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Report:

Inspection	I111
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Report Type: Inspection

Report Date: 13 August 2024

Inspection Body: GLI Europe BV

Evaluating Laboratory: GLI Europe B.V.
Diakenhuisweg 29-35
2033AP, Haarlem,
The Netherlands
RvA I111

Report Recipient: Eyecon Alderney Limited
Inchalla, Le Val
Alderney GY9 3UL

Jurisdiction: Netherlands Remote

Technical Standard(s) for Inspection: Remote Gambling Assessment Scheme (Remote gambling conformity assessment scheme) Version 2.0

Supplementary Documentation: RGD: Decree of 26 January 2021 laying down provisions for the implementation of the Remote Gambling Act (Remote Gambling Decree).
RGR: Regulation of the Minister for Legal Protection of 21 January 2021, no.3181155, laying down provisions for the implementation of the Remote Gambling Act (Remote Gambling Regulation).

Software Supplier: Eyecon Alderney Limited
Inchalla, Le Val
Alderney GY9 3UL

Submitting Party/ Licensee Name: Eyecon Alderney Limited
Inchalla, Le Val
Alderney GY9 3UL

Product Inspected: **Fondant Favourites StarTrail**, as described in the Software Product Details section.

Request Date: As requested per submitter's request received on 5 August 2024.

Evaluation Period: 05 August 2024 / 08 August 2024

Internal Reference: EE-609-EYL-24-04

Inspection Result: Subject to the Conditions of Evaluation section of this Report and to the applicable Inspected Items listed in the Jurisdictional requirements section of this Report:
Complies



Software Product Details

GLI inspected the following game:

Game Type	Game Name	Version
Slot Game	Fondant Favourites StarTrail	5.16.1

The game is inspected in an environment containing the following components:

Client-Side Details	
Delivery Mechanism:	Web-Based / Mobile
Delivery Mechanism Type:	HTML5
Evaluation Details	
Platform(s) and Version(s) Evaluated With:	3.16.0
Browsers and Versions Evaluated With:	Testing on the game is performed by iTech Labs. See ITL2402076
Flash Versions Evaluated With:	Testing on the game is performed by iTech Labs. See ITL2402076
Operating System(s) with Version:	Testing on the game is performed by iTech Labs. See ITL2402076
Mobile Device(s):	Testing on the game is performed by iTech Labs. See ITL2402076
Tablet Device(s):	Testing on the game is performed by iTech Labs. See ITL2402076



Software Product Details

For version-control of the files, GLI gathered the following checksums:

File Name	SHA-1 Checksum
Fondant Favourites StarTrail (93 WEB)	
carbine-game-engine-5.16.1.jar	C22EC0A25565D517D2F9D9094E78988885073DD5
carbine-slots_fondantFavouritesStarTrail_93_standard-1.0.7-config.jar	3DBC1251C8388700B6226CDB26422CDF61CB6B05
carbine-slots_fondantFavouritesStarTrail_93_standard-1.0.7.json	26D7C3292573242FF7868114B37C12EC85F421FE
CarbineGame.class	DA33D123332DE7A3DA26909F5C8D04CBEEB6086E
CarbineGameComponent.class	CDEAF4F09BB87FBCD8E9B3411EDCE29714D04540
CountSymbolEvaluator.class	576C91BE9189657F4DCD79A6DD24D666D7E8A4A5
EvaluationChain.class	BC534352CC4BDB9C12FFBE493B67ABF308CEED18
EyeconSpinGameRules.class	E45FA9F06D7598168B34EFAE0A6C188BDBBCA3D
GameWinsCalculatorImpl.class	5DBC93C0E3838A7C4DC2AD281D3AD1D68B8BFD8FF
HoldAndRespinGame.class	CF01FEE61D0EC7B92D507FED74D58EF901C09FBA
HoldAndRespinRulesImpl.class	C22881DAC73184331D3EE474BF06B63EA7F63BC6
HoldAndRespinState.class	691F166560C862DF5291E4D0EE84DE8A32CD8222
LinesWinMultiPatternEvaluator.class	725AA252D88A32712345310D8CB5C83A490A2548
Multiplier.class	ACC995BF8FCF1278C0770C47CDD17C56AC389ED8
PatternMatchingEvaluator.class	7D99BC50BF94187B55CEAFC36839AA3DB80B05C5
PrizeLinePatternMatchingEvaluator.class	D9EAE0138B5B40DC780E6DD63EF8FDA37B75FE3
PrizeLineTriggerEvaluator.class	459FCE9E3BE01F4F5A53BBB8813BD706274F2390
PrizeMultiplier.class	37C3EB7470125014D97A8BE6A9D942E46846516D
rebet\DisplayGenerator.class	5969CDEC1412E88BE902F3E9B521502E17C092BA
RebetDetailBuilder.class	98DAB1C87BEDCAADB9FBD78E616F00B304D276F
RebetEvaluator.class	A2FECF4BD265E72EF1680251FF7E02608CBA16C1
RebetsLineWinPatternMatchingEvaluator.class	437967E660C176F9ABAC02E1D3DF5C51210FACF8
reelstrip\DisplayGenerator.class	C083C09E87FA603CAD08FECF3F0BD174FBA74B89
ReelStripGenerator.class	2E1F466A65DA9CBA3D2D4D85639CFF560214AE70
ReelSymbolExpander.class	64C3A772AF93FA2AE20994F2D4A338DCFA3356A2
ResetRebetEvaluator.class	C15AF27D44FF3C62834438AB1F6615EAA36593D6
RetriggerCount.class	52F246C12BA73D4BB0998167556C2A6C46D40BCE
RngSequences.class	EAD214C3DD4974C3C5B9B6A975ECA7323D9524E4
SlotGameVariableConfigurationImpl.class	73B7BAF38E3904CF4464B3ADF43B85486F439369
SymbolHoldSpinGame.class	48CB554DD73CA2A3D3F025F5220F8B36CAEC9335
SymbolHoldSpinRuleImpl.class	6305BB4B5905FD0335C32A0717E865CD54325EA7
SymbolHoldSpinScreenEvaluator.class	8A65FB7B419FEA0473A1A8B19EEF4A9EF7128C56
SymbolHoldTriggerEvaluator.class	E2591BD905978126A984A943ABB710F15C5E51FC
SymbolSwapSpinShapeEvaluator.class	2F101CB1D95B84E4AB7FC87D38988ED2FD0022BC
SymbolSwapSpinTriggerEvaluator.class	B874F1C346CEF235FCB49E7D8D1E877A118BD104
TriggerRandomMultiplierEvaluator.class	49C866693BB63FD8D9A0459AE248EC5352261F92



Game Inspection

Descriptions of the submitted game is given below.

“Fondant Favourites StarTrail”

“Fondant Favourites StarTrail” is a 5x3 video slot with 20 fixed paylines. The game has Star Trail feature for both base and free spins. The free spins can be retriggered.



Game Inspection

GLI's Game Inspection of the game included (but was not necessarily limited to) the following elements to the extent necessary to evaluate the game for compliance with the requirements in the standards listed on the first page:

- Evaluation of provided documentation (Test report and test results generated by iTech Labs), and
- Assessment of requirements from the Assessment Scheme based on the provided evidences.

GLI has not performed an independent calculation of the theoretical Percentage Return to Player (RTP%) values of the game. The results are shown in the table below are based on the Test report and test results generated by iTech Labs:

Game Name	Supplier's Paytable ID	In Game %RTP	Supplier's Submitted %RTP	Test lab evaluated Game %RTP
Fondant Favourites StarTrail	93%	93.066%	93.066%	93.073%

Jurisdictional Requirements

Documentation used for the Inspection

Document N°	Document Title	Version/Date of Issue
1	ITL2402076_Eyecon_FondantFavouritesStarTrail_NL_05Aug2024	5 August 2024
2	FondantFavouritesStarTrail_Artwork_Game_Rules_Mobile_NL_93.066%_29Jul24 FondantFavouritesStarTrail_Artwork_Game_Rules_PC_NL_93.066%_29Jul24 FondantFavouritesStarTrail_Artwork_Game_Rules_Mobile_UK_93.066%_29Jul24 FondantFavouritesStarTrail_Artwork_Game_Rules_PC_UK_93.066%_29Jul24	29 July 2024
3	RN-246-EYL-24-01-609	17 July 2024
4	Eyecon_2400005_FondantFavouritesStarTrail_FinalMathReport	N/A

The documents included in this table have been used during the assessment described herein and their references are noted in the 'Documentation' column of the the Inspected Items table below.

