

The results of the RNG algorithm tests marked with (*) are not covered by ENAC accreditation.

Evaluation Report for: Eyecon Alderney Limited Eyecon Gaming Products (2 Online Games)

Manufacturer:	Eyecon Alderney Limited
ATF Report Number:	IOM.EYECON.1009.01.02
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BMM Spain Testlabs, s.l.u.

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EVALUATION REPORT

Client name & Address:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Client Reference Number:	Client Submission Letter Dated 21 October 2019
Testing dates:	Start date: 25 November 2019 End date: 31 January 2020
Product / Game Description:	Eyecon Gaming Products (2 Online Games)
Test Category:	Category 0
Jurisdictions Recommended:	Isle of Man
Technical Standard used for Evaluation:	See "Scope of Evaluation" section.
Location where test was performed:	BMM Spain testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés Barcelona – España
Location where report was issued:	BMM Spain testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés Barcelona – España
Conclusion:	Pass
BMM Reference Number:	EYECON.1009
Method/Procedures used:	EURAF-SPA-MO-04 V4.4
Consultant(s):	Gerard Moreno, Enric Ferrés

1. SCOPE OF EVALUATION.

Eyecon Alderney Limited requested BMM Spain Testlabs s.l.u to evaluate Eyecon Gaming Products (2 Online Games), the online platform/online game for operation in the relevant below Isle of Man market:

- Online Gambling Regulation Act. 2001
- Online Gambling Regulation Amendment: Network Services Regulation 2011
- The Online Gambling, Disaster Recovery Nº 2, 2007
- The Online Gambling, Advertising Regulations 2007
- The Online Gambling, Betting and Miscellaneous Provisions Regulations 2007
- The Online Gambling, Exclusions Regulations 2010
- Online Gambling, Licence Fees Regulations 2009
- Online Gambling, Participants money Regulation, 2010
- The Online Gambling, Prescribed Descriptions, Regulation 2007
- The Online Gambling, Registration and Accounts, Regulation 2008
- The Online Gambling, System Verification Nº 2, Regulation 2007
- Online Gambling Duty Regulations 2008
- Online Gambling Registration and Accounts Amendment regulations 2014
- Online Gambling Registration and Accounts Amendments regulations 2016

2. EVALUATION CHARACTERISTICS.

2.1. GAME DESCRIPTION.

Game rules are contained in the help files accessible on the individual game play skin. There are three types of games evaluated by BMM; multi-HTML5, 'DH' and 'MH'. 'DH' type games are standard desktop games. 'MH' games are designed to run on Mobile phone and tablets; however, these games can still run on typical browsers. Games not denoted are multi-HTML5 where the game is can be launched the same on either device type.

2.1.1. Heartburst (DH, MH) & Heartburst JP (DH, MH) v 3.1.8

Heartburst is a 5-reel, 100-payline slot with expanding substitute and free games feature. Game can be configured to operate with or without additional Jackpot.

2.1.2. White Wizard Deluxe (DH, MH) v 3.1.6

White Wizard Deluxe is a 5-reel, 100-payline slot with expanding substitute and free games feature.

2.2. GAME PERCENTAGE VARIATION DETAILS.

Game Name	Game Variation	BMM Results		CLIENT RESULTS		Certification / Approval ID
		% RTP Minimum	%RTP Maximum	% RTP Minimum	%RTP Maximum	
Heartburst DH	95%	95.63%	95.63%	95.631%	95.631%	*
Heartburst MH	95%	95.63%	95.63%	95.631%	95.631%	
Heartburst DH JP	92%	92.07%	92.07%	92.067%	92.067%	
Heartburst MH JP	92%	92.07%	92.07%	92.067%	92.067%	
White Wizard Deluxe DH	95%	95.63%	95.63%	95.631%	95.631%	
White Wizard Deluxe MH	95%	95.63%	95.63%	95.631%	95.631%	

