

System Audit Checklist



Contents

1	Gaming System	3
1.1	System Architecture.....	3
1.2	Application Architecture	3
1.3	Infrastructure Network.....	3
1.4	Licence Category	3
1.5	Random Number Generator	3
1.6	System Security.....	4
1.7	Player Account Security	4
1.8	Information to be maintained regarding Player Activity	4
1.9	Keeping of Records	5
1.10	Backing Management	5
2	Internal Procedures.....	5
2.1	Know Your Client Information	5
2.2	Gaming Compliance Contribution Calculation.....	6
2.3	Monthly Reporting.....	6
2.4	System to adequately record Financial Transactions	6
2.5	Accounting Software.....	7
2.6	Registration of Players	7
2.7	Players' Passwords.....	8
2.8	Anti-Money Laundering Measures	8
2.9	Players' Accounts and Payment of Winnings.....	8
3	Player Protection.....	9
3.1	Website Contents.....	9
3.2	Display of Player Account Balances	10
3.3	Indication of Currency.....	10
3.4	Information Available to Players.....	10
3.5	Player Self-Protection Mechanisms	11
3.6	Reality Check.....	12
3.7	Full Screen Games.....	12
3.8	Aborted and Miscarried Games	12
3.9	Player Fraudulent Activity Detection	12
4	Digital Assets.....	13

1 Gaming System

1.1 System Architecture

- 1.1.1. The System's architecture is exactly as indicated in the application submission.
- 1.1.2. The System is using 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 is being synchronized with a reputable source.
- 1.1.4. In case of Servers Overseas, the licensee is maintaining a real-time mirror server for essential regulatory data.

1.2 Application Architecture

- 1.2.1. The System's application architecture is exactly as indicated in the application submission.
- 1.2.2. Each application is installed in the location specified in the application submission.
- 1.2.3. The version number of each application corresponds to that notified in the application submission.

1.3 Infrastructure Network

- 1.3.1. The System's infrastructure network matches exactly that indicated in the application submission.
- 1.3.2. The internal IP system matches 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 Licence Category

- 1.4.1. The games correspond with the Vertical and Channel for which a licence was applied.

1.5 Random Number Generator

- 1.5.1. Where applicable, the installation of the brand and model of the RNG is as stated in the application.

1.6 System Security

- 1.6.1. The back-end System automatically logs-off after a minimum of one hour of inactivity.
- 1.6.2. The players' passwords are being stored in one-way cryptographic hash format.
- 1.6.3. Any players' credit card numbers are being stored in encrypted format.
- 1.6.4. The back-end System is only accepting robust passwords which consist of a minimum of eight (8) characters, and are composed of at least alphanumeric characters and/or symbols, or of a mix of lowercase and uppercase characters.
- 1.6.5. Users' passwords must not be identical to the respective usernames.

1.7 Player Account Security

- 1.7.1. Players are automatically logged off after a specified period of inactivity of thirty minutes.
- 1.7.2. The System does not allow players to save logon credentials.
- 1.7.3. The System locks a player's account after a specified number of failed logon attempts.
- 1.7.4. The System provides a lost password procedure for the purpose of recovering a lost password or provides players with a new one over a secure protocol.
- 1.7.5. Players are obliged to change the password provided by the System through the lost password procedure on first logon.

1.8 Information to be maintained regarding Player Activity

- 1.8.1. The System maintains information about the logon and logoff times of players.
- 1.8.2. The System maintains gaming activity history for each player.
- 1.8.3. The System maintains information about the games played by each player.
- 1.8.4. The System records, for each player, the time the game began as recorded on the games server.
- 1.8.5. The System records the balance on the player's account at the start of the game.
- 1.8.6. The System records, for each player, the time the stakes were placed in the game.
- 1.8.7. The System records, for each player, the game status (in progress, complete, etc.).