Inspected Items

Administrative Obligations Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
1 B4.4.1 ID NL: KS.01.01_2.0	Review the technical setup of the gaming system in order to confirm that the design guarantees that the records for the licensed betting and gambling activities are remotely kept strictly separated from the records of any other goods or services a service provider may provide and which do not fall under the Dutch licence.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:			
	Performed by:			
2 B4.4.2 ID NL: KS.01.02_2.0	In terms of design and implementation, confirm that the records always show clearly what amounts must be withheld due to the betting and gambling winnings levy and betting and gambling winnings tax (and, where applicable, pursuant to Section 31(f) of the Betting and Gambling Act) and what amounts will be payable to a player.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:			
	Performed by:			

Jurisdictional Requirements

Payment Transactions Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
3 B4.25.1 ID NL: KS.02.01_2.0	In terms of design and implementation, confirm that all payment transactions between the licensee and the player are carried out exclusively through the gambling account.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
4 B4.25.2 ID NL: KS.02.02_2.0	In terms of design and implementation, confirm that the licensee exclusively allows the use of payment instruments for payment transactions that:			
	a. have been issued by a credit institution registered in a Member State and which holds a licence as referred to in Article 8 of Directive 2013/36/EU or by a payment service provider registered in a Member State with a licence as referred to in Article 11 of Directive (EU) 2015/2366;	N/A	Online game assessment only. Operators responsibility	
	b. can be clearly traced back to the player.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that the player cannot credit his gambling account with money from a different payment account until his gambling account has first been credited, provided that the payment instrument in question was issued by a licensed credit institution or payment service provider (which is to say that players cannot use anonymous payment instruments).	N/A	Online game assessment only. Operators responsibility	
	Note: the assessment standards under points a and b in this standard also apply to the other payment account. Explanatory note: ‘The gambling account must be linked to a payment account at a bank or with a payment service provider (the current account). This follows from the definition of the gambling account in Section 1.1. The identity of the account holder will have been confirmed and verified by the relevant bank or payment service provider when that account was opened. The payment of the current account into the gambling account (Section 4.27(1)) confirms that the player is also the holder of the current account. In principle, the money to be waged when placing bets or gambling in licensed gambling activities must come from that current account, onto which the winnings that are obtained will similarly be paid so that they can be made available to the player. Following the initial credit of the gambling account, the player may also credit the gambling account with money from another payment account. In doing so, the player may use any payment instrument accepted by the licensee, provided that it has been issued by a licensed credit institution or payment service provider and is not an anonymous payment instrument (subsection two). The requirements under section 1a and b of the standard must be observed in relation to credit from another payment account under the second section of the standard. The player should be able to be traced back to the accounts for which they have identified themselves with the relevant payment institution.			
	Explanatory note on the meaning of “clearly”: Clear traceability to a player implies more than simply being the holder of a current account. If an individual is able to make deposits from a current account, this does not mean the funds have been clearly traced back to the player. It only confirms the individual has a current account. Verifying that the name of the current account holder matches the name on the player account provides more certainty that the current account is traceable to the player. Deposits for a specific amount made with electronic money are not always preceded by identification and verification. In the event that electronic money is accepted, this must also be traceable to the player. The aim of this standard is to prevent funds belonging to a third party (not being the holder of the player account) from being deposited in the player account.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Payment Transactions		Determination	Result/Explanation	Documentation
Article no. (B) Decree or (R) Regulation				
5 B4.27.1 ID NL: KS.02.03_2.0	In terms of design and implementation, confirm that, except for corrections, the licensee will only credit a player's gambling account with money that:			
	a. came from said player's current account or from a different payment account with a credit institution or payment service provider and can be clearly and unambiguously traced back to the player in question; and	N/A	Online game assessment only. Operators responsibility	
	b. resulted from winnings; or	N/A	Online game assessment only. Operators responsibility	
	c. resulted from free play credits (bonus) granted to the player in question.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
6 B4.27.2 ID NL: KS.02.04_2.0	In terms of design and implementation, confirm that the licensee does not credit the player's gambling account with money if:			
	a. this should exceed one or more maximum limits set by the player pursuant to Section 4.14;	N/A	Online game assessment only. Operators responsibility	
	b. the possibility of placing bets or gambling has been suspended	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
7 B4.28.2 ID NL: KS.02.05_2.0	Confirm that the design does not allow the licensee to enable a player to place bets or gamble if the balance (including any gambling credit) on his gambling account does not allow them to do so. Rule out the fact that players can end up with a negative balance on their gambling account.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
8 B4.29.2 ID NL: KS.02.06_2.0	In terms of design and implementation, confirm that the licensee will only debit a player's gambling account in favour of the player's current account after that gambling account has been credited with money from that current account, with the payment account having to meet the relevant criteria (nonanonymous). If the player switches current (bank) accounts, the foregoing shall likewise apply (in Section 4.25 of the Order in Council).	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Payment Transactions Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
9 B4.29.3-4 ID NL: KS.02.07_2.0	In terms of design and implementation, confirm that the licensee will only debit the gambling account in favour of the current account, unless the reliable, responsible and verifiable organisation of the licensed betting and gambling activities resists such a transaction:			
	a. at the player's own request;	N/A	Online game assessment only. Operators responsibility	
	b. in the event that the balance on the player's gambling account exceeds the maximum specified by the player on their profile;	N/A	Online game assessment only. Operators responsibility	
	c. in the event that the player's registration is terminated at their request in accordance with Section 4.17, under a.	N/A	Online game assessment only. Operators responsibility	
	Confirm that the aforementioned procedures are not carried out as long as a player is suspended from placing bets or gambling on the platform because the licensee has reason to believe that the player does not meet or has stopped meeting the conditions for registration.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Payment Transactions		Determination	Result/Explanation	Documentation
Article no. (B) Decree or (R) Regulation				
10 R4.11 ID NL: KS.02.08_2.0	In terms of design and implementation, confirm that the licensee systematically records the following information as part of its registration process with regard to each transaction carried out to or from a gambling account:			
	a. the identity of the player whose gambling account is debited or credited;	N/A	Online game assessment only. Operators responsibility	
	b. the date and time of the transaction;	N/A	Online game assessment only. Operators responsibility	
	c. the amount debited or credited by the transaction;	N/A	Online game assessment only. Operators responsibility	
	d. the nature of the transaction; this must take place on the basis of clearly identifiable, unique signifiers such as deposit, payment, winnings, bonus credit and other sufficiently recognisable signifiers, such that these signifiers allow others to reconstruct the course of a game;	N/A	Online game assessment only. Operators responsibility	
	e. the nature of the payment instrument used for the transaction;	N/A	Online game assessment only. Operators responsibility	
	f. the account number or another unique signifier for the payment account that has been debited or credited by the transaction;	N/A	Online game assessment only. Operators responsibility	
	g. the account number or another unique signifier for the payment instrument used for the transaction.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that the gaming system provides for the generation of reports of the transaction to or from a gambling account.	N/A	Online game assessment only. Operators responsibility	
	Confirm that the licensee records the following information in the Controledatabank for each gambling account where applicable:			
	a. any amount that is not debited in favour of the player's current account, given that the reliable, responsible and verifiable organisation of the licensed betting and gambling activities has resisted such a transaction;	N/A	Online game assessment only. Operators responsibility	
	b. the date and time of any request to credit the gambling account that the licensee has rejected due to the use of a payment instrument that is not compliant (with Section 4.27(1), heading and under a, of the Decree).	N/A	Online game assessment only. Operators responsibility	
Methods Used:		PC-TC-001, WI-FI-009		
Performed by:		GLI Europe		

Jurisdictional Requirements

Payment Transactions Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
11 B4.31.1 ID NL: KS.02.09_2.0	Confirm that the design ensures that the licensee provides the player with access to general information regarding the way in which and the conditions under which payment transactions with the player take place on the publicly accessible area of the betting and gambling interface and on the player interface.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
12 B4.31.2 ID NL: KS.02.10_2.0	Confirm that the design ensures that the licensee provides the player with access to the necessary information relating to their gambling account and the changes to the gambling account on each page or screen of the player interface.	N/A	Online game assessment only. Operators responsibility	
	This information shall in any case include:			
	a. the current balance of the gambling account;	N/A	Online game assessment only. Operators responsibility	
	b. the opening balance of the gambling account at the most recent login;	N/A	Online game assessment only. Operators responsibility	
	c. the total stake since the most recent login;	N/A	Online game assessment only. Operators responsibility	
	d. the total profits and the total losses since the most recent login, and	N/A	Online game assessment only. Operators responsibility	
	e. an overview of all transactions on the gambling account for a period of at least the last 90 days.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
13 B4.31.4 ID NL: KS.02.11_2.0	In terms of design, confirm that the licensee will, at the player's request, provide them with an overview of the transactions on the gambling account covering a period of at least the last 12 months.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

CDB Article no. (B) Decree or (R) Regulation		Determination	Result/ Explanation	Documentation
14 B5.3.1., B5.3.2., R4.19 ID NL: KS.03.01_2.0	Establish that the licence holder has a comprehensive and up-to-date data mapping process that ensures that a complete and up-to-date data mapping result is available at any given time (in relation to licence applications, in relation to changes, disruptions, etc.) and which complies with remote gambling regulations and the Ksa CDB specifications.	N/A	Online game assessment only. Operators responsibility	
	A To determine whether this is the case, establish that: <ul style="list-style-type: none"> the process is documented and that the feasibility of the process steps has been verified by an authorized independent officer of the licence holder or by an equivalent independent third party the process has been completed at least once in accordance with the process description – as part of the foregoing verification process the control measures have been validated (for example: verification of the implementation of a ‘four eyes principle’ when the process contains such a control measure) – as part of the foregoing verification process. the licence holder has a complete and up-to-date data mapping result (generally a matrix) as a result of this process 	N/A	Online game assessment only. Operators responsibility	
	B Use one or more form of substantive testing to determine whether this is the case. This will at least include a comparison procedure. This indirect procedure involves a comparison of source data and target data by means of document review, where necessary with sampling of the source (e.g. customer records) and target database (the control database). In the assessment report, justify the choice of testing and sampling.	N/A	Online game assessment only. Operators responsibility	
	C Use one or more forms of compliance testing to determine whether this is the case. This will at least include validation of the source selection made by the licence holder and verification of the correct and appropriate allocation at data element level. In the assessment report, justify the choice of testing.	N/A	Online game assessment only. Operators responsibility	
	D If applicable, use: <ul style="list-style-type: none"> Assessment results that relate to the establishment and maintenance of the integrity, exclusivity and confidentiality of individual data. Assessments of the performance of employees or systems that carry out the process. This applies to licence holders who have existing procedures and (independent) assessments. This will inter alia be the case in the following situations: <ul style="list-style-type: none"> in the event that a licence holder uses a service provider that has such assessments. in the event that the licence holder has such assessments at its disposal, for example, because this demonstrably complies with a comparable requirement to maintain a control database in another gambling jurisdiction. 	N/A	Online game assessment only. Operators responsibility	
	Explanatory information: A licence holder must be able to carry out a data mapping process on a systematic basis. The result of this process is an overview of the source data and the target data (Ksa data model) and what allocation has taken place between those two. The Ksa has described requirements and expectations of this data-mapping process in Section 3 of the CDB specifications. The outcome of this assessment should enable the Ksa (or an auditor) to verify the integrity of the CDB output it will receive in advance. Furthermore, reporting of (unintended) non-compliances or adjustments observed during the assessment is crucial to the supervision of the operation of the CDB.			
Methods Used:		PC-TC-001, WI-FI-009		
Performed by:		GLI Europe		