Note: (*) denotes items under test

2.3. EVALUATED OBJECT IDENTIFICATION.

Game Name	Description	File Name	SHA-1 Signature
Heartburst DH	Client	slot-heartburst-2.0.10.zip	91884CF429BD36CB5E863A074D958E59C6F3984D
	Rules	carbine-slots_heartburst_95_standard-3.1.6-config.jar	B8AB5CEDD051EE41903AE005044A397C205AFF37
Heartburst DH JP	Client	slot-heartburst-2.0.10.zip	91884CF429BD36CB5E863A074D958E59C6F3984D
	Rules	carbine-slots_heartburst_92_jackpot-3.1.6-config.jar	8EB43382AB07F4EE27B324438188F147D8BCC058
Heartburst MH	Client	slot-heartburst-5.0.17.zip	A645C7921EC2D7C366DA68330AC8D12C1178CFB9
	Rules	carbine-slots_heartburst_95_standard-3.1.6-config.jar	B8AB5CEDD051EE41903AE005044A397C205AFF37
Heartburst MH JP	Client	slot-heartburst-5.0.17.zip	A645C7921EC2D7C366DA68330AC8D12C1178CFB9
	Rules	carbine-slots_heartburst_92_jackpot-3.1.6-config.jar	8EB43382AB07F4EE27B324438188F147D8BCC058
White Wizard Deluxe DH	Client	slot-white-wizard-deluxe-2.0.8.zip	2DF9C43AF90BB8F5BFB0284F26909F5198CF0B46
	Rules	carbine-slots_whiteWizardDeluxe_95_standard-3.1.4-config.jar	2D07411C678D6822FF4B25194B4B04E2EB31A3B0
White Wizard Deluxe MH	Client	slot-white-wizard-deluxe-5.0.6.zip	CE2691815D47432E42CC7FB73713895CC791F5C5
	Rules	carbine-slots_whiteWizardDeluxe_95_standard-3.1.4-config.jar	2D07411C678D6822FF4B25194B4B04E2EB31A3B0

3. BMM EVALUATION PERFORMED.

BMM Spain Testlabs s.l.u. has tested the new Eyecon Alderney Limited software Eyecon Gaming Products (2 Online Games against the relevant requirements of the Isle of Man market:

3.1. Software Evaluation

Ensure that software meets all the relevant requirements specified in Isle of Man market. BMM performed this by evaluating all the game source code.

3.2. Artwork Verification

Artwork was evaluated to ensure that it correctly explains the game rules and payouts as specified in the technical documentation supplied by the manufacturer and that it conforms to the requirements of Isle of Man market.

3.3. Mathematical Evaluation

Verification of the different probabilities per each type of bets of the game.

3.4. Combination Testing

Combination testing was conducted by simulating all possible winning combinations from each game to ensure that the correct amount of credits is awarded for all possible winning combinations reflected on artwork.

4. BMM EVALUATION PERFORMED.

BMM Spain Testlabs s.l.u. has tested the new Eyecon Alderney Limited software Eyecon Gaming Products (2 Online Games) against the relevant requirements of the Isle of Man online market:

The Online Gambling, System Verification Nº 2, Regulation 2007	Results		
	OK	Fail	Observations
Schedule 1: Requirements with which systems must comply for gaming and lotteries			
General			
The system must:	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(a) follow the rules for Online Gambling published to the Participant or potential Participant prior to its placing any sums with the Operator for participation in Online Gambling; and,	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) provide over specified periods no more than the house advantage (if any) agreed by the Commissioners with the Operator; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) integrate contingencies for loss of continuity of play; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(d) if utilised in any peer to peer game, ensure that over the specified periods that no one Player has any advantage over any other Player playing the same game.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Both the Online Gambling and financial transactions software must be congruent and secure.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Randomness			
The System must satisfy the following criteria for randomness for any Gaming or Lottery (save where different rules apply and have been approved by the Commissioners and published to the Participant or potential Participant prior to its participation), following Schneier:			
(a) the data must be randomly generated, passing appropriate statistical non static output results tests of randomness (e.g., Marsaglia's "Diehard" set of tests) uniformly distributed over the set range;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. RNG was previously evaluated. (*)