- 1.8.8. The System records, for each player, the result of the game.
- 1.8.9. The System records, for each player, the time the game ended.
- 1.8.10. The System records the amount won or lost by each player for each game.
- 1.8.11. The System records the balance on the player's account at the end of the game.
- 1.8.12. The System records, for each player, the unique game ID.
- 1.8.13. The System records, for each player, a unique identifier.
- 1.8.14. The System records, the IP address and date of access for each player account.
- 1.8.15. The System is capable of flagging large volume of wagers placed by a player, or large volumes won by a player.

1.9 Keeping of Records

- 1.9.1. The Licensee is, at all times, keeping the following records in a secure manner:
 - A list of all registered players;
 - A list of all game outcomes; and
 - Gaming transaction history (in which each transaction is identifiable via a unique transaction ID).

1.10 Backing Management

- 1.10.1. A backup inventory system is in place, which is in-line with the Backup Policy submitted to the Authority.

2 Internal Procedures

2.1 Know Your Client Information

- 2.1.1. The Players' Database is storing the identity verification status of each player.
- 2.1.2. Verification documentation is stored in a secure manner by the Licensee.

2.2 Gaming Compliance Contribution Calculation

- 2.2.1. The System is capable of producing monthly auditable and aggregate financial statements of gaming transactions.
- 2.2.2. The System calculates accurately the compliance contribution 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 is capable of calculating the total player liabilities at the end of month (Chips in play and jackpots are also be included as player liabilities).
- 2.3.2. The System is capable of identifying jackpot funds.

2.4 System to adequately record Financial Transactions

- 2.4.1. The System adequately records deposits, withdrawals and bonuses.
- 2.4.2. The System adequately records deposits information by players.
- 2.4.3. The System records the date and time of each deposit by each player.
- 2.4.4. The System records the origin of each deposit.
- 2.4.5. The System records the amount of each deposit.
- 2.4.6. The System adequately records withdrawal information by players.
- 2.4.7. The System records the date of each withdrawal by each player.
- 2.4.8. The System records the destination of each withdrawal.
- 2.4.9. The System records the amount of each withdrawal.
- 2.4.10. The System records information about bonuses.
- 2.4.11. The System records the bonus for which a player has qualified.
- 2.4.12. The System records the bonus amount given to a player.
- 2.4.13. The System records the dates when the bonus was played.
- 2.4.14. The System records the bonus amounts played by each player.

2.5 Accounting Software

2.5.1. The accounting software is inputted with the gaming and financial transactions.

2.6 Registration of Players

2.6.1. The registration process is carried out over a secure protocol.

2.6.2. The registration process records detailed player information.

2.6.3. The registration process records the player's date of birth.

2.6.4. The registration process records the player's name and surname.

2.6.5. The registration process records the player's permanent residential address.

2.6.6. The registration process records the player's valid email address or other means of contacting the player by remote means.

2.6.7. The email address or any other means of contacting the player provided as per 2.6.6 checked against existing data for the purpose of not allowing the utilisation of the same means twice.

2.6.8. The email address or any other means of contacting the player provided as per 2.6.6 is verified before applicants are considered registered and allowed to play.

2.6.9. Players below the age of eighteen are not registered.

2.6.10. The registration process filters against a list of self-excluded players.

2.6.11. The registration procedure does not register players in cases where a player's full name, and/or any other required player data field, is identical to that of another registered player within the same player database. (for this purpose, white space should not be taken into consideration).

2.6.12. Players are not registered unless they accept the Terms and Conditions and Privacy Policy.

2.6.13. Registering players have their details entered immediately in the players' database once all data requested has been verified.

2.6.14. Deregistered players are not in a position to logon again.

2.7 Players' Passwords

- 2.7.1. Only robust passwords with a minimum of eight (8) characters, and composed of at least alphanumeric characters and/or symbols, or of a mix of lowercase and uppercase characters are accepted from players.
- 2.7.2. The passwords are not identical to the username.
- 2.7.3. For the purpose of confirmation, during registration, players are asked to input the password twice unless a "show password" button is available next to the password field, in which case players are asked to input password once.