Jurisdictional Requirements

CDB Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
15 B5.3.1, B5.3.2., R4.19 NL ID: KS.03.02_2.0	Establish that the licence holder has an established and controlled method (procedures, systems, documentation, etc.) with which it is able to ensure that the data from its betting and gambling platform is entered into the CDB completely and in a timely manner.	N/A	Online game assessment only. Operators responsibility	
	To this end, at least establish that the licence holder has an overview of events taking place on its betting and gambling platform and the relationship thereof to all requested triggers from the Ksa reference model ('Ksa CDB data model').	N/A	Online game assessment only. Operators responsibility	
	In addition, establish that this overview meets at least the following criteria: - All triggers from the data model must be linked to events in the betting and gambling platform. Each trigger must also include an indication of how the event was detected in the gaming system. - No triggers may be missing. - Triggers that do not apply, show discrepancies or are incomplete must be designated as such, with a brief or longer explanation of why each of the triggers concerned is not applicable. - All allocations must be complete (e.g. several events can be allocated to a single trigger in the Ksa reference model).	N/A	Online game assessment only. Operators responsibility	
	Examples as explanatory information: 1. player profile; daily at 0:00 CET; automated script; only from players who had actually played the day before; 2. wok_operator; daily at 0:00 CET; automated script.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
16 B5.3.2 ID NL: KS.03.03_2.0	Establish that the licence holder uses pseudonymisation for its CDB that complies with the remote gambling regulations and the Ksa CDB specifications.	N/A	Online game assessment only. Operators responsibility	
	Establish that the pseudonymisation method for the CDB is part of the scope of periodic internal and external (security) audits.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: The Ksa publishes its specifications regarding the Control Database (CDB) on its website. These Ksa CDB specifications include guidelines on how to set up and use pseudonymisation. The output of the pseudonymisation, for example, may not exceed the number of available characters as set out in the Ksa data model. In addition, to specific guidelines, reference material (general features and functionalities of pseudonymisation) is included.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

CDB Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
17 B5.3.3 ID NL: KS.03.04_2.0	Establish that the licence holder has set up and secured appropriate (electronic) access to the CDB.	N/A	Online game assessment only. Operators responsibility	
	In any case, you must establish: a) that the regular access has been set up and secured as referred to in Section 5.3.3 of the Remote Gambling Decree; b) that if the licence holder has chosen to apply the option of additional access (for example: a gateway proxy for use by auditors), such access does not lead to (additional) security risks; c) establish that the licence holder has at least taken the following measures for access control so as to guarantee the integrity, exclusivity and confidentiality of the individual data of the CDB. <ul style="list-style-type: none"> Physical access control for areas where computer equipment linked to the CDB provides direct or indirect access to the CDB or parts thereof; Access control in respect of (operating) systems and administrative user tools that provide direct or indirect access to the CDB or parts thereof; Management and control of user roles and rights with regard to the CDB or parts thereof; Job profiles of (administrative or super) users should match any authorisations granted and user activities; An up-to-date list of roles and rights (authorisation matrix linked to job (profiles); A 'follow up' should be scheduled at least every quarter to discuss the risks and non-compliances.. 	N/A	Online game assessment only. Operators responsibility	
	Where applicable, the documentation provided by the licence holder should show that: <ul style="list-style-type: none"> There have been periodic checks at least four times a year on user activities, the separation of roles and rights and the procedures followed for entering and leaving employment and Changes by way of an authorisation matrix. A follow up has taken place to deal with (the manifestation of) risks following the identification of non-compliances in relation to access control. 	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: In Section 5.3.3 of the Remote Gambling Decree, the regulator prescribes technical and organisational measures that will at all times safeguard electronic access to the CDB and the personal data included in it. The Ksa publishes its specifications regarding the Control Database (CDB) on its website. These Ksa CDB specifications contains guidelines on access. Information regarding access appears at several locations in the Ksa CDB specifications.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

CDB Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
18 R4.20 ID NL: KS.03.05_2.0	Establish that the relevant components of the CDB are located in the Netherlands.	N/A	Online game assessment only. Operators responsibility	
	Likewise, confirm that the licence holder in any case realises that installation without impeding the exercise of the powers of the regulators.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: In MR4.20, the regulator sets out that a licence holder must ensure the installation of a CDB in the Netherlands. Being able to exercise powers means, among other things, that: a) placement may not take place in a dwelling or in a location having the same effect; as if the Control Databank were placed in a dwelling; and b) in the event of placement at a location where there are restrictions that have a limiting effect, arrangements must have been made to temporarily or permanently remove this obstruction if the Ksa wishes to exercise its powers. The Ksa publishes its specifications regarding the Control Database (CDB) on its website. These specifications include instructions on which components of a CDB are in any case eligible for installation in the Netherlands.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

CDB Article no. (B) Decree or (R) Regulation		Determination	Result/ Explanation	Documentation
19 R4.12 ID NL: KS.03.06_2.0	Establish that the licence holder or prospective licence holder has a control plan and an exit plan.	N/A	Online game assessment only. Operators responsibility	
	A) Establish that both plans substantively meet the requirements and expectations as stated in the CDB specifications of the Ksa.	N/A	Online game assessment only. Operators responsibility	
	B) In particular, establish with regard to the control plan that: <ul style="list-style-type: none"> The control measures have been drawn up taking account of best practices and internationally harmonised standards, e.g. ISO27002; The management measures have been set up and are being implemented (insofar as the latter is necessary in relation to the associated risk); There is a mitigation plan for any residual and other risks; The individual management measures and risks are assigned to a responsible officer; This officer has sufficient authority to perform the required tasks under this responsibility. 	N/A	Online game assessment only. Operators responsibility	
	C) In particular, establish that the exit plan contains the solutions for the exit scenarios. Indicate in a statement which validation method has been used, depending on the scenarios. Two examples: (a) In case a third party has been contracted to take over the management of the CDB in the event of liquidation: establish that there is a contract signed by authorised officers, validating whether the service description corresponds to the solution described in the exit plan and the intended effect thereof. (b) In the case of an advance payment of 12 months: establish the presence and payment of at least one invoice.	N/A	Online game assessment only. Operators responsibility	
	D) In addition, establish that: <ul style="list-style-type: none"> Both plans are substantively in line with the way the CDB is set up or that both are representative of an intended set-up. For example: validate the control measures against a CDB design or CDB configuration document. All components must be accounted for. Where possible, use an internal statement of the licence holder or prospective licence holder indicating applicability or allocation; Both plans are up to date: < 1 year; Both plans have been adopted (and, where possible, signed) by the most senior person with final responsibility; The person with final responsibility is authorised to do so; Both plans are managed by a responsible officer, including the establishment and implementation of a procedure to maintain the plans in an auditable manner; A procedure has been established and is being implemented whereby new versions of both plans are made available to Ksa immediately after adoption. 	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: the Ksa publishes its specifications regarding the Control Database (CDB) on its website. These specifications contain expectations in respect of the control and exit plan. In summary: <ul style="list-style-type: none"> The control plan must contain all management measures around a CDB (including a risk overview). The exit plan deals specifically with termination of a CDB. NB: an exit plan may also be a chapter, separate or otherwise, of a control plan.			
Methods Used:		PC-TC-001, WI-FI-009		
Performed by:		GLI Europe		

Jurisdictional Requirements

CRUKS		Determination	Result/Explanation	Documentation
Article no. (B) Decree or (R) Regulation				
20 B4.18.1-3 ID NL: KS.04.01_2.0	1. In terms of design, confirm that			
	a. the licensee's gaming system will automatically consult the Netherlands Gambling Authority's Central Register every single time a player signs up, thus confirming access to the Register.	N/A	Online game assessment only. Operators responsibility	
	b. Confirm that this consultation involves a unique code (CRUKS code) and the playerspecific data regarding the player who seeks to sign in;	N/A	Online game assessment only. Operators responsibility	
	2. The licensee only allows a player to sign in once it has been confirmed that the player's name is not included in the Register.	N/A	Online game assessment only. Operators responsibility	
	3. In terms of design confirm that a service interruption protocol is in place, which must at the very least include the following steps:			
	a. the Board of Directors (Netherlands Gambling Authority) will be notified of the service interruption and its impact at once;	N/A	Online game assessment only. Operators responsibility	
	b. CRUKS will be consulted as soon as possible after the service interruption has been resolved; players signed in in the meantime will be checked after the service interruption;	N/A	Online game assessment only. Operators responsibility	
	c. the players whose names appear in CRUKS and who signed in during the service interruption will be signed out;	N/A	Online game assessment only. Operators responsibility	
	d. information will be provided on the measures taken;	N/A	Online game assessment only. Operators responsibility	
	e. information will be provided showing how many players were granted access to the organised betting and gambling activities during the service interruption; and	N/A	Online game assessment only. Operators responsibility	
	f. information will be provided on how many players were signed out immediately following a consultation of CRUKS;	N/A	Online game assessment only. Operators responsibility	
	g. the gaming system will keep track of which persons signed in during the service interruption, and show which of these persons were not checked in the Register.	N/A	Online game assessment only. Operators responsibility	
Testing Methods Used:		PC-TC-001, WI-FI-009		
Performed by:		GLI Europe		

Jurisdictional Requirements

CRUKS Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
21 B20.3 ID NL: KS.04.02_2.0	In terms of design and implementation, confirm that the licensee exclusively uses the citizen service number (BSN: burgerservicenummer):			
	- to consult CRUKS upon registration of a player;	N/A	Online game assessment only. Operators responsibility	
	- to verify the identity of a player;	N/A	Online game assessment only. Operators responsibility	
	- any other use permitted on the basis of other laws and regulations.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that the BSN will be removed from the licensee's records immediately after receipt of the CRUKS code.	N/A	Online game assessment only. Operators responsibility	
	Testing Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
22 B22 ID NL: KS.04.03_2.0	In terms of design and implementation, confirm that certain persons at the licensee with specific levels of authorisation are able to review the results of CRUKS consultations.	N/A	Online game assessment only. Operators responsibility	
	Testing Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