The Online Gambling, System Verification № 2, Regulation 2007	Results		
	OK	Fail	Observations
(b) the data must be unpredictable, i.e. it must not be computationally feasible to predict what the next number will be, given complete knowledge of the algorithm or hardware generating the sequence, and all previously generated numbers;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. RNG was previously evaluated. (*)
(c) the series cannot reliably be reproduced, i.e. if the sequence generator is activated again with the same input (as exactly as humanly possible) it will produce two completely unrelated random sequences.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. RNG was previously evaluated. (*)
The Operator must disclose the methodology of any random seeding and any seeding must be proven to result in an unpredictable output.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. RNG was previously evaluated. (*)
The outcome of any Game or Lottery, as the case may be, and the return to the Participant, must be independent of the CPU, memory, disk or other components used in the computer or other device used by the Participant.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
The Game or Lottery outcome, as the case may be, must not be affected by the effective bandwidth, link utilization, bit error rate or other characteristic of the communications channel between the system and the computer or other device used by the Participant.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
The System must be able to display for each Game or Lottery, as the case may be, the following information on the current page or on a page directly accessible from the current page via a hyperlink:			
(a) the name and rules of the Game and/or Lottery;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(b) restrictions on play;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(c) instructions on how to play, including a pay-table for all prizes and special features;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