2.8 Anti-Money Laundering Measures

- 2.8.1. Funds are remitted to the same account from which funds originated, provided that, in cases where this is not possible, the alternative destination is secure and that it is verified to belong to the same player.
- 2.8.2. In cases where the total accumulation of deposits or withdrawals equals or exceeds €2,000, the System is in a position to flag the transaction.
- 2.8.3. The System is in a position to flag a single transaction of €2,000 or more.
- 2.8.4. The System identifies suspicious transactions related to money-laundering.

2.9 Players' Accounts and Payment of Winnings

- 2.9.1. An account in relation to each registered player is maintained.
- 2.9.2. Funds from or on behalf of the player are credited to the account referred to in 2.9.1.
- 2.9.3. Funds owed by the Licensee to the player are credited to the account referred to in 2.9.1.
- 2.9.4. The System does not accept wagers from players whose funds at their credit with the Licensee do not cover the amount of the wager.
- 2.9.5. 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 is in place.
- 2.9.6. A procedure that caters for notifying the player, no less than thirty (30) days before the player's account is due to become inactive, that his account is due to become inactive, and reminding the player of consequences thereof, is in place.
- 2.9.7. The System maintains an audit trail of adjustments to player funds.

- 2.9.8. The System is able to identify bonuses and other player incentives from real money which is withdrawable by the player.

3 Player Protection

3.1 Website Contents

- 3.1.1. B2C Licensees offering their services online display the following information prominently on the homepage of their respective gaming websites, and such information must also be accessible from all pages on the website/application interface:

- The B2C licensee details, which identify the licensee and ensure that the licensee can be contacted;
- The registered name of the Licensee's company;
- The address of the company's registered office;
- The official number and date of issue of the Licence;
- A statement that the Licensee's operations are regulated by the Authority;
- A sign which indicates that underage gaming is not permissible; and
- A 'responsible gaming' message which states that gaming can be harmful if it is not controlled and which provides information about player support measures available on the website.

- 3.1.2. B2B Licensees offering their services online display the following information prominently on the homepage of their respective gaming websites, and such information must be accessible from all pages on the website/application interface:

- The B2B licensee details, which identify the licensee and ensure that the licensee can be contacted;
- The activities for which they are licenced;
- The registered name of the Licensee's company;
- The address of the company's registered office;
- The official number and date of issue of the Licence; and
- A statement that the Licensee's operations are regulated by the Authority.

- 3.1.3. The Terms and Conditions are no more than one click away from the homepage of the B2C Licensee, or from the game or activity to which they refer.

- 3.1.4. The homepage contains the procedures adopted by the Licensee for the registration of players.

- 3.1.5. A B2C Licensee makes readily available to players the rules of the games which it is offering, displayed in full no more than one click away from the page in which the game

can be played. In case of games offered via apps, the game rules are made present to the player in any case prior to the player's first wager on the game.

- 3.1.6. A B2C Licensee is ensuring that a page including all the relevant responsible gaming information is permanently visible on the website wherein the service is being offered, and is no more than one click away from any webpage or application interface. The facility for players to exclude themselves from gaming is no more than one click away from this page.
- 3.1.7. The homepage/application interface of a B2C Licensee contains the official Dynamic Seal of Authorisation issued by the Authority.
- 3.1.8. The homepage/application interface of a B2C Licensee which offers games that are regulated by the Authority and games that are not regulated, displays a clear and readily visible and intelligible notice informing players which games are regulated by the Authority and which are not.
- 3.1.9. B2C Licensees who market their services in one or more languages beside the English and/or Maltese language, have all content and information required to be displayed, in that, or those, foreign languages, as well as in the English and/or Maltese language.

3.2 Display of Player Account Balances

- 3.2.1. The balance on the player's account and the relevant currency is visible to the player at all times.
- 3.2.2. Games, 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 are quoted with the symbol of the currency that the player is playing with.

3.4 Information Available to Players

- 3.4.1. The System is capable of providing players with a gaming transaction history.
- 3.4.2. The System is capable of providing players with a financial transaction history including the total deposits, withdrawals, win/loss transactions and total net position.
- 3.4.3. The System provides detailed information about each game.

