



**Verification report: ITL2401160**

**Eyecon Alderney Limited**

**Functionality Report  
General License**

**20 May 2024**

***This test report may not be reproduced, other than in full, except with the prior written permission from iTech Labs***

***This test report is valid only for the intended jurisdiction as stated in this report and has no legal value in any other jurisdiction***

**iTech Labs Italia** REA RM-1282510 [www.itechlabs.it](http://www.itechlabs.it) e-mail: [info@itechlabs.it](mailto:info@itechlabs.it)  
Piazza Guglielmo Marconi n., 15 - 00144 Roma, Italia. Tel. +39 0632803623

Head office:

**iTech Labs** ABN 80 108 249 761 [www.itechlabs.com](http://www.itechlabs.com) e-mail: [info@itechlabs.com](mailto:info@itechlabs.com)  
Suite 24, 40 Montclair Ave, Glen Waverley, VIC 3150, Australia. Tel. +61 3 9561 9955

## Verification report: ITL2401160

### 1. Identification of the certification

Type of certification report	Final Certification Report of Functionality – General License
Identification code of the report	ITL2401160
Details identifying the certification body	iTech Labs Italia REA RM-1282510 Dirección: Piazza Guglielmo Marconi n., 15 - 00144 Roma, Italy URL: <a href="http://www.itechlabs.it">www.itechlabs.it</a> Email: <a href="mailto:info@itechlabs.it">info@itechlabs.it</a>
Details identifying the report's signatory on behalf of the certification body	Alvin Rizaldi Eric Sheng Rogelio Pérez Cano (DNI 45430254X)
Target jurisdiction	Spain
Dates on which the certification work was performed	From 04 April 2024 to 20 May 2024
Publication date of the certification report	20 May 2024

### 2. Description of the certification's subject matter

Description of technical infrastructure	The set of equipment, systems, terminals, instruments and software material used by the operator for the organization, operation and development of the gambling activity. The technical game system supports all the necessary operations for the organization, operation and development of the gambling activity and the detection and recording of the corresponding transactions between the players and the operator.						
Identification of the software elements	<table border="1"> <thead> <tr> <th>Game Name</th><th>Channel</th></tr> </thead> <tbody> <tr> <td>Fluffy Favourites 10</td><td>HTML5 Desktop</td></tr> <tr> <td></td><td>HTML5 Mobile</td></tr> </tbody> </table>	Game Name	Channel	Fluffy Favourites 10	HTML5 Desktop		HTML5 Mobile
Game Name	Channel						
Fluffy Favourites 10	HTML5 Desktop						
	HTML5 Mobile						
Licensee	Not applicable						
Manufacturer	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL Contact: Robert Black ( <a href="mailto:robert.black@eyecon.com">robert.black@eyecon.com</a> )						
Product name	<table border="1"> <thead> <tr> <th>Game Name</th><th>Channel</th></tr> </thead> <tbody> <tr> <td>Fluffy Favourites 10</td><td>HTML5 Desktop</td></tr> <tr> <td></td><td>HTML5 Mobile</td></tr> </tbody> </table>	Game Name	Channel	Fluffy Favourites 10	HTML5 Desktop		HTML5 Mobile
Game Name	Channel						
Fluffy Favourites 10	HTML5 Desktop						
	HTML5 Mobile						
Product Version	<table border="1"> <thead> <tr> <th>Game Name</th><th>Version</th></tr> </thead> <tbody> <tr> <td>Fluffy Favourites 10</td><td>Lamington (1.0.5)</td></tr> <tr> <td></td><td>Tamborine (1.0.3)</td></tr> </tbody> </table>	Game Name	Version	Fluffy Favourites 10	Lamington (1.0.5)		Tamborine (1.0.3)
Game Name	Version						
Fluffy Favourites 10	Lamington (1.0.5)						
	Tamborine (1.0.3)						
In all cases the data capturer and storage regarding the components must be recorded	Not applicable ICS is out of scope (operator's responsibility)						
Critical Components and Digital Signatures	For the list of critical components, please refer to Appendix A.						
Certified access channels	Internet						
Certified websites and brand names	Not applicable						
Version of the web service for verifying player identity which is checked by the system	Not applicable						
Payment methods used during certification	Not applicable This certification is for games only						
Identification of the elements of the technical infrastructure where these are installed	Eyecon Alderney Limited games are hosted at the following location:						