The Online Gambling, System Verification № 2, Regulation 2007	Results		
	OK	Fail	Observations
(d) the Participant's current account balance and currency or currencies utilised by the Participant to participate in the Game and/or Lottery;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(e) unit and total sums permitted to be played by a Participant in relation to the Online Gambling;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(f) the return to the Participant, disregarding any exercise of skill by him; and,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(g) pursuant to the testing of the System, the percentage of total sums returned to Participant in relation to all house Games or Lottery, as the case may be, offered by the Operator.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Reporting Requirements			
All financial reports produced by the system must be readily reconcilable with Gaming or Lottery transaction reports (as relevant) and conversely. All such reports shall be freely available to the Commissioners	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The System must: (a) be capable of producing auditable and aggregated financial statements of Gaming and/or Lottery transactions (as relevant); and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) calculate accurately all excise of duty payable under the Act and other monies due to the Treasury under the Act.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The System must maintain information about all Games and/or Lotteries played, Including:			
(a) the identity of the Participant;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) the time the Game began;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) the balance on the Participant's account at the start of the Game or the start of the Participant's participation in the Lottery (as relevant);	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, System Verification N° 2, Regulation 2007	Results		
	OK	Fail	Observations
(d) the sums placed by Participant placed in the Game (timestamped);	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(e) the Game status (in progress, complete, etc.);	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(f) the result of the Game and/or Lottery (timestamped);	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(g) the time the Game ended;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(h) amount won or lost by the Participant;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(i) the balance on the Participant's account at the end of the Game and/or Lottery (as relevant); and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(j) the currency or currencies utilised by the Participant.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The System must maintain information about significant events as follows:			
(a) large wins (as agreed by the Commissioners from time to time);	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) transfers of funds (between Participants or between any Participant and the Operator) in excess of such amount as the Commissioners may from time to time direct by notice in writing to the Operator;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) material changes made by the Operator to Game and/or Lottery returns, disclosed under paragraph 7 above; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, System Verification Nº 2, Regulation 2007	Results		
	OK	Fail	Observations
(d) material fluctuations in theoretical/estimated statistical return to Participants (agreed with the Commissioners from time to time).	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Schedule 2: Betting			
Any software utilized must be capable of providing for congruent and secure betting and financial transactions.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The System must be able to display the following information on the current page or on a page directly accessible from the current page via a hyperlink:			
(a) the rules regarding the placing of Bets, including circumstances in which the Operator will void a Bet; the treatment of errors, the treatment of late Bets and the treatment of withdrawals and non-runners;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) restrictions on the placing of any Bets;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) the Participant's current account balance and the currency or currencies utilised to place Bets; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(d) the means by which a winning Bet will be determined.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
All financial reports produced by the System must be readily reconcilable with Betting transactions reports, and conversely. All such reports shall be freely available to the Commissioners.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The System must be capable of providing auditable and aggregated financial statements:			
(a) of Betting transactions; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) sufficient to calculate accurately any and all duty of excise payable under the Act and other monies due to Treasury under the Act.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, System Verification N° 2, Regulation 2007	Results		
	OK	Fail	Observations
The System must maintain information about all Bets received from Participants, including:			
(a) the identity of the Participant;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) the time that the Bet was taken;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) the balance in the Participant's account at the start of any Betting transaction;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(d) the Bets made by any Participant;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(e) amounts won or lost by the Participant;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(f) the currency or currencies used by the Participant;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(g) large wins (as agreed by the Commissioners from time to time); and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(h) transfers of funds (between Participants or between any Participant and the Operator) in excess of such amount as the Commissioners may from time to time direct in writing to the Operator.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The Operator shall provide Participants with full and sufficient information regarding payment of winning Bets and describe the manner of distributing and paying the winnings including arrangements where there are no winning Bets and the manner of claiming payment of winnings. The Operator shall clearly provide on its website full and sufficient details that are true, clear, intelligible and sufficient to allow any Participant to verify any payment of winnings due to it. Such information shall contain information regarding any charges made to a Participant either by the Operator or a third party on its behalf in relation to the Betting and how the Operator calculates winnings due to a winning Participant	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, System Verification N° 2, Regulation 2007	Results		
	OK	Fail	Observations
The Operator shall ensure that the integrity of the Betting transactions can be assured and that Participant transactions are not lost though System failures or unauthorized modification or access by a third party.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Where the currency taken for a Bet is converted into tokens, chips or credits, the conversion thereof shall be clearly stated to the Participant on the Operator's website	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The Operator shall, in addition to the foregoing, clearly provide on its website such information regarding the Betting that the Commissioners shall reasonably require in relation to the Operator's Betting Operation.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Advertising Regulations 2007	Results		
	OK	Fail	Observations
2. Requirement for Website			
Every Operator shall, in relation to any Online Gambling, maintain a Website the home page of which contains the following			
(a) its full name and the address of its registered office;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) the number of the licence under which the Online Gambling is conducted;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) the date on which the licence under the Act was originally granted;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(d) a statement that the Online Gambling is regulated in the Isle of Man;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(e) the coat of arms of the Isle of Man in a form approved by the Commissioners;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Advertising Regulations 2007	Results		
	OK	Fail	Observations
(f) hyperlinks to the Websites of the Isle of Man Government and Gamblers Anonymous or such other association or body that assists problem gamblers as may be required by the Commissioners;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(g) one or more hyperlinks to a page or pages setting out	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(i) a summary of the arrangements for registration;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(ii) a statement that persons under the age of 18 are not permitted to register or to participate in Online Gambling; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(iii) a statement that Online Gambling debts are enforceable in law in the Island.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
A statement under paragraph (1)(d) may in addition state that the Online Gambling is regulated in the British Isles, but shall not state or imply that it is regulated in the United Kingdom.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
3. General Requirements of Advertising			
Every Advertisement of Online Gambling shall contain the URL of (or, in the case of an Advertisement on a Website, a hyperlink to) the Website maintained under regulation 2.			
Every Advertisement of Online Gambling shall comply with the following general requirements	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(a) it shall not be indecent or offensive;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) it shall be based on fact; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) it shall not be false, deceptive or misleading in any material particular.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Advertising Regulations 2007	Results		
	OK	Fail	Observations
Without prejudice to paragraph (2), every Advertisement of Online Gambling shall comply with the following requirements	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(a) it shall not contain any statement as to the legality or otherwise of Online Gambling or any kind of online gaming, online betting or the like in any other jurisdiction;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(b) it shall not be directed at any jurisdictions in which Online Gambling or any kind of online gaming, online betting or the like is prohibited;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(c) it shall not have any sexual content;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(d) it shall not be directed at persons under 18;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(e) it shall not contain any material in breach of copyright;	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
(f) if it makes any claim as to the potential payout or win in relation to any Online Gambling, it shall contain sufficient information to enable a person to determine readily and easily the expected percentage return to him over a period of time, disregarding any exercise of skill by him.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Betting and Miscellaneous Provisions Regulations 2007	Results		
	OK	Fail	Observations
3. Accounts and information			