IT Systems Management Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
23 B4.40, R3.27.3 ID NL: KS.05.01_2.0	In terms of design and implementation, confirm that the IT systems management meets the following minimum requirements:			
	- the licensee has documented procedures in place for the management of incidents and problems;	N/A	Online game assessment only. Operators responsibility	
	- incidents are recorded, classified, analysed and resolved. These steps must be documented by the licensee;	N/A	Online game assessment only. Operators responsibility	
	- problems are recorded, classified, analysed and resolved. These steps must be documented by the licensee. 'Problems' are understood to include incidents that are recurring or do not have a clear cause;	N/A	Online game assessment only. Operators responsibility	
	- the licensee has documented procedures in place for change and release management;	N/A	Online game assessment only. Operators responsibility	
	- modifications made to IT systems are recorded and accompanied by a description and explanation;	N/A	Online game assessment only. Operators responsibility	
	- modifications are not authorised by a competent officer until after their impact has been evaluated and recorded;	N/A	Online game assessment only. Operators responsibility	
	- the licensee has detailed and documented procedures which outline how systems are configured and maintained;	N/A	Online game assessment only. Operators responsibility	
	- the licensee has detailed and documented procedures for the management of its systems' and infrastructure's availability and capacity;	N/A	Online game assessment only. Operators responsibility	
	- the licensee has detailed and documented procedures for the management of the IT related aspects of its financial management;	N/A	Online game assessment only. Operators responsibility	
	- the licensee has detailed and documented procedures for the management of internal and external service levels.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Registration and sign-in procedures Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
24 B4.11 ID NL: KS.06.01_2.0	In terms of design and implementation, confirm that a player cannot be registered if the licensee does not have the following information:			
	- name;	N/A	Online game assessment only. Operators responsibility	
	- first name(s);	N/A	Online game assessment only. Operators responsibility	
	- date of birth;	N/A	Online game assessment only. Operators responsibility	
	- place of birth;	N/A	Online game assessment only. Operators responsibility	
	- citizen service number (BSN) (if held by the player);	N/A	Online game assessment only. Operators responsibility	
	- physical address;	N/A	Online game assessment only. Operators responsibility	
	- email address;	N/A	Online game assessment only. Operators responsibility	
	- phone number;	N/A	Online game assessment only. Operators responsibility	
	- account number or other unique signifier of the current account and the name of the holder of the current account;	N/A	Online game assessment only. Operators responsibility	
	- type of identity document;	N/A	Online game assessment only. Operators responsibility	
	- number of the identity document;	N/A	Online game assessment only. Operators responsibility	
	- data and place of issue of the identity document.	N/A	Online game assessment only. Operators responsibility	
	In term of design and implementation, confirm that the licensee for each player during the registration process:			
	- has requested a (copy of) a valid identity document;	N/A	Online game assessment only. Operators responsibility	
	- determined whether the name of the current account corresponds to the specified name of the player;	N/A	Online game assessment only. Operators responsibility	
	- validates the e-mail address or telephone number;	N/A	Online game assessment only. Operators responsibility	
	- the date of birth functionality has been configured in such a way that only adults can sign up.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Registration and sign-in procedures Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
25 B4.12 ID NL: KS.06.02_2.0	In terms of design, confirm that before registering new players, the licensee will consult the Register, using the player’s surname, first name, date of birth, place of birth and citizen service number (if the player has one) as stated on the player’s identity document.	N/A	Online game assessment only. Operators responsibility	
	In terms of design, confirm that a player is granted access if a consultation of the Register with the player’s unique code (CRUKS code) has taken place and the consultation results in a ‘nohit’ (no error notification response and the player is not known to CRUKS).	N/A	Online game assessment only. Operators responsibility	
	In terms of design, confirm that players will not be registered if a consultation of the Register results in an invalid request for information (404 and no result) or a valid request for information with the notification that the player is known to CRUKS (200 + CRUKS code + registered).	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
26 B4.14 ID NL: KS.06.03_2.0	In terms of design and implementation, confirm that a player is required to indicate: - the limits of their gambling behaviour and that these limits must pertain to:			
	a. the maximum amount of time per day, week or month a player must be allowed access to the player interface;	N/A	Online game assessment only. Operators responsibility	
	b. the maximum daily, weekly or monthly amounts of money to be deposited into the player’s gambling account; and	N/A	Online game assessment only. Operators responsibility	
	c. the maximum amount of money to be held in the player’s gambling account.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that the player has set out the limits of their gambling behaviour during registration.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that appropriate measures are in place to ensure that the above-mentioned limits cannot be exceeded.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that players are able to change these limits at all times, with a reduction of one or more maximum limits taking effect immediately and an increase of one or more maximum limits taking effect after at least one week.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Registration and sign-in procedures Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
27 B4.15 ID NL: KS.06.04_2.0	In terms of design and implementation, confirm that the licensee will only register a person as a player after that person has stated:			
	a. to be familiar with the information referred to in Section 4.34, Section 8 and Section 9 of the Decree on Recruitment, Advertising and Betting and Gambling Addiction Prevention;	N/A	Online game assessment only. Operators responsibility	
	b. to have full legal capacity;	N/A	Online game assessment only. Operators responsibility	
	c. to only bet and gamble on their own account;	N/A	Online game assessment only. Operators responsibility	
	d. that they will not use their registration to launder money or finance terrorism, violate sanctions, or commit fraud involving the licensed betting and gambling activities, or misuse the licensed betting and gambling activities; and	N/A	Online game assessment only. Operators responsibility	
	e. will treat the identity verification instruments used in the registration procedure with due care, take all reasonable measures to prevent third parties from using them and to this end, where necessary, follow the guidelines as imposed by the licensee.	N/A	Online game assessment only. Operators responsibility	
	In terms of design, confirm that the licensee will not register a person as a player if it is aware or can be reasonably expected to suspect that the declaration as specified above is incorrect.	N/A	Online game assessment only. Operators responsibility	
	<p>Explanatory note:</p> <p>Before a person can be registered as a player, they must provide a number of statements. In practice, this can be done fairly easily, for example, by ticking an affirmative answer to the question of whether they are willing to make that statement. As a prospective player, the person involved will be expected to make these statements in accordance with the truth, thereby fulfilling the requirements regarding their own responsibility. If the licensee is aware or reasonably suspects that the statements are inaccurate, this leads to a higher risk of betting and gambling carried out by a vulnerable player or of gambling-related crime, and it may not register the relevant person as a player. The licensee may also suspect that the statement is inaccurate if the person concerned is someone who was previously registered as a player with the licensee and therefore has information to the detriment of that player.</p> <p>The licensee may also rely on external indicators. If necessary, it will conduct a further investigation into the matter. If, following registration, it appears that the player has not made the self-declaration truthfully, the registration will be terminated (Section 4.17).</p>			
Methods Used:		PC-TC-001, WI-FI-009		
Performed by:		GLI Europe		

Jurisdictional Requirements

Registration and sign-in procedures Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
28 B4.17, B4.19, B4.20, R3.18 ID NL: KS.06.05_2.0	In terms of design and implementation, establish that the licence holder will suspend the player from placing bets or gambling on the licensed platform in the following cases:			
	a) at the request of the player;	N/A	Online game assessment only. Operators responsibility	
	b) in the case of a reasonable suspicion that the player does not or no longer meets the conditions for registration;	N/A	Online game assessment only. Operators responsibility	
	c) in the case of a reasonable suspicion that the player may cause harm to themselves by betting or gambling to an excessive degree or because of their gambling addiction, where the licence holder has notified the Board of Directors regarding the player in accordance with Section 31m(4) of the Act.	N/A	Online game assessment only. Operators responsibility	
	In terms of design, establish that the licence holder will suspend the player from placing bets and gambling on the licensed platform in the event that a) the licence holder has reason to suspect that the player does not or no longer meets the conditions for registration and b) the licence holder has reason to believe that the player may cause themselves or their loved ones harm by betting or gambling to an excessive degree or because of their gambling addiction, where the licence holder has notified the Board of Directors regarding the player in accordance with Section 31m(4) of the Act.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that if, in the above-mentioned two cases, the licence holder has suspended a particular player from placing bets or gambling on its platform, it will investigate the grounds for that suspicion, and the player will be suspended from using the platform pending the investigation.	N/A	Online game assessment only. Operators responsibility	
	<p>Explanatory note:</p> <p>The licence holder shall suspend the player from being able to place bets and gambling on the licensed platform for up to six months in the cases referred to in Section 4.19(1)(b) and (c) of the Decree. Namely:</p> <p>b. in the case of a reasonable suspicion that the player does not or no longer meets the conditions for registration;</p> <p>c. in the case of a reasonable suspicion that the player may cause harm to themselves by betting or gambling to an excessive degree or because of their gambling addiction, where the licence holder has notified the Board of Directors regarding the player in accordance with Section 31m(4) of the Act.</p> <p>Explanatory note:</p> <p>If the licence holder has suspended a particular player from placing bets or gambling on its platform because it has reason to believe that the player does not or no longer meets the conditions for registration (Section 4.19(1)(b)), it must investigate the grounds for that suspicion. The player will be suspended from using the platform pending the investigation. If the licence holder has suspended a player from placing bets and gambling on its platform because it suspects that the player in question has a gambling problem, and if the licence holder has notified the Ksa as required by Section 4.19(1)(c) of this player's behaviour with a view to getting them involuntarily entered into the Central Exclusion Register, the player will be suspended until such time as the Ksa has entered the player in question into the Register or until such time as the licence holder has indicated that it does not see sufficient grounds to do so.</p>			
Methods Used:		PC-TC-001, WI-FI-009		
Performed by:		GLI Europe		