## Verification report: ITL2401160

	<p>Continent 8 Technologies Limited c/o Vodafone Malta Ltd MAR Building Cannon Road Qormi QRM 9039</p> <p>Continent 8 Technologies Admiralty Tunnel 77 Queensway Rd Gibraltar GX11 1AA</p> <p>Continent 8 Technologies Data Centre 8 Centenary House La Vrangue St Peter Port Guernsey, GY1 2EY Channel Islands</p> <p>Continent 8 Technologies c/o Keppel, unit B10 IDA Ballycoolin Industrial Estate Dublin 15 D15 YN9K</p>
Other records	<p>All games specified above have never been certified for Spain. Testing was conducted on the following devices:</p> <ul style="list-style-type: none"><li>• Desktop</li><li>• iPhone XS Max</li><li>• Samsung Galaxy S20</li><li>• iPad Mini 4</li><li>• Samsung Galaxy Tab 4</li></ul>

### 3. Executive summary of the functionality certification

#### 3.1 Overall classification of functionality

Overall classification of functionality	Comply*
---	---------

#### 3.2 Summary table of the compliance with the technical requirements

Area	Total Number of Requirements	Number of Satisfactory Requirements	Number of Unsatisfactory Requirements	Number of 'Not Applicable' Requirements
1. Juego Responsable	3	0	0	3
2. Contrato. Aceptación, copia y modificaciones	3	0	0	3
3. Registro de usuario y comprobación de las prohibiciones	17	0	0	17
4. Cuenta de juego, cobros y pagos	16	1	0	15
5. Límites a los depósitos	3	0	0	3
6. Registro y trazabilidad	4	1	0	3
7. Terminales y session de usuario	13	1	0	12
8. Canales de comunicación	5	0	0	5
9. Aplicaciones de juego gratuito	1	0	0	1
10. Sistema de control interno	10	0	0	10

#### 3.3 Summary table of the specific analysis

Various specific analysis performed	Not applicable This certification is for games only
-------------------------------------	--

## Verification report: ITL2401160

### 3.3.1 Verification analysis for identity and bans

<b>Classification</b>	Not applicable This certification is for games only
<b>I. General Information</b>	
Acceptance of non-residential participants	Not applicable This certification is for games only
Permission to play without registration	Not applicable This certification is for games only
Channels for proving identity	Not applicable This certification is for games only
<b>Verification Before Activating Player Accounts</b>	
Is the service for identity verification of residents provided by the Directorate General for the Regulation of Gambling used?	Not applicable This certification is for games only
Other means for verifying the identity	Not applicable This certification is for games only
Admitted identification documents for non-residents	Not applicable This certification is for games only
Check on legal age?	Not applicable This certification is for games only
Usage of the verification service for inclusion in the RGIAJ (General Register of the Game Access Bans)	Not applicable This certification is for games only
Verification of relatives	Not applicable This certification is for games only
<b>Verification Before Granting Rewards</b>	
Usage of the verification service of General Register of the Game Access Bans (RGIAJ) every hour and ban list update	Not applicable This certification is for games only

### 3.3.2 Measures against fraud and money laundering

Availability of technical measures against fraud and money laundering	Not applicable This certification is for games only
---	--