The Online Gambling, Betting and Miscellaneous Provisions Regulations 2007	Results		
	OK	Fail	Observations
Every Operator that is Betting Operation or that conducts part of its business as Betting Operation shall, in relation to its Betting Operation:			
a) Keep such and records as may be required by the Commissioners and make such promptly available to the Commissioners on request, and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) prepare statements of accounts in such form and in respect of such period or periods as may be required by the Commissioners to determine any and all duty of excise payable under section 5(3) of the Act; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
c) provide such information regarding its Betting Operation as shall be required by the Commissioners, promptly and fully to the Commissioners.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

Online Gambling, Participants money Regulation, 2010	Results		
	OK	Fail	Observations
4. Duty to hold participants' money separately			
An operator must pay all participants' money received by it into a client account.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Participants' money must be held on trust for the participant entitled to it	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Paragraph (1) does not apply to participants money to the extent to which any liability of the operator to pay that money to participants is covered by security provided or deposits and reserves maintained in accordance with conditions of the operator's licence imposed under section 6(2) of the Online Gambling Regulation Act 2001.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
1) In these regulations "participants' money means subject to par. 2 and 3, money which an operator: a) holds or receives from a participant, or b) owes a participant; for the purposes of, or in the course of, online gambling.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

Online Gambling, Participants money Regulation, 2010	Results		
	OK	Fail	Observations
2) Participants' money includes, subject to par 3, deposits, winnings, sums transferred to the participant's account with the operator, gratuities and bonuses redeemed by the participant.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
3) Despite par. 1 and 2 money received by the operator from the participant is not participants' money if: a) The money has been placed by the operator with a third-party of a kind approved for that purpose by the Commission, in order to permit the participant to gamble with that third-party b) The money is still with the third-party or has been lost in gambling with the third-party; c) The placing of the money mentioned in a subpar. (a) took place with the knowledge and consent of the participant; and d) The operator can demonstrate that, at the time of the placing of the money as mentioned in the subpar. (a), the operator informed the participant that the money would be thereafter unprotected	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Participants money held in a client account that conforms to these regulations is deemed to satisfy the licence conditions imposed by section 6(2) of the Online Gambling Regulation Act 2001 in respect of the provision of security, deposits and reserves.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Paragraphs (1) and (2) do not apply where the operator pays participants money to, or by the written direction of, the participant entitled to it.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
5. Additional amounts to be held in client account			
This regulation applies where a participant makes an electronic payment to or receives payment from an operator through a payment service provider	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
If there is a shortfall between the total amount of money available from an operator's approved player protection mechanisms and the total value of participant's money as recorded on the operators system then the operator must hold additional funds in the client account equal to the difference.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
If shall be acceptable for the purposes of reducing the volume of money transactions to and from a client account for an operator	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game