Jurisdictional Requirements

Registration and sign-in procedures Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
29 B4.21 ID NL: KS.06.06_2.0	In terms of design, confirm that if the player is suspended from placing bets and gambling on the licensed gambling platform, this will not affect the player’s ability to access the information related to their gambling account.	N/A	Online game assessment only. Operators responsibility	
	Also confirm that the design ensures that the player’s ability to transfer money from a debit account to a gambling account and, depending on the reason for the suspension, from the player’s gambling account to their current account, is restricted.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note on suspension and transfers: If a player is suspended from the licensed gaming system, this should not affect the player’s access to the information relating to his gambling account. The licensee must also allow the player to review their balance and the overview of previous transactions in the event of suspension. However, the player’s ability to transfer money from a debit account to a gambling account and, depending on the reason for the suspension, from the player’s gambling account to their current account, will be restricted pursuant to Section 4.27 and Section 4.29.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
30 B4.22 ID NL: KS.06.07_2.0	In terms of design, confirm that the licensee will prevent the player from being able to sign in once a player’s registration has been terminated.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: Players whose registration has been terminated will no longer be able to sign in – this will remain the case in perpetuity. If the player wishes to bet and gamble with the gambling provider again, then the player must register again.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
31 B4.23 ID NL: KS.06.08_2.0	In terms of design, confirm that the licensee has implemented appropriate technical and organisational measures to prevent people from being signed in continuously and from signing in without authorisation. If the identification method used by the licensee is a combination of the player’s username and password, it may be worth implementing specific measures that require players to manually enter this combination before being allowed to place bets or gamble.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: An appropriate measure for continuous signing in inter alia is a timeout.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Registration and sign-in procedures Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
32 R3.16 ID NL: KS.06.09_2.0	In terms of design and implementation, confirm the licensee will put in place appropriate measures if there is a reasonable suspicion of abuse of identifiers in the case of abnormalities in the usual method of signing in, and that it has a procedure in place to inform the player without delay.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note on appropriate measures: In order to prevent fraud and cases of abuse, the licensee must be able to ensure that it only allows persons to sign in if they are registered with the licensee as a player. To this end, the licensee will make available personal identifiers, as referred to in Section 4.15(1)(e) of the Remote Gambling Decree. It cannot be ruled out that the personal identifiers – despite the measures taken by the licensee to prevent abuse – will be used by another person than the player to whom the identifiers have been granted and that other measures that serve to prevent other persons from signing in with the gambling account of the player are bypassed, for example, by using an email or phone control notification. The licensee must be aware of this, for example, in the event another computer or phone than usual is used to signed in, the player's password is changed or multiple attempts are made to sign in with an incorrect password. The licensee must take appropriate measures to mitigate such cases to prevent fraud and adverse consequences for the player and must inform the player as soon as possible. If necessary, the licensee may temporarily block the signing in process.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
33 R3.17 ID NL: KS.06.10_2.0	In terms of design, implementation and operation, confirm that the licensee has put in place appropriate measures to exclude the player from placing bets and gambling on the licensed platform in the following cases: a. persons as referred to in Section 4.6 of the Decree and other persons involved in the organisation of the licensed betting and gambling facilities.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
34 B4.26.1 ID NL: KS.06.11_2.0	In terms of design, confirm that the licence only allows players to create one single gambling account and does not allow gambling accounts to be created by persons who are not registered with the licensee's platform as players.	N/A	Online game assessment only. Operators responsibility	
	In terms of design, confirm that the gaming system is set up in such a way that gambling accounts can only be opened after the person involved has been registered as a player, and that the gambling account is closed when the player's registration is terminated.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Registration and sign-in procedures Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
35 B4.26.2 ID NL: KS.06.12_2.0	In terms of design, confirm that the licensee credits and debits players' gambling accounts without undue delay. This means that all deposits, stakes, winnings and credits granted must appear in the player's gambling account as soon as possible.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: Section 4.26(2) of the Order in Council sets out that 'The licensee must ensure that credits and debits to players' gambling accounts are carried out as quickly as possible at all times. This means that all deposits, stakes, winnings and credits granted must appear in the player's gambling account as soon as possible. It is vital to players that the balance on their gambling account always reflects the latest state of affairs, so they are aware of what level of credit they still have. In addition, credits in relation to a payment request may not be held by the licensee for an unnecessarily long period of time, for example to grow interest. The second subsection does not prejudice the possibility, where appropriate, of payment being made only once an investigation into irregularities has been completed			
	Methods Used:			
	Performed by:			
36 B4.26.3 ID NL: KS.06.13_2.0	In terms of design and implementation, confirm that the licensee will only permit a single current account per player.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:			
	Performed by:			
	Methods Used:			