### 3.4 Summary table of the integration tests

Area and Reference to the Requirement	Classification
<b>A.1 User registration and exclusion checks</b>	
A.1.1 Addition of user registration	Not applicable (operator's responsibility)
A.1.2 Checks on individual prohibitions	Not applicable (operator's responsibility)
A.1.3 Validation of the DNI/NIE field	Not applicable (operator's responsibility)
<b>A.2 Gambling account, amounts paid and collected</b>	
A.2.1 Correct recording of transactions on the gambling account	Not applicable (operator's responsibility)
<b>A.3 Limits on deposits</b>	
A.3.1 Depositing in excess of limits	Not applicable (operator's responsibility)
A.3.2 Deposit limit details	Not applicable (operator's responsibility)
<b>A.4 Internet. Redirection to a ".es" domain name</b>	
A.4.1 Redirection to a ".es" domain name	Not applicable (operator's responsibility)
<b>A.5 Internal Control System</b>	
A.5.1 Completeness of RUT and CJT records	Not applicable (operator's responsibility)
A.5.2. Valid certificate.	Not applicable (operator's responsibility)



**Verification report: ITL2401160**

**Certification Signature:**

Authorised by:

A handwritten signature in black ink that reads "Eric Sheng".

---

**Eric Sheng**

Project Manager

Signed By:

A handwritten signature in black ink that reads "Alvin Rizaldi".

---

**Alvin Rizaldi**

Chief Executive Officer

Signed By:

A handwritten signature in blue ink that reads "Rogelio Pérez Cano".

---

Rogelio Pérez Cano (DNI 45430254X)  
Senior Consultant

## Verification report: ITL2401160

### 4. Compliance details on the technical requirements

Area and Reference to the requirement	Classification	Observations
<b>1. Juego Responsable</b>		
OM_PLG Anexo II. 3.1 Acciones preventivas contra el juego patológico y su operativa	Not Applicable	This certification is for games only
OM_PLG Anexo II. 3.2 Acciones de sensibilización y su operativa	Not Applicable	This certification is for games only
OM_PLG Anexo II. 3.3.b) Medidas proyectadas para paliar los efectos perjudiciales del juego	Not Applicable	This certification is for games only
<b>2. Contrato. Aceptación, copia y modificaciones</b>		
RD_LIC Artículo 31.2, 3 y 4 Contrato de juego	Not Applicable	This certification is for games only
RD_LIC Artículo 33.1.b) Obligaciones del operador en relación con los participantes	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.4.2 Política de privacidad	Not Applicable	This certification is for games only
<b>3. Registro de usuario y comprobación de las prohibiciones</b>		
RD_TEC Artículo 26. Identificación de los participantes	Not Applicable	This certification is for games only
RD_TEC Artículo 27. Autorización excepcional para la comercialización ocasional de juegos de lotería	Not Applicable	This certification is for games only
RD_TEC Artículo 26. Identificación de los participantes	Not Applicable	This certification is for games only
RD_LIC Artículo 35. Registros de usuario y cuentas de juego	Not Applicable	This certification is for games only
RD_LIC Disposición adicional cuarta. Especialidades de los concursos	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.1 Contenido mínimo del registro de usuario.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.2 Conservación de copia de los documentos aportados	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.4 Servicios de verificación ofrecidos por la CNJ	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.5 Activación del registro de usuario y limitación en la participación.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.6 Revisión periódica de los registros de usuario.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.7 Cancelación del registro de usuario.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.8 Suspensión por inactividad	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.9.1 Medidas de prevención del fraude y del blanqueo de capitales.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.9.2 Registro y comunicación en relación a la suspensión cautelar del registro de usuario.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.10 Registro de usuario activo único.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.11 Identificación para el acceso	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.1.13 Información al participante sobre su última conexión.	Not Applicable	This certification is for games only
<b>4. Cuenta de juego, cobros y pagos</b>		
RD_LIC Artículo 33.1. f) Obligaciones del operador en relación con los participantes	Not Applicable	This certification is for games only
RD_LIC Artículo 35.1 y 2. Registros de usuario y cuentas de juego	Not Applicable	This certification is for games only
RD_LIC Artículo 37. 1 y 4. Pago de la participación en los juegos	Not Applicable	This certification is for games only
RD_LIC Artículo 38. 1 y 2. Abono de los premios	Not Applicable	This certification is for games only
RES_TEC Anexo 1. 2.2.1 Funcionalidad de la cuenta de juego	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.2.2 Procedimiento de control de los depósitos de los participantes.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.2.3 Historial en tiempo real de al menos últimos 30 días	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.2.3 Historial en tiempo real por año natural para usuarios registrados.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.2.3 Historial por año natural para usuarios sin cuenta de juego en un plazo máximo de 10 días.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.2.4 Unidades de la cuenta de juego	Comply	None
RES_TEC Anexo I. 2.2.5 Prohibición de transferencias entre	Not Applicable	This certification is for games only