Online Gambling, Participants money Regulation, 2010	Results		
	OK	Fail	Observations
to maintain a surplus of money, or allow to accrue bank interest in a client account equal in value or percentage to that agreed with the Commission.			evaluation.
Money held in a client account in respect of paragraphs (2) and (3) shall be considered participants money and its use for purposes other than safeguarding participants money must be approved by the Commission	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Surplus money in a client account held as described in paragraphs (2) and (3) may be drawn from the client account by the operator provided this action does not being the total value of the funds in the operators approved player protection mechanisms below the total value of participants money as recorded on the operator's system.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
8. No withdrawal in case of default			
Where an operator is in default, no money may be withdrawn from any client account of the operator without the consent of the Commission.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Registration and Accounts, Regulation 2008	Results		
	OK	Fail	Observations
3. Rules for registration			
No participant may be registered except on an application for registration in such form, and containing such particulars, as may be approved by the Commissioners.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
No players under the age of 18 may be registered	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Before a prospective player may be registered, he or she must must provide details of:			
a) age	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Registration and Accounts, Regulation 2008	Results		
	OK	Fail	Observations
b) identity and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
c) place of residence	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The operator shall use his best endeavors to exclude from registration, and to cancel the registration of a) who identifies himself or herself as a problem gambler b) who is so identified, with his or her consent, by a registered medical practitioner (within the meaning of section 3 of the Health Care Professionals Act 2014) who is responsible for the care of the person; or c) whom the operator believes to be a problem gambler	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The operator shall maintain a secure database of all present and past participants	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
5. Rules as to play			
A) 1) An operator must not accept any stake or bet in money or money's worth from a participant which, were the stake or bet to be lost in the course of online gambling (whether alone or in combination with any other stake or bet), would result in the participant's account becoming overdrawn. 2) Par. 1 doesn't apply if the Commission have given their prior written consent to its disapplication.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
B) Before a Player is permitted to begin a session of Online Gambling, the Operator shall request and the Player shall provide unique identifying information (such as a user name and password) previously notified to or supplied by the Operator)	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
C) 1) Operators must make available to players at least one of the following: a) the ability to set deposit limits b) spending limits c) loss limits.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
2) The operator must comply with any request to apply a limit under paragraph 1) as soon as reasonably practicable	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
3) If the operator cannot, for any reason, comply with a request to apply a limit under par. 1) when the request is received, the operator must notify the player that this is so, and at the same time inform the player when the limit will take effect	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Registration and Accounts, Regulation 2008	Results		
	OK	Fail	Observations
<p>4) For the purposes of this regulation:</p> <p>a) a deposit limit is a limit restricting the amount a player can deposit with an operator during a period specified by the player</p> <p>b) a spending limit is a limit restricting the amount a player can spend on online gambling within a period specified by the player</p> <p>c) a loss limit is a limit restricting the amount a player can spend on online gambling within a period specified by the player</p> <p>d) the net amount which a player can lose is the total amount staked by the player during that period less any winnings arising during the period</p>	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
6. Privacy			
An Operator shall not disclose to any person:	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
a) any information obtained by him on the registration of or opening an account with a Participant	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) any information as to the state of a Participant's account	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Paragraph (1) does not apply where the disclosure is:			
a) required by law, or	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) made with the consent of the relevant Participant	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Paragraph (1) is without prejudice to any requirements of the Data Protection Act, as the same may be amended or re-enacted from time to time	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Schedule: Rules as to Accounts			
Opening of account			
An account may not be opened except by means of a deposit of money:			

The Online Gambling, Registration and Accounts, Regulation 2008	Results		
	OK	Fail	Observations
a) by credit or debit card,	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) by such other means as may be approved by the Commissioners	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
The operator shall not encourage a player to hold more than one account	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Until the requirements of rule 5 are complied with, participant may not deposit sums exceeding in the aggregate such amount as the Commissioners may from time to time direct by notice in writing to the Operator	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Use of account			
Money deposited by a credit or debit card must not be available for Online Gambling until.			
a) the funds are received from the provider of the card account, or	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) the provider issues an authorisation number to the Operator indicating that the funds are guaranteed (in which case the number shall be maintained in a system audit log)	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Withdrawal from account			
The operator shall provide a Participant with a means of verifying his identity before any balance on his account may be withdrawn, consisting of:			
a) a personal identification number (PIN) sent to his place of residence as stated in his registration, or	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) such other means as may be approved by the commissioners	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
A participant shall not be permitted to make withdrawals from his account unless his identity has been positively in accordance with rule 5.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Registration and Accounts, Regulation 2008	Results		
	OK	Fail	Observations
1. a Player shall not be permitted to make withdrawals from his account except:			
a) to the card account or other financial facility from which the initial deposit was made, or	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) to a card account or other financial facility from which a deposit has been previously made by the Player and which the Operator is satisfied still belongs exclusively to the Player or	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
c) to a card account or other financial facility that the Operator is satisfied will result in the Player exclusively receiving the withdrawal	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
2. Where a withdrawal from a Player's account is made by cheque exceeding, or cheques exceeding in the aggregate, such as the Commissioners may from time to time direct by notice in writing to the Operator, the Operator shall carry out such additional verification procedures as the Commissioners may so direct.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
3. A Business Participant shall not be permitted to make withdrawals from its account except in the form as the Commissioners may direct in writing to the Operator.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
A participant must be able to access online a statement of its account containing:			
a) sufficient information to allow it to reconcile the statement against its own records to the session level; and	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) details of major wins	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
Security of Account			
1- Participants accounts must be secured against invalid access or update by methods approved in writing by the Commissioners.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
2- All deposits, withdrawals and other transactions must be maintained in a system audit log	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