Jurisdictional Requirements

Quality Management System Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation Refer to Notes
37 B4.40 ID NL: KS.07.01_2.0	In terms of design and implementation, establish that:			
	- The licence holder has established a described quality management system that provides for the continuous improvement of products and services, ensures an addiction prevention policy is implemented and implements internal supervision.	N/A	Online game assessment only. Operators responsibility	
	In this context, establish that the described quality management system contains the following components:			
	- The licence holder has documented the characteristics of its products and services.	N/A	Online game assessment only. Operators responsibility	
	- The licence holder has documented all processes that may in any way affect players, as well as the expected results.	N/A	Online game assessment only. Operators responsibility	
	- The licence holder has procedures to structurally evaluate and, where necessary, improve processes, products, services and compliance with laws and regulations.	N/A	Online game assessment only. Operators responsibility	
	- The licence holder assesses its addiction prevention policy in terms of its effectiveness in combating excessive participation in or risks of addiction to gambling, or the development thereof, on at least an annual basis.	N/A	Online game assessment only. Operators responsibility	
	- The licence holder updates its addiction prevention policy if evaluation of the policy, advice from addiction care, laws and regulations or scientific developments so require.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
Information Security Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
38 B4.40, R3.27.1 ID NL: KS.08.01_2.0	In terms of design and implementation, establish that the licence holder has an information security system with a management cycle that provides for continuous improvement of information security. The management cycle is used for the identification and mitigation of risks.	N/A	Online game assessment only. Operators responsibility	
	Establish that the information security system includes the protection of assets, the processing of personal data and the transactions of player funds.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
39 b4.40, R3.27.1 ID NL: KS.08.02_2.0	In terms of design, establish that there is an information security policy.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Information Security Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
40 b4.40, R3.27.1 ID NL: KS.08.03_2.0	Establish that, with regard to information security, the licence holder has the following information in documents in terms of design :			
	- An established information security policy no older than one year;	N/A	Online game assessment only. Operators responsibility	
	- The scope of the information security management;	N/A	Online game assessment only. Operators responsibility	
	- The way in which a risk assessment is performed;	N/A	Online game assessment only. Operators responsibility	
	- The jobs or job profiles, competencies and responsibilities with regard to information security;	N/A	Online game assessment only. Operators responsibility	
	- The security measures;	N/A	Online game assessment only. Operators responsibility	
	- A description of the implementation and results of the management cycle.	N/A	Online game assessment only. Operators responsibility	
	Establish that, in terms of implementation , the documentation provided shows that:			
	- The risk assessment evaluation and follow-up are carried out in accordance with the pre-determined set-up;	N/A	Online game assessment only. Operators responsibility	
	- The activities performed correspond to the responsibilities regarding information security;	N/A	Online game assessment only. Operators responsibility	
	- Appropriate security measures have been applied;	N/A	Online game assessment only. Operators responsibility	
	- The management cycle has been implemented and the results evaluated and – where necessary – followed up.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
41 b4.40, R3.27.1 ID NL: KS.08.04_2.0	In terms of design and implementation, establish that the licence holder will carry out an annual penetration as part of the risk evaluation.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
42 b4.40, R3.27.1 ID NL: KS.08.05_2.0	In terms of design and implementation, establish that the licence holder has taken measures to ensure follow-up of security incidents.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Information Security Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
43 b4.40, R3.27.1 ID NL: KS.08.06_2.0	In terms of design and implementation, establish that the licence holder has taken general organisational measures to guarantee information security.	N/A	Online game assessment only. Operators responsibility	
	In this context, at least the following items are required: - functions and responsibilities; - separation of functions; - mobile devices and teleworking; - periodic monitoring of user activities.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
44 b4.40, R3.27.1 ID NL: KS.08.07_2.0	In terms of design and implementation, establish that the licence holder has specified measures for human resources and safety.	N/A	Online game assessment only. Operators responsibility	
	In this context, at least the following items are required: - screening; - employment conditions; - Management responsibilities; - awareness of and training on information security; - allocation and revocation of roles, user rights and the right to use company assets; - disciplinary procedures; - responsibilities in connection with termination or change of employment.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
45 b4.40, R3.27.1 ID NL: KS.08.08_2.0	In terms of design and implementation, establish that the licence holder has specified measures for the management of assets.	N/A	Online game assessment only. Operators responsibility	
	In this context, at least the following items are required: - responsibility for assets; - classification of information; - the use of data carriers and other media.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Information Security Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
46 b4.40, R3.27.1 ID NL: KS.08.09_2.0	In terms of design, establish that the licence holder has implemented access control measures.	N/A	Online game assessment only. Operators responsibility	
	The following items are required in terms of design : - access control requirements; - user access management; - responsibilities of users; - access control for systems and applications. - After deviations in the design of access control are established, there will be a follow-up to mitigate (the resulting manifestation of) risks.	N/A	Online game assessment only. Operators responsibility	
	In terms of design , documentation must show that: - there are periodic checks, at least four times a year, on user activities, separation of roles and rights and the procedures followed for entry and exit and changes; - after deviations in the implementation of access control are established, there will be a follow-up to mitigate risks or resulting risks.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
47 b4.40, R3.27.1 ID NL: KS.08.10_2.0	In terms of design and implementation, establish that the licence holder has implemented measures for cryptography.	N/A	Online game assessment only. Operators responsibility	
	In this context, at least the following items are required: - cryptography policy; - key management.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
48 b4.40, R3.27.1 ID NL: KS.08.11_2.0	In terms of design and implementation, establish that the licence holder has taken measures for operational security related to the gaming system. In any case, the following items are required: - operational procedures and responsibilities; - protection against malware; - backup copies or backup files; - automated reporting, recording and monitoring; - enterprise software management; - management of technical vulnerabilities; - configurations for the control of information systems.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Information Security Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
49 b4.40, R3.27.1 ID NL: KS.08.12_2.0	In terms of design and implementation, establish that the licence holder has taken measures to secure communications. In this context, at least the following items are required: - network security management; - information transfer.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
50 b4.40, R3.27.1 ID NL: KS.08.13_2.0	In terms of design and implementation, establish that the licence holder has taken measures for the acquisition, development and maintenance of systems. In this context, at least the following items are required: - security requirements for information systems; - security in development and support processes; - test data.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
51 b4.40, R3.27.1 ID NL: KS.08.14_2.0	In terms of design and implementation, establish that the licence holder has its own measures for information security specifically aimed at suppliers and outsourced services.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
52 b4.40, R3.27.1 ID NL: KS.08.15_2.0	In terms of design and implementation, establish that the licence holder carries out a risk assessment. The information security aspects of business continuity and fall-back options in case of incidents must be included.	N/A	Online game assessment only. Operators responsibility	
	Testing Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
53 b4.40, R3.27.1 ID NL: KS.08.16_2.0	In terms of design and implementation, establish that the licence holder has taken measures to ensure compliance with legal and contractual requirements and information security testing.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
54 R3.11 ID NL: KS.09.01_2.0	In terms of design, confirm that the licensee identifies, analyses and evaluates potential integrity risks and always includes the following issues in its considerations:			
	a. the relevant characteristics of players;	N/A	Online game assessment only. Operators responsibility	
	b. the payment transactions and the payment instruments authorised by the licensee and used by players;	N/A	Online game assessment only. Operators responsibility	
	c. the geographic location of players;	N/A	Online game assessment only. Operators responsibility	
	d. the behaviour of players, including at least their gambling behaviour.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note The geographic location from which players sign in may pose an integrity risk. Such risks may include players who log into their Dutch gambling account from abroad, in particular if this takes place from countries that are subject to sanctions. Another example of an integrity risk is if attempts are made to log in simultaneously or in short succession from various locations or attempts to log into the same gambling account, particularly if there are large physical distances between these locations. This may be a sign that someone is attempting to log in under a different name or that an attempt is being made to gain unauthorised access to a gambling account. Where the likelihood of collusion, as referred to in the foregoing, is greater, if players are registered at the same address, this will also be the case if multiple players are placing bets or gambling in the same game of chance from the same location.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
55 R3.2.2 ID NL: KS.09.02_2.0	In terms of design, implementation and operation, establish that the licence holder has ensured that the gaming system is configured in such a way that players will not be able to bet or gamble against themselves.	N/A	Online game assessment only. Operators responsibility	
	To this end, the gaming system must, inter alia, prevent multiple players from using the same device at once.	N/A	Online game assessment only. Operators responsibility	
	License holders are not permitted to allow players to create more than one gambling account.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
56 R3.4.1 ID NL: KS.09.03_2.0	terms of design, establish that the licence holder only uses names for the games on offer that match the types of game actually being played (poker, roulette, betting, etc.).	PASS		Ref. 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
57 R3.6 ID NL: KS.09.04_2.0	In terms of design, establish that the licence holder will only award non-cash prizes to people who have actually won them and that the licence holder will not do so until it has reliably confirmed and verified the player's identity and current account as specified in the foregoing standards.	N/A	No Non-cash prizes advertised in game.	Ref 1, Ref 2
	Non-cash prizes must also be documented in such a way that they can be traced back to the player's person.	N/A	No Non-cash prizes advertised in game.	Ref 1, Ref 2
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
58 R3.7 ID NL: KS.09.05_2.0	In terms of design and implementation, establish that devices cannot automatically begin taking part in betting or gambling activities without the input of the player.	PASS		Ref 1
	In terms of design and implementation, establish that a player will not begin participating in a game until they press a real or virtual button to confirm their stake.	PASS		Ref 1
	In terms of design and implementation, confirm that games against the licensee do not include any form of automatic stakes.	PASS		Ref 1
	In terms of design and implementation, establish that the so-called auto-play functionality can only be used after the start of a game where another player is played at the same time.	N/A	Auto play is not available	Ref 1, Ref 2
	Explanatory notes on stakes and auto play: The stake in a game can also take the form of stakes that cannot be cashed in, such as "free spins", "bonus points", "bonus buys" or similar. The key principle in this case is that the input of a choice is the direct result of an action taken by the player. If a player does not make use of the facility made available, the gaming system can enter and record a choice – in accordance with the applicable rules of the game. In doing so, it will remain necessary for the player to place the stake themselves and, as such, auto-play for the placement of stakes is not permitted. Different types of autoplay exist. Some casino games feature a (traditional) autoplay button, which automatically places stakes for as long as sufficient gaming credit remains. The autoplay session is ended by pressing this button once more. In another variant, players are able to specify the number of consecutive games for which they wish to place automatic stakes, provided there is sufficient gaming credit. Other casino games use an indirect route, with players not indicating how much of their gaming credit they wish to use automatically and instead buying a number of "free spins" or "bonus spins". The spins are then automatically played in succession during a session that cannot be stopped early. The latter can also be referred to as "buy", "buy spins" and "buy feature". Holding down buttons on the keyboard in order to continue playing can also be regarded as a type of autoplay. Each of these cases enable a player to play consecutive games, without having to carry out any affirmative action in between in order to start the next game. Such types of autoplay are not permitted in casino games against the licensee. It may be the case that when participating in licensed gambling activities the player does not enter or cannot enter a choice to influence the course of the game, for example, if the player has taken a break. This is why casino games in which players play against each other, such as poker, have an auto-play functionality, which enters the choice required to further the course of play.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
59 R3.9 ID NL: KS.09.06_2.0	In terms of design, establish that the auto-play function operates in accordance with the rules of the game, as communicated to the player. At the very least, establish that the fairness of the function and the timeliness of choices are addressed.	N/A	Auto play is not available	Ref 1, Ref 2
	In terms of design, establish that a player cannot simply stake money on something by using the auto-play function, unless this is necessary for the progress of the game, in accordance with rules that must be easily understood by the players (e.g. blinds in a game of poker).	N/A	Auto play is not available	Ref 1, Ref 2
	Explanatory note on auto play: The key principle in this case is that the input of a choice is the direct result of an action taken by the player. If a player does not make use of the facility made available, the gaming system can enter and record a choice – in accordance with the applicable rules of the game. In this context, it must still be necessary for the player to perform an action in order to make the bet. Auto-play for betting purposes is therefore not permitted. It may be the case that when participating in licensed gambling activities the player does not enter or cannot enter a choice to influence the course of the game, for example, if the player has taken a break. This is why casino games in which players play against each other, such as poker, have an auto-play functionality that enters the choice required to further the progress of the game.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
60 R3.9a ID NL: KS.09.07_2.0	In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements:			
	a. The player is able to take part in those casino games via a direct video link.	N/A	Not a live casino game	Ref 1
	b. The direct video link and, where applicable, other communication connections and means of communication:			
	i. have been sufficiently protected against malfunctions;	N/A	Not a live casino game	Ref 1
	ii. are protected against unlawful access, unauthorised use and manipulation;	N/A	Not a live casino game	Ref 1