## Verification report: ITL2401160

participantes		
RES_TEC Anexo I. 2.2.6 Ofertas promocionales	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.2.7 Cuentas asociadas a registros de usuario en estado diferente a activo.	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.2.9 Saldo acreedor	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.3.1 Registro de las operaciones de pago y cobro	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.3.3 Procedimiento de control de las operaciones de pago y cobro	Not Applicable	This certification is for games only
<b>5. Límites a los depósitos</b>		
RD_LIC Artículo 36. Límites a los depósitos	Not Applicable	This certification is for games only
RD_LIC Anexo II. Límites de los depósitos	Not Applicable	This certification is for games only
RES_TEC Anexo I. 2.3.2 Límites de depósito	Not Applicable	This certification is for games only
<b>6. Registro y trazabilidad</b>		
RD_TEC Artículo 4.1a) y c) Requisitos de la Unidad Central de Juegos	Not Applicable	This certification is for games only
RES_TEC Anexo I. 6.1 Registro y trazabilidad	Comply	None
RES_TEC Anexo I. 6.3 Fuente de tiempo	Not Applicable	This certification is for games only
RES_TEC Anexo I. 7.5 Registro y trazabilidad en entorno de liquidez internacional	Not Applicable	This certification is for games only
<b>7. Terminales y sesión de usuario</b>		
RES_TEC Anexo I. 3.7.1 Identificación de terminales	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.1.2 Funcionalidad del terminal. Trazabilidad de las operaciones.	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.2.1 Instalación de componentes en el terminal de usuario	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.2.2 Desventaja por la calidad de la conexión.	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.2.3 Información sobre la calidad de la conexión.	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.2.4 Funcionalidad reducida para ciertos terminales.	Comply	Except for the following requirements
The participant must be informed of the information or functionality limitations of the terminal and client application being used. In such cases, there must be an express acceptance of such by the participant.	Not Applicable	Operator's responsibility
The operator shall alleviate any risks resulting from the lack of information or functionality on a particular terminal by offering the same information through other means.	Not Applicable	Operator's responsibility
All information that must appear on the interface must also appear on the terminal's interface except in cases of technical difficulties that are duly justified. In cases where it is not possible to include all information or links on the gambling interface, such information or links shall be offered via a link, menu or other application of that terminal.	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.2.5 Recursos mínimos del terminal	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.3.1 Tratamiento de los datos del participante	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.3.2 Diseño físico	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.3.3 Integridad del terminal	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.7.3.4 Terminales móviles	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.8.1 Desconexión por inactividad	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 3.8.2 Registro de las sesiones de usuario	Not Applicable	Operator's responsibility
<b>8. Canales de comunicación</b>		
RD_TEC Artículo 15.1 y 2 Actividades de juego realizadas a través de Internet	Not Applicable	Operator's responsibility
RD_TEC Artículo 16 Actividades de juego realizadas a través de mensajería de texto de servicios telefónicos fijos o móviles	Not Applicable	This requirement is not applicable to the games in this certification
RD_TEC Artículo 17 Actividades de juego a través de servicios de	Not Applicable	This requirement is not applicable