The Online Gambling, Registration and Accounts, Regulation 2008	Results		
	OK	Fail	Observations
3- A secure online list of all accounts (current or closed) must be maintained.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
4- An inactive account in credit must be protected against forms of illicit access or removal.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
5- All account transactions must be backed up so as to be capable of being recovered in case of system failure	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
6- Personal data of a confidential nature, including the following:			
a) details of Participants bank and other accounts	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) card numbers	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
c) card expiry dates	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
d) expected answers to any questions used to verifying a Participants identity (e.g. mother's maiden name)	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
7- Personal information numbers (PINs) relating to:			
a) bank and other accounts	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.
b) Participants accounts must be stored using an irreversible encryption algorithm.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. This is a game evaluation.

LIVE DEALER INSPECTIONS

The following licence conditions pertain to live dealing. These may be amended or added to, depending on the specific requirements of a licensee: 1) The licensee will ensure that at least one on-site compliance	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
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visit to each live dealer studio is undertaken annually, in line with the current Live Dealer Inspection Procedures. This compliance visit must be undertaken by an Isle of Man approved test house.			
2) A satisfactory test report must be provided to the Commission annually, on or before the anniversary of the last certificate provided, or at a date agreed with the Commission	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
5) The agent providing the live dealing facilities must at all times enforce Isle of Man standards of AML/CFT and data protection in relation to Isle of Man facing business	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Responsibility Tests – these tests are designed to ensure that staff understand how to recognise problem gamblers and know the procedures which must be undertaken when appropriate. They must also understand AML/CFT procedures in force and understand when to escalate these to management.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Technical Tests – these relate to the hardware (roulette wheels, card shoes, tables, etc) and consumables (cards, dice, etc) used by the live dealing facility. They must include checks on the randomness of any equipment or procedures (including commentary on the uniformity and independence of game elements) to ensure their fairness and integrity.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Payout ratios must be checked and equipment inspected to ensure that it is free from defects or mechanisms that could interfere with fairplay.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Card shoes and similar devices must be equipped with adequate tamper controls once they have been loaded. Such controls must preclude interference prior to play and any cards must have an associated audit trail which shows which staff had access to the cards at any given time for any given operation.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
The procedures must also demonstrate that one person would not be able to undertake all duties concerning card management and that there is segregation of responsibilities prior to play, during play and after play.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Any equipment that is used to scan or otherwise detect the cards must be tested for reliability and all consumables that will be subjected to this hardware must be checked against it for defects	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.