	c. the progress of the live casino games and the gambling behaviour of players is analysed and recorded on the basis of video surveillance and video reporting;	N/A	Not a live casino game	Ref 1
	d. the analysis and recording, as referred to under c., shall in any case be aimed at identifying and countering fraud and abuse, as well as risks of gambling addiction;	N/A	Not a live casino game	Ref 1
	e. Only personnel who have the requisite qualifications and have received training either internally or externally or have attended a training course shall be used to organise the live casino games.	N/A	Not a live casino game	Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
Performed by:	GLI Europe			
61 R3.3 ID NL: KS.09.08_2.0	In terms of design and implementation, establish that the gaming system allows the player to finish a game interrupted by malfunctions.	PASS		Ref 1
	In terms of design and implementation, establish that the gaming system provides information to the player about the status of a game interrupted by malfunctions.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
62 R3.5 ID NL: KS.09.09_2.0	In terms of design and implementation, establish that, before play commences, the gaming system provides the player with information about the possible bets and the bets selected by the player.	PASS		Ref 1, Ref 2
	In terms of design and implementation, establish that the player provides the value of their stake in money (a currency) before the game starts.	PASS		Ref 1, Ref 2
	Explanatory note: When organising remote gambling, the licence holder is free to indicate players' stakes in units other than currency, such as a representation in points or various types of chips. The licence holder shall inform the player about the use of units other than currency prior to their participation in the gambling activities. The licence holder shall also provide the player with a means by which it is clear to the player during play what amount of money they are betting or what amount of money is required as a stake. This could include a calculation tool. This makes it easier for the player to monitor their own financial or other limits, adjust their playing behaviour accordingly or even decide not to participate any longer.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
63 B4.2.3 and R3.2.1 ID NL: KS.09.10_2.0	In terms of design and implementation, establish that, with the exception of the actual betting and the actual payment of the prizes, the practice games are the same as the gambling activities offered by the licence holder.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
64 R3.2a.1 ID NL: KS.09.11_2.0	In terms of design and implementation, establish that the Random Number Generator applied is suitable for the form of gambling for which the Random Number Generator is used.	PASS		Ref 1
	Explanatory note: The Random Number Generator must be suitable to be used for the random parts of the gambling activities. The results of the random aspects of the gambling activities are directly related to the draw by means of a Random Number Generator.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
65 R3.2a.3 ID NL: KS.09.12_2.0	In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data set of at least 1,000,000 outcomes, successfully passes the below tests: <ul style="list-style-type: none"> the DIEHARD Test (Marsaglia) and; the NIST (National Institute of Standards and Technology); 	PASS		Ref 3
	For mechanical random number generators such as roulette kettles, it is possible to limit the dataset to a minimum of 1000 times the possible outcomes. Explanatory note: When using a physical die that has 6 possible outcomes, the minimum dataset is $6 * 1000 = 6000$.	N/A	Not a mechanical random number generator	Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/ Explanation	Documentation
66 R3.2.1 ID NL: KS.09.13_2.0	In terms of design and implementation, establish that each Random Number Generator is equipped with a suitable method of seeding and re-seeding so that predictability of results is avoided.	PASS		Ref 3
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
67 R3.2.1 ID NL: KS.09.14_2.0	In terms of design and implementation, establish that, except for the randomness of other players, the outcome of all chance parts of the gambling activities are based on the Random Number Generator. Exception: when using a randomness mechanism without replacement, the outcome of the random parts can be predictable to a certain extent. Examples: a second draw from a real or virtual pile of cards without the first card drawn being put back or a draw of virtual bingo without the first draw being replaced.	PASS		Ref 1, Ref 3
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
68 R3.2.1 ID NL: KS.09.15_2.0	In terms of design and implementation, establish that each outcome of the Random Number Generator, and the result it has led to in the gambling, is recorded.	PASS		Ref 1, Ref 3
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
69 R3.2.1 ID NL: KS.09.16_2.0	In terms of design and implementation, establish that the outcome of any game is determined solely by chance and the choice or choices made by the player within the framework of the game.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
70 R3.2.1 ID NL: KS.09.17_2.0	In terms of design and implementation, establish that the gambling can function in the same way, independently of the means used by the players.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
71 R3.2.1 ID NL: KS.09.18_2.0	In terms of design and implementation, establish that the odds of winning or losing expected by the player correspond to the odds generated and presented by the gambling activities.	PASS		Ref 1
	Explanatory note: constructions such as 'near miss', or similar constructions whereby situations of 'you almost won' are deliberately presented, are not permitted. For example, gambling activities in which a physical object is simulated (e.g. dice, roulette wheels, fruit machines) will have to provide fair results that are in line with expectations with regard to a physical object.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
72 R3.2.1 ID NL: KS.09.19_2.0	In terms of design and implementation, establish that, where present, the jackpot is linked to a game outcome of the gambling activities and that the jackpot is part of the prize schedule of the gambling activities.	N/A		Ref 1, Ref 2
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
73 R3.3 ID NL: KS.09.20_2.0	In terms of design and implementation, establish that the pay-out rate presented is the theoretical pay-out rate.	PASS		Ref 1, Ref 4
	Explanatory note: The theoretical pay-out rate must correspond to the pay-out rate. Below is an example with a bet of one euro. Examples: Option 1 = 0 euro (25% chance); Option 2 = 0 euro (25% chance); Option 3 = 1 euro (25% chance); Option 4 = 2 euro (25% chance). The theoretical pay-out rate = 75%.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
74 R3.2.2 ID NL: KS.09.21_2.0	In terms of design and implementation, establish that the identity of participants in gambling is known to the licence holder.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
75 R3.2.2 ID NL: KS.09.22_2.0	In terms of design and implementation, establish that, in player-to-player gambling activities, the gaming system continuously analyses for collaborating or colluding players in real time.	N/A	Single player game only. No player interaction	Ref 1, Ref 2
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
76 R3.2.2 ID NL: KS.09.23_2.0	In terms of design and implementation, establish that technical facilities are in place to recognise, analyse and record suspicious circumstances.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
77 R3.2.2 ID NL: KS.09.24_2.0	In terms of design and implementation, establish that, in player-to-player gambling activities, the participants are registered per game.	N/A	Single player game only. No player interaction	Ref 1, Ref 2
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
78 R3.3 ID NL: KS.09.25_2.0	In terms of design and implementation, establish that any deviations in a mechanical Random Number Generator are recorded.	N/A	No mechanical RNG used	Ref 1, Ref 3
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
79 R3.8 ID NL: KS.09.26_2.0	In terms of design and implementation, establish that the gaming system will accept the player's bet and participation only if the outcome of the immediately preceding game is certain.	PASS		Ref 1
	In terms of design and implementation, establish that the gaming system gives the player sufficient opportunity to influence the further course of the game.	PASS		Ref 1
	Explanatory note: Acceptance of the stake and participation shall only follow if the outcome of the preceding game is known. In relation to the last single stake for that game, the outcome must be a clear win, draw or loss. The stake in a game may also have a form that cannot be cashed in, such as "free spins", "bonus points", "bonus buys" or similar. Sufficient opportunity means there must be sufficient time to absorb information and make a choice.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
80 B4.34 and R3.4 ID NL: KS.09.27_2.0	In terms of design and implementation, establish that the rules of the game and the pay-out percentage presented for the game do not change during the game.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
81 B4.34 and R3.4 ID NL: KS.09.28_2.0	In terms of design and implementation, establish that each game is provided with as comprehensive an explanation of the game as possible, including instructions on how to play.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
82 B4.34 and R3.4 ID NL: KS.09.29_2.0	In terms of design and implementation, establish that the game explanations and related instructions do not give rise to deception or misunderstanding.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
83 B4.34 and R3.4 ID NL: KS.09.30_2.0	In terms of design and implementation, establish that the game explanations and related instructions are displayed using the tool used by the player for the gambling.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
84 B4.34, B4.38 and R3.4 ID NL: KS.09.31_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions are in any case drawn up in the Dutch language.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
85 B4.34, B4.38 and R3.4 ID NL: KS.09.32_2.0	In terms of design and implementation, establish that the game explanations and corresponding instructions are set to Dutch by default.	PASS		Ref 1
	Explanatory note: the player must be able to change their default setting after registration.			
	Methods Used:	PC-TC-001, WI-FI-009		
86 B4.34 and R3.4 ID NL: KS.09.33_2.0	In terms of design and implementation, establish that the available game explanations and related instructions are the same in all languages.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
87 B4.34 and R3.4 ID NL: KS.09.34_2.0	In terms of design and implementation, establish that game explanations and related instructions are available before the player places their bet.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
88 B4.34 and R3.4 ID NL: KS.09.36_2.0	In terms of design and implementation, establish that game explanations and corresponding instructions are also available during the game.	PASS		Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Gambling Technology		Determination	Result/Explanation	Documentation
Article no. (B) Decree or (R) Regulation				
89 B4.34 and R3.4 ID NL: KS.09.37_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions contain information on the theoretical pay-out rate of the gambling activities.	PASS		Ref 1
	In terms of design and implementation, establish that, where applicable, the pay-out percentage is displayed for different game strategies of the player.	N/A	Not a strategy game	Ref 1
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
Addiction Prevention		Determination	Result/Explanation	Documentation
Article no. (B) Decree or (R) Regulation				
90 R4.3 ID NL: KS.10.01_2.0	In terms of design and implementation, confirm that the licensee will record at least the following information in relation to each player per gambling session of the player:			
	a. a unique signifier of the gambling session, such that this gambling session can be distinguished from other gambling sessions;	N/A	Online game assessment only. Operators responsibility	
	b. the date and start time of the gambling session;	N/A	Online game assessment only. Operators responsibility	
	c. the duration of the gambling session.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		
91 B9 ID NL: KS.10.02_2.0	In terms of design and implementation, establish that, after signing in, the player gains access to the player interface within the meaning of Section 1.1 of the Remote Gambling Decree.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that the required information as set out in Section 8(1) of the Remote Gambling Decree is accessible to the player through the gambling interface and the player interface.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that the required information as set out in Section 8(2) of the Remote Gambling Decree is accessible to the player through the player interface.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that the player has the option of changing their gambling account within the meaning of Section 1.1 of the Remote Gambling Decree via the player interface.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that each accessible part of the player interface contains the following information: - what time it is in the Netherlands; - the time elapsed since the player signed in; - the player's balance on their gambling account.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, establish that the following information is displayed on the landing page of the player interface: - date and time of the player's penultimate registration as referred to in Section 1.1 of the Remote Gambling Decree.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Addiction Prevention		Determination	Result/Explanation	Documentation
Article no. (B) Decree or (R) Regulation				
92 B13 ID NL: KS.10.03_2.0	In terms of design and implementation, confirm that the licensee records at least the following information in respect of each participant in the betting and gambling activities offered on its platform:			
	a. internal and external indicators (including a high or increasing gambling frequency; long or increasingly long gambling sessions; inappropriate treatment of or language in respect of other persons; stakes or betting behaviour that are different from the stakes or bets the player has made previously; expressions of frustration or discomfort; irregular gambling hours) that point to excessive participation in the licensee's betting and gambling activities or a potential gambling addiction; and	N/A	Online game assessment only. Operators responsibility	
	b. the measures it has undertaken to comply with Section 18 of the Remote Gambling Decree.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that the licensee remotely records how often players sign in to gain access to the player interface within the meaning of Section 1.1 of the Remote Gambling Decree.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that the licensee records the foregoing information in a way that allows for early detection of excessive participation in the betting and gambling activities organised by the licensee or a potential gambling addiction.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that the licensee records the foregoing information in such a way that it can be traced back to the player's data.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Addiction Prevention Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
93 B14, B15 ID NL: KS.10.04_2.0	In terms of design and implementation, confirm that the licensee records at least the following information in respect of every participant in the betting and gambling activities offered on its platform:			
	a. the registration, referred to in Section 1.1 of the Remote Gambling Decree, and the termination thereof;	N/A	Online game assessment only. Operators responsibility	
	b. the login, referred to in Section 1.1 of the Remote Gambling Decree;	N/A	Online game assessment only. Operators responsibility	
	c. the age of the player, insofar as the player is below the age of 24;	N/A	Online game assessment only. Operators responsibility	
	d. the duration of the participation in betting and gambling activities;	N/A	Online game assessment only. Operators responsibility	
	e. the frequency of participation in betting and gambling activities;	N/A	Online game assessment only. Operators responsibility	
	f. the betting and gambling activities the player takes part in;	N/A	Online game assessment only. Operators responsibility	
	g. the limits of the gambling behaviour, referred to in Section 4.14(1) of the Remote Gambling Decree;	N/A	Online game assessment only. Operators responsibility	
	h. the changes to the limits of the gambling behaviour;	N/A	Online game assessment only. Operators responsibility	
	i. any exceeding of the limits of the gambling behaviour;	N/A	Online game assessment only. Operators responsibility	
	j. the stakes and gambling outcomes;	N/A	Online game assessment only. Operators responsibility	
	k. the payment transactions with the player;	N/A	Online game assessment only. Operators responsibility	
	l. the changes on the gambling account, referred to in Section 1.1 of the Remote Gambling Decree;	N/A	Online game assessment only. Operators responsibility	
	m. the suspension of ability to place bets or gamble.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation confirm that the licensee analyses the aforementioned data and identifies signs that may point to excessive gambling and a potential gambling addiction at an early stage.	N/A	Online game assessment only. Operators responsibility	
Methods Used:		PC-TC-001, WI-FI-009		
Performed by:		GLI Europe		