## Verification report: ITL2401160

comunicaciones por voz		to the games in this certification
RD_TEC Artículo 18 Actividades de juego a través de medios de comunicación audiovisual	Not Applicable	This requirement is not applicable to the games in this certification
RES_TEC Anexo I. 3.2 Redirección al dominio <<.es>>.	Not Applicable	This certification is for games only
<b>9. Aplicaciones de juego gratuito</b>		
RD_LIC Disposición adicional sexta. Aplicaciones de juego gratuito	Not Applicable	This certification is for games only
<b>10. Sistema de control interno</b>		
RD_TEC Artículo 13 - Sistema de control interno	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.2 Acceso de la CNJ al almacén	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.3 Modelo de datos del SCI	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.4 Fuente de tiempo del SCI	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.5 Firma, compresión y cifrado de datos del SCI	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.6 - Rendimiento del capturador y del almacén	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.8 Indisponibilidad del SCI y suspensión de la oferta de juego	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.11 Calidad de la información del SCI	Not Applicable	Operator's responsibility
RES_TEC Anexo I. 5.1.14 Ubicación del almacén en España	Not Applicable	Operator's responsibility
RES_MOD Anexo I. Modelo de datos de monitorización	Not Applicable	Operator's responsibility

## 5. Details of specific analyses

### 5.1 Identity verifications analysis and subjective bans

<b>General Information</b>	
Acceptance of non-residential participants	Not applicable This certification is for games only
Permission to play without registration	Not applicable This certification is for games only
Communication channel used for identity verification	Not applicable This certification is for games only
<b>Verification Before Activating Player Accounts</b>	
Usage of the verification service for identification provided by the National Gambling Commission for residents	Not applicable This certification is for games only
Other means for verifying the identity	Not applicable This certification is for games only
Legal Age	Not applicable This certification is for games only
Usage of the verification service for inclusion in the RGIAJ (General Register of the Game Access Bans)	Not applicable This certification is for games only
Verification of relatives	Not applicable This certification is for games only
<b>Verifications before granting a reward</b>	
Usage of the verification service of General Register of the Game Access Bans (RGIAJ) every hour and ban list update	Not applicable This certification is for games only

### 5.2 Measures against fraud and money laundering for General Licenses only

Describe the implemented measures against fraud and money laundering in the technical game system	Not applicable This certification is for games only
---	--

## 6. Details of Integration Tests

<b>Area</b>	<b>User registration and exclusion checks</b>
Test reference	A.1.1
Test name	Addition of user registration



## Verification report: ITL2401160

Test description	From the participant's point of view, registration will proceed in the case of: - A participant resident in Spain who has correct identity details, is of legal age and does not appear in the RGIAJ. - A non-resident participant. This test must be performed by all operators regardless of whether user registration is necessary for gambling or for the recording of winners.
Expected result	To be included in the result is the ID, date and time that each entry has been made, so that the National Gaming Commission can verify later that the verification services of CNJ have been consulted. In registration for non-resident, include the code used to identify the customer, date and time at which testing was performed.  FUNCTIONAL Should be validated that the user has been in the system. The system should collect from the participant all participant information fields described in Annex I section 2.1.1 RES_TEC (Please refer to the APPENDIX section at the bottom of this document) - For non-resident participant, the system should request a copy of an ID.  TRACEABILITY Analysis of the logs and system traces that collects data from user registration. Should be able to verify the traceability of the acceptance of the game contract signed by the player.
Test type	FUNCTIONAL, TRACEABILITY
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)
Qualification	Not applicable (operator's responsibility)
Observations	Not applicable (operator's responsibility)

Area	User registration and exclusion checks
Test reference	A.1.2
Test name	Checks on individual prohibitions
Test description	From the participant's point of view, registration will proceed in the case of: - A participant resident in Spain who provides incorrect identity details. - A participant resident in Spain with correct identity details, who appears in the RGIAJ. - A participant resident in Spain with correct identity details but who is underage. - A participant not resident in Spain who is underage. The test must be conducted with the operational verification services of the Directorate General for the Regulation of Gambling.
Expected result	The result will include the DNI, time and date of every registration, so that the Directorate General for the Regulation of Gambling may later confirm that its verification services have been used.  FUNCTIONAL The system must not allow the registration of minors, persons appearing in the RGIAJ or those whose verification details are incorrect.  TRACEABILITY The system's records and traces which collect the user registration details will be analysed.
Test type	FUNCTIONAL, TRACEABILITY
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)
Qualification	Not applicable (operator's responsibility)
Observations	Not applicable (operator's responsibility)