prior to processing, in order to prevent play being disrupted.			
Devices should be equipped with a manual over-ride that is clear to players when used and which allows a defective result (where the detection equipment misreads a card, the position of the ball, etc) to be over-ruled.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Security recordings – CCTV footage and all game logs must be captured in such a way that precludes interference or deletion. These should be stored off-site and subject to periodic analysis – they should be retained by an independent agent. Game logs should be sent off-site for storage, analysis and review.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
The gaming area should be defined and made secure. The pit boss or equivalent must always be present in this area when gaming is taking place.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Where the public have access to the facilities as well as online players, measures must exist to ensure that CCTV and video feeds that relay the game cannot be obscured – even temporarily – by the dealer or players. In addition, procedures must exist to handle situations where the dealer or pit boss suspects that a live player has interfered with the facilities.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Live players in the casino environment must be made aware that they are being filmed as part of a live feed.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Synchronicity Tests – these check that equipment or procedures designed to assure players that the game is live, cannot be interfered with or manipulated in such a way as to relay false information.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Staffing Tests – these should include checks on the recruitment, vetting, training, tracking and departure of staff. Dealers and other staff involved in the live dealer operation should not know which game they will be attending until immediately prior to their shift commencing. Their allocation should incorporate a random element of some kind and procedures concerning rotas and shift patterns must be documented. Staff should not spend excessive time on a given game in order to minimise mistakes and prevent collusion. The retention of documentation must be robust, allowing staff records to be audited and investigations to be performed where staff members are either involved directly or where their presence in a particular place and/or time, is crucial to	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.

understanding a chain of events.			
Premises Tests – these are designed to ensure the suitability of the physical premises and include checks that they are secure, can only be accessed by authorised staff and that the facilities are legal in the jurisdictions in which they operate (for example, they comply with local fire and employment law, and so forth). The actual gaming area must be defined and a supervisory member of staff always present when gaming is taking place.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Anti-collusion tests – these are designed to minimise the chances of player/player and player/dealer collusion. The checks should ensure that player table activity (including choice of table, opposing players, play history, dealer choice) is tracked and available to the operator when required.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
The checks should also identify how dealers are allocated to tables (ideally without prior knowledge of which table they will be serving and with their time-on-table set at a level to deter harmful relationships being developed).	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
In addition, the facility or the operator should have a system which detects players who reject tables and re-apply for another on a consistent basis until they arrive at their preferred table (while this isn't necessarily evidence of collusion, it should be flagged as a risk factor).	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Systems Tests – these tests are designed to ensure the robustness of the live dealing facility's management and processes. The tests should scrutinise any periodic reviews that are conducted by the facility to ensure that risks are identified, mitigated and underwritten by contingency plans; such reviews would be expected on IT systems, physical security, etc. Systems should be in place to detect possible instances of cheating by players (by observing their behaviour for example).	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Cards that are beyond use must be marked to preclude their accidental re-use in games and should be destroyed. Cards and other gaming consumables must utilise a mechanism (barcode, bin cards, etc) which allows their status to be readily identified and their stock history to be traced to staff members and locations. Ideally, different stages of the process for the preparation of gaming consumables should be performed by different people.	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.

Clear procedures must be present and understood by staff to include:- incorrect card detection; dropped cards; misdeals; respins; aborted games; and table closure. These events must also be collated into statistics which can be analysed for trends relating to games, staff and/or locations in the gaming area (e.g. blackjack table number 2).	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.
Separate procedures must exist for each game and new games must have their procedures in place before being offered to players. Staff must understand any physical behaviour that is prohibited or mandated (including hand signals, talking, the handling of the cards, etc).	<input type="checkbox"/>	<input type="checkbox"/>	Out of Scope. There is no live dealer.

5. ADDITIONAL INFORMATION/OBSERVATIONS

MODIFICATION 01:

This report IOM.EYECON.1009.01.02 is a modification and replaces the BMM test report previously issued with reference IOM.EYECON.1009.01 dated 31st January 2020. The reasons for the modification are as follows:

- Changed the client results' RTP on page 4 due to a request for the client to put three decimals on their RTP instead of rounding to the second decimal.

6. CONCLUSION

According to the test results¹, BMM Spain Testlabs s.l.u. confirms that the item submitted for testing is compliant with all the relevant Regulations listed in section "1" of this report.

Yours sincerely,


BMM SPAIN TESTLABS S.L.U.

Francesco Bianchi
Director of iGaming Operations EURSAM


BMM SPAIN TESTLABS S.L.U.

Mario Zilevski
Director of Technical Services - Europe

¹The results included in this document refer exclusively to the sample tested, such as it is described in the corresponding section.