Jurisdictional Requirements

Addiction Prevention Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
94 B18 + R18, B19 ID NL: KS.10.05_2.0	In terms of design and implementation, confirm that if the analysis, referred to in Section 15 of the Remote Gambling Decree, points to excessive gambling or a potential gambling addiction, the licensee will take appropriate measures to prevent excessive gambling and gambling addiction to the best of its ability. At the very least, the holder of the licence to organise remote betting and gambling activities must implement such measures if the player exceeds a limit within the meaning of Section 4.14(2)(a) or (b) of the Remote Gambling Decree.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that in the case of a reasonable suspicion of excessive betting and gambling or gambling addiction, the licensee will initiate a personal dialogue with the player, in which:			
	a. it will make the player aware of his or her gambling behaviour and of the development thereof if possible and of the dangers of gambling addiction;	N/A	Online game assessment only. Operators responsibility	
	b. it will provide the player with advice regarding the facilities aimed at limiting their betting and gambling activities and regarding the assistance available from addiction treatment institutions, and encourage the player to make use of those facilities;	N/A	Online game assessment only. Operators responsibility	
	c. it will investigate whether the player has the potential to cause harm to themselves or to their family as a result of excessive betting and gambling or gambling addiction;	N/A	Online game assessment only. Operators responsibility	
	d. it will advise the player to make use of a facility which allows them to gain easy insight into their gambling behaviour;	N/A	Online game assessment only. Operators responsibility	
	e. it will advise the player to make use of the option of having their access to betting and gambling activities offered by the licensee on its platform restricted in accordance with a maximum period of time per visit or login session to be determined by the player or during time slots determined by the relevant player;	N/A	Online game assessment only. Operators responsibility	
	f. it will restrict the player's access to betting and gambling activities offered by the licensee on its platform to a maximum period of time per login session or during certain time slots without the player's consent;	N/A	Online game assessment only. Operators responsibility	
	g. it will advise the player to make use of the option of excluding themselves from taking part in betting and gambling activities offered by the licensee on its platform for a fixed or indefinite period of time;	N/A	Online game assessment only. Operators responsibility	
	h. it will exclude the player from taking part in betting and gambling activities offered by the licensee on its platform without their consent for a fixed or indefinite period of time.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that when the licensee conducts the investigation referred to in subsection 2(c), it will at the very least consider the impact the player's gambling is having on their financial situation, family life, health and employment status.	N/A	Online game assessment only. Operators responsibility	

Jurisdictional Requirements

Addiction Prevention Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
94 B18 + R18, B19 ID NL: KS.10.05_2.0	In terms of design and implementation, confirm that in addition to the intervention measures prescribed in accordance with Section 18(1) of the Remote Gambling Decree, the following intervention measures are applied:			
	a. to send the player messages via the player interface to make them aware of their gambling behaviour in a sufficiently effective manner;	N/A	Online game assessment only. Operators responsibility	
	b. to advise the player to make use of the option of excluding themselves from taking part in one or more betting and gambling activities or similar types of games offered by the licensee on its platform for a fixed period of time or at certain times;	N/A	Online game assessment only. Operators responsibility	
	c. to exclude the player from taking part in betting and gambling activities or similar types of games offered by the licensee on its platform for a fixed period of time or at certain times.	N/A	Online game assessment only. Operators responsibility	
	In terms of design and implementation, confirm that the intervention measure prescribed in accordance with Section 18(1) is at least tailored to:			
	a. the player's age;	N/A	Online game assessment only. Operators responsibility	
	b. the exhibited gambling behaviour;	N/A	Online game assessment only. Operators responsibility	
	c. the indicators that point to excessive betting and gambling or risks of gambling addiction;	N/A	Online game assessment only. Operators responsibility	
	d. the response of the player to previous intervention measures, insofar as such measures have been taken.	N/A	Online game assessment only. Operators responsibility	
	e. When choosing to apply an intervention measure or the simultaneous or successive application of multiple intervention measures, the licensee shall consider the necessity, effectiveness and proportionality of such measures.	N/A	Online game assessment only. Operators responsibility	
	f. The licensee offering online betting and gambling activities shall in any case implement the intervention measure, referred to in Section 18(2)(a) at such a time when the player exceeds a limit within the meaning of Section 4.14(2) (a) or (b) or the Remote Gambling Decree.	N/A	Online game assessment only. Operators responsibility	
	g. The licensee shall provide a clear and comprehensible outline of the reasons for each intervention measure when applying such measures.	N/A	Online game assessment only. Operators responsibility	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe		

Jurisdictional Requirements

Addiction Prevention Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
95 R15 ID NL: KS.10.06_2.0	In terms of design and implementation, confirm that the licensee will regularly use the player interface to remind players of the restrictions they themselves have placed on their own gambling behaviour, either by means of popups or by means of some other, equally effective type of message, whenever the player signs in or out of the online betting and gambling activities organised by the licensee, and whenever they switch to a different game.	N/A	Online game assessment only. Operators responsibility	
	Explanatory note: Effective messaging in any case means that the licensee must regularly remind the player of the limits they have set with regard to their own gambling behaviour. This section prescribes that the licensee must in any case send the player messages via the player interface, either by means of popups or by means of some other, equally effective type of message, whenever the player signs in or out of the online betting and gambling activities organised by the licensee, and whenever they switch to a different game, for example, when a player switches from a blackjack session to the virtual slot machines. This will make the player repeatedly aware of their gambling behaviour and of the intended gambling limits at times when this does not unduly hinder their gambling experience. This could otherwise lead to the popup losing its useful effect.			
	Methods Used:			
	Performed by:			
		PC-TC-001, WI-FI-009		
		GLI Europe		



Inspection Plan

Description of the inspection plan, drawn up on the basis of the features of the game system:

GLI has performed an Inspection assessment of the requirements applicable to the submitted game. The assessment consisted of the following elements:

- Evaluation of provided documentation (Test report and test results generated by iTech Labs), and
- Assessment of requirements from the Assessment Schema based on the provided evidences.

In addition to this, GLI has confirmed the scope of accreditation and test methods used for the evaluation performed by iTech Labs.



Management System

Assessment and application of the Licence holder's management system for the assessment of the risk levels of the distinct components of the game system:

Please refer to operator's change management report.

Description of the manner in which the procedures referenced in the previous paragraph are applied by the licence holder:

Please refer to operator's change management report.

Methods used in the Inspection

Explanation and justification of the methods, techniques and principles used in the inspection.

Inspection Method	Reference No	Inspection Body	Explanation
GLI Policy for Testing Checkoffs and Forms	PC-TC-001	GLI Europe B.V.	The purpose of this policy is to establish procedures for handling Regulatory (Jurisdictional/Conformance Criteria) Checkoffs and other evaluation-related forms included in a completed submission by GLI employees.
Inspection Assessments for Netherlands Remote	WI-FI-009	GLI Europe B.V.	This Work Instruction prescribes the procedure for conducting Inspection Assessments for Remote Gaming Systems, or components thereof, against the requirements detailed in the Gaming System Assessment Scheme.

The game assessed in this report was originally tested by iTech Labs under their applicable accreditation (ISO/IEC 17025 and ISO/IEC 17020) granted by NATA (Accreditation number 15690).

The tests performed by iTech Labs include (per the evaluation report for the game issued by iTech Labs):

- Game Rules & Artwork evaluation
- Functional tests
- Emulation tests
- RTP Calculations
- Source code Review
- Other records

GLI has been provided with both the Evaluation report for the game and the underlying test results for the purpose of GLI's assessment, as well as the documented procedures under which the tests were performed. These have all been evaluated by GLI.



Findings

No non-conformities were found.



Conditions of Evaluation

GLI's compliance evaluation of the game is subject to the following conditions:

GLI's compliance evaluation of the game was related only to the technical scope of work elements discussed herein. This specifically excludes any other features or functions provided by the submission not related to these elements.

GLI generated the checksums of the software and source code files using the methods stated below:

Verify+ by Kobetron™ - Verification Procedure for Files or Directories:

1. Open Verify+ by Kobetron™.
2. Select the "File" or "Directory" radio button option.
3. Select the "Browse" button and then choose the file or the top directory for which a signature is being requested.
4. Click the "Verify" button.
5. The current File/Directory being checked will be displayed in the window.
6. The program will generate the aforementioned signatures and display the results.

The game use an RNG approved in Report RN-246-EYL-24-001-609 dated 17 July 2024



Conclusion

Subject to the Conditions of Evaluation, GLI has determined that the inspected elements comply with the requirements of the applicable Technical Standard(s) of the aforementioned jurisdiction.

If you should have any questions regarding this information, please feel free to contact our office.

Sincerely,

James Boje
Managing Director EMEA
Executive