Area	User registration and exclusion checks
Test reference	A.1.3



## Verification report: ITL2401160

Test name	Validation of the DNI/NIE field
Test description	This test will verify that the internal control system uses mechanisms to avoid the following scenarios: <ul style="list-style-type: none"><li>- The introduction of wrong values into the DNI or NIE, such as, format errors, or letters not matching the number.</li><li>- The activation of a user registration despite errors in the DNI or NIE.</li><li>- Confusion of the NIE field for that of the DNI and vice versa.</li></ul>
Expected result	The actions of the system for each of the above scenarios must be described along with an assessment on such actions.
Test type	FUNCTIONAL, TRACEABILITY
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)
Qualification	Not applicable (operator's responsibility)
Observations	Not applicable (operator's responsibility)

<b>Area</b>	<b>Gambling account, amounts paid and collected</b>
Test reference	A.2.1
Test name	Correct recording of transactions on the gambling account.
Test description	From the participant's point of view, deposits and withdrawals will be made on the gambling account.  The possibility of performing other operations on the gambling account will be analysed.
Expected result	The result will include the DNI, time and date and a description of every transaction carried out, so that the Directorate General for the Regulation of Gambling may later confirm that the data is correctly recorded in the internal control system  FUNCTIONAL The proper accounting of deposits and withdrawals on the gambling account will be confirmed. If there are other operations available on the gambling account, the result will include a list of them. It will be confirmed that there is no account operation that allows a participant to receive credit from the operator or to make transfers to another participant.  TRACEABILITY The system's records and traces which collect the deposit and withdrawal details will be analysed.
Test type	FUNCTIONAL, TRACEABILITY
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)
Qualification	Not applicable (operator's responsibility)
Observations	Not applicable (operator's responsibility)

<b>Area</b>	<b>Limits on deposits</b>
Test reference	A.3.1
Test name	Depositing in excess of limits
Test description	The system will be accessed with an account that has a default daily, weekly or monthly deposit limit.  The limits will be reduced to €10, €15 and €20 respectively. Deposits under the limit will be made. Deposits over the limit will be made.  Each limit, whether daily, weekly or monthly, must be tested by using various time-frame combinations.
Expected result	FUNCTIONAL The system allows limits to be reduced.

## Verification report: ITL2401160

	The system allows deposits under the limit but does not allow deposits over the limit.  TRACEABILITY The system's records and traces which show the changes to limits will be analysed.
Test type	FUNCTIONAL, TRACEABILITY
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)
Qualification	Not applicable (operator's responsibility)
Observations	Not applicable (operator's responsibility)

Area	Limits on deposits
Test reference	A.3.2
Test name	Deposit limit details
Test description	The system's real data will be checked to ascertain how many participants have limits greater than the predetermined limits.  If there are participants who have limits greater than the predetermined limits, it will be verified that the requisite applications for increasing limits were correctly made and assessed. For the purposes of this test, a sample of 5 participants will suffice for the check.
Expected result	The result will include the identification code "PlayerID" of the analysed participants along with the dates when the applications for increasing limits were made and the dates when they were authorised. The system will be checked to ensure it keeps the records and traces of the applications, analyses and authorisations for the limit increases.
Test type	Real Data
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)
Qualification	Not applicable (operator's responsibility)
Observations	Not applicable (operator's responsibility)

