent law enforcement agencies, such as the FIAU and the Malta Police.

Provided that the public interest requirement shall be deemed ipso jure satisfied where the transfer of data is required in relation to the process of detecting, preventing, and investigating activities relating to any of the following offences:

- a. money laundering;
- b. terrorist financing;
- c. fraud, identity theft and misappropriation of funds;
- d. computer misuse; and
- e. manipulation of sports competitions;

Provided further that for the purposes of detecting, preventing and investigating the manipulation of sports competitions, the Authority may also share information, including any relevant personal data, with sport governing bodies and other platforms whose function includes the detection of suspicious betting activities and, or are responsible to take action to prevent such manipulation of sports competitions from taking place, and with whom the Authority has signed a data-sharing agreement: Provided further that all processing operations shall be in accordance with the applicable data protection legislation. The Authority is empowered to do so in accordance with article 8(2) of the Gaming Act (Chapter 583 of the Laws of Malta).

i An attachment can only be deleted within 24 hours after uploading.



Once the reply has been successfully submitted, a notification as seen below will be visible.

[Home](#) > [Gaming Services](#) > [Suspicious Betting RFIs & Alerts](#)

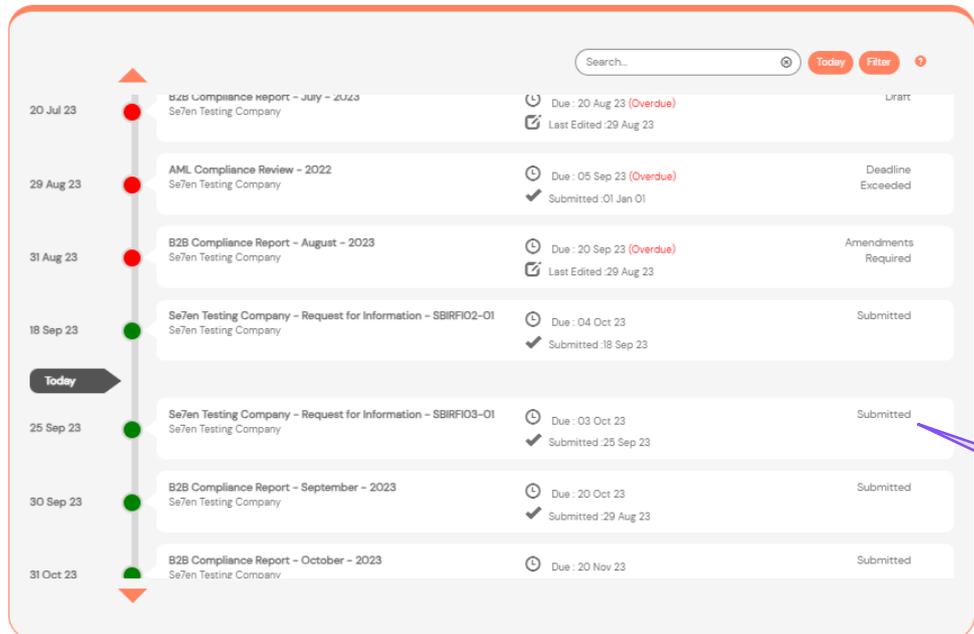
SUSPICIOUS BETTING RFIS & ALERTS

Submission completed successfully.

2.3 Report Status

Once the licensee submits the reply, the status reason will change from 'Draft' to 'Submitted' on the 'Company Timeline' as per **Step 10**. When the status reason is set as 'Submitted', the report will only be visible in a read-only format. If a reply has not been submitted by the licensee in the highlighted timeframe, the report is automatically set to 'Time-Elapsed'. This means that a note has been recorded that a reply has not been submitted on the relevant RFI or Alert.

Company Timeline



Date	Report Title	Company	Due Date	Status	Reason
20 Jul 23	1525 Compliance report - July - 2023	Se7en Testing Company	Due : 20 Aug 23 (Overdue)	Draft	
29 Aug 23	AML Compliance Review - 2022	Se7en Testing Company	Due : 05 Sep 23 (Overdue)	Submitted	Deadline Exceeded
31 Aug 23	B2B Compliance Report - August - 2023	Se7en Testing Company	Due : 20 Sep 23 (Overdue)	Submitted	Amendments Required
18 Sep 23	Se7en Testing Company - Request for Information - SBIRFI02-01	Se7en Testing Company	Due : 04 Oct 23	Submitted	
25 Sep 23	Se7en Testing Company - Request for Information - SBIRFI03-01	Se7en Testing Company	Due : 03 Oct 23	Submitted	
30 Sep 23	B2B Compliance Report - September - 2023	Se7en Testing Company	Due : 20 Oct 23	Submitted	
31 Oct 23	B2B Compliance Report - October - 2023	Se7en Testine Company	Due : 20 Nov 23	Submitted	

Should the SBI department request any further information, the SBI department may set the status to 'Amendments Required' which will re-open the report for further modifications accordingly. An automatic email notification is always sent to the licensee to notify the licensee with the changes made.

3 Conclusion

For any queries relating to this manual or any other sports integrity-related matters, please do not hesitate to contact the MGA's SBI department on sportsintegrity.mga@mga.org.mt.