- 3.4.4. The System displays the name of each game.
- 3.4.5. The System communicates restrictions on play.
- 3.4.6. The System provides instructions on how to play.
- 3.4.7. The System provides a pay table for all prizes and special features.
- 3.4.8. The System displays the player's current account balance.
- 3.4.9. The System communicates the unit and total bets permitted.

3.5 Player Self-Protection Mechanisms

- 3.5.1. The B2C Licensee's System provides an option for players to set a limit on the amount that may be deposited and/or wagered and/or on the losses that may be incurred, within a specified period of time, upon registration, or immediately after registration upon first login, and remain available to the player at any time after registration.
- 3.5.2. The B2C Licensee's System provides an option for players to exclude themselves definitely or indefinitely; and such limits apply for all games offered by the Licensee within the same website.
- 3.5.3. The B2C Licensee's system ensures that such limits apply for all games offered by the Licensee within the same website.
- 3.5.4. Where the B2C Licensee's System provides players who have self-imposed limits or self-exclusions with the possibility to increase or revoke a limit, the increase or revocation may only take place after twenty-four (24) hours from when the B2C licensee has received such a notice.
- 3.5.5. Where the System provides players who have self-excluded for a definite period of time with the possibility of decreasing the period of self-exclusion or revoking it, the decrease or revocation may only take place after twenty-four (24) hours from when the B2C Licensee has received such a notice.
- 3.5.6. Where the System provides players who have self-excluded for an indefinite period of time with the possibility to revoke such self-exclusion, the revocation may only take place after seven (7) days from when the B2C Licensee has received such a notice.
- 3.5.7. The B2C Licensee's System provides players who have self-imposed limits or self-exclusions with the possibility to reduce limits, making them more stringent, and/or to increase the exclusion period. Any such changes must be put into effect immediately after such notice is received by the Licensee.
- 3.5.8. The B2C Licensee's System does not accept a wager from a player in contravention of a limit or exclusion set by players.

- 3.5.9. The B2C Licensee's System excludes from marketing mailing lists any players that have opted to self-exclude, until such self-exclusion applies. The exclusion from the mailing list must take effect not later than twenty-four (24) hours after the player opts to self-exclude.

3.6 Reality Check

- 3.6.1. The B2C Licensee's System offers players the possibility of requesting an alert at certain intervals of time. Such alert:
- Suspends play;
 - Clearly indicates for how long the player has been playing;
 - Clearly displays the player's winnings and losses during such period of time;
 - Requires the player to confirm that the message was read; and
 - Gives the option to a player to either end the session or resume playing.

3.7 Full Screen Games

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

3.8 Aborted and Miscarried Games

- 3.8.1. A Licensee takes all reasonable steps to ensure that its 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. In cases where 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 ensures that the game is terminated.
- 3.8.3. In cases where 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 is refunded to the player.

3.9 Player Fraudulent Activity Detection

- 3.9.1. Collusion monitoring is in place where such an activity is possible.

3.9.2. Chip-dumping monitoring is in place where such an activity is possible.

4 Digital Assets

- 4.2. The System verifies the player's wallet ownership as pertaining to the player before any deposits are made.
- 4.3. The System shall not allow players depositing in Virtual Financial Assets to wager in VFA if the verification process is not completed within 30 days of the first deposit.
- 4.4. The System verifies the identity of player if the total accumulation of deposits equals or exceeds €150 which value can be calculated either on a daily basis taking into account all deposits effected by the player since the establishment of the business relationship; or on the basis of a rolling period of one hundred and eighty (180) days.
- 4.5. In the event that more than a single wallet is being allowed for the same VFA, the system verified the player's identity irrespective of the amount deposited.
- 4.6. In cases where the total accumulation of deposits equals or exceeds €1,000, the System is in a position to flag the transaction.
- 4.7. The System provides all limits specified in section 3.5 of this document for VFA. Such limits are distinct from the limits of fiat currency.
- 4.8. The System considers limits to be in Euro terms even where the deposit is made in VFA whereas the value in Euro terms will be considered at a rate at which time the funds deposited reached the operator.