Area	Internet. Redirection to a ".es" domain name
Test reference	A.4.1
Test name	Redirection to a ".es" domain name
Test description	The operator will supply the certification body with the list of websites without the ".es" domain where gambling is offered by its parent company, subsidiaries or itself.  The certification body will access each website from a Spanish IP address and verify the redirection.
Expected result	The redirection to the ".es" domain will be confirmed. The certification body will list the websites without the ".es" domain that were accessed in this test.
Test type	FUNCTIONAL
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)
Qualification	Not applicable (operator's responsibility)
Observations	Not applicable (operator's responsibility)

Area	Internal Control System
Test reference	A.5.1
Test name	Completeness of RUT and CJT records.
Test description	This test will compare the data in the SCI with the data held in the operator's



## Verification report: ITL2401160

	<p>information system for the purpose of assessing the completeness of the SCI data.</p> <p>The following monthly data will be obtained: From the monthly RUT record:</p> <ul style="list-style-type: none"><li>• Number of registrations.</li><li>• Number of participants according to status.</li></ul> <p>From the monthly CJT record:</p> <ul style="list-style-type: none"><li>• Opening balance.</li><li>• Deposits.</li><li>• Withdrawals.</li><li>• Wagered amounts.</li><li>• Reimbursement of wagered amounts.</li><li>• Prizes.</li><li>• Closing balance.</li><li>• Prizes in kind.</li><li>• Other transactions.</li></ul> <p>This test requires access by the certification body to unencrypted real data. The operator must provide the certification body with unencrypted monthly RUT and CJT files. The certification body must confirm whether the files correspond to the files actually stored on the operator's information system.</p> <p>The certification body is not required to know the encryption key under any circumstances.</p>				
Expected result	<p>For the monthly RUT:</p> <ul style="list-style-type: none"><li>• The data of the RUT file will be compared with the lists obtained from the back-office application of the technical gambling system.</li></ul> <p>The certification body must be certain of the accuracy of these lists since they are the source against which the completeness of the SCI's real data is compared.</p> <p>For the monthly CJT:</p> <ul style="list-style-type: none"><li>• The data of the CJT file will be compared with the lists obtained from the back-office application of the technical gambling system.</li></ul> <p>The certification body must be certain of the accuracy of these lists since they are the source against which the completeness of the SCI's real data is compared.</p> <ul style="list-style-type: none"><li>• The opening balance of one month will be confirmed to be equal to the closing balance of the previous month.</li><li>• The closing balance will be confirmed to equal the sum of the opening balance and the total of all transactions for that month.</li></ul> <p>As a result of this test, the certification body must include:</p> <ul style="list-style-type: none"><li>• The conformity of the checks made and substantiation for those checks.</li></ul> <p>NOTE: The checks and calculations will be done separately, both in the Euro currency and in any other units, whether bonus points or others.</p>				
Test type	Real data				
Date/time of test performance	<table><tr><th>Game Name</th><th>Date/Time</th></tr><tr><td>Fluffy Favourites 10</td><td>Not applicable (operator's responsibility)</td></tr></table>	Game Name	Date/Time	Fluffy Favourites 10	Not applicable (operator's responsibility)
Game Name	Date/Time				
Fluffy Favourites 10	Not applicable (operator's responsibility)				

**Verification report: ITL2401160**

Obtained result	<table border="1"> <thead> <tr> <th>Game Name</th><th>Results</th></tr> </thead> <tbody> <tr> <td>Fluffy Favourites 10</td><td>Not applicable (operator's responsibility)</td></tr> </tbody> </table>	Game Name	Results	Fluffy Favourites 10	Not applicable (operator's responsibility)
Game Name	Results				
Fluffy Favourites 10	Not applicable (operator's responsibility)				
Qualification	Not applicable (operator's responsibility)				
Observations	Not applicable (operator's responsibility)				

Area	Internal Control System				
Test reference	A.5.2				
Test name	Valid certificate				
Test description	This test will verify what digital certificate is used for signing data. It will also confirm that the certificate is valid and has not been revoked. The certification body is not required to know the encryption key under any circumstances.				
Expected result	The certification body will confirm what digital certificate is used for signing data. It will also confirm that the certificate is valid and has not been revoked.  In the result, the certification body will note the public key of the certificate used for signing the data of the storage system.				
Test type	Real data				
Date/time of test performance	<table border="1"> <thead> <tr> <th>Game Name</th><th>Date/Time</th></tr> </thead> <tbody> <tr> <td>Fluffy Favourites 10</td><td>Not applicable (operator's responsibility)</td></tr> </tbody> </table>	Game Name	Date/Time	Fluffy Favourites 10	Not applicable (operator's responsibility)
Game Name	Date/Time				
Fluffy Favourites 10	Not applicable (operator's responsibility)				
Obtained result	<table border="1"> <thead> <tr> <th>Game Name</th><th>Results</th></tr> </thead> <tbody> <tr> <td>Fluffy Favourites 10</td><td>Not applicable (operator's responsibility)</td></tr> </tbody> </table>	Game Name	Results	Fluffy Favourites 10	Not applicable (operator's responsibility)
Game Name	Results				
Fluffy Favourites 10	Not applicable (operator's responsibility)				
Qualification	Not applicable (operator's responsibility)				
Observations	Not applicable (operator's responsibility)				

**7. Description of certification team, dates and place.**

Certification entity	iTech Labs Italia REA RM-1282510 Dirección: Piazza Guglielmo Marconi n., 15 - 00144 Roma, Italy URL: <a href="http://www.itechlabs.it">www.itechlabs.it</a> Email: <a href="mailto:info@itechlabs.it">info@itechlabs.it</a>
Resources involved in the certification process	Alvin Rizaldi Rogelio Pérez Cano (DNI 45430254X) Nani Srinivasan Eric Sheng Saje Thatparanantham
Date of certification	20 May 2024

**8. Description of the test environments differing from those used by the operator in carrying out the gambling activity**

Eyecon Alderney Limited is a software provider.
---



## Verification report: ITL2401160

All games in this certification have been tested for requirements applicable to software providers. Testing was conducted on the test environment.  
All requirements marked as "operator's responsibility" must be satisfied by the operator before the game can be released to production.

### 9. Description of the digital supporting documentation accompanying the certification report.

Type	Location
Certification Report	General License\ ITL2401160_EN_Functionality_Report_General_License_20May2024.pdf
Technical Requirements	General License\Technical Requirements\Área Cuenta de juego, cobros y pagos General License\Technical Requirements\Área Terminales y sesión de usuario
Evidence of the Integration Tests	Not applicable (operator's responsibility)
Binaries	General License\Binaries

### Certification Signature:

Authorised by:

**Eric Sheng**  
Project Manager

Signed By:

**Alvin Rizaldi**  
Chief Executive Officer

Signed By:

**Rogelio Pérez Cano (DNI 45430254X)**  
Senior Consultant



Verification report: ITL2401160

## Appendix A

### List of critical components and SHA-1

#### Fluffy Favourites 10 93 DH & MH

Game Name	File Name	SHA-1
Fluffy Favourites 10	<a href="#">carbine-game-engine-5.13.2.jar</a>	<a href="#">67bddee48b9cad335df64cc9aa39c99b41156e92</a>
	EvaluationChain.class	b4f9f9f5e781252959760a8b7f6a933de6b7a114
	ReelSymbolExpander.class	eed9eef1fb90819b55f1101de7eb697b29d21ad2
	CountSymbolEvaluator.class	b3f4c7c1876ebd2e559a3b835c67daefe6cb1813
	LinesWinMultiPatterEvaluator.class	c8656fa313131290613b39b1f462a1f6cfcc3a83
	PatternMatchingEvaluator.class	8148f0bbe65bee5c94bbaad5c78c615ba063cf3c
	PrizeLinePatternMatchingEvaluator.class	251e569cd2a62e1509c5b18178d1361b95550cc3
	RebetsLineWinPatternMatchingEvaluator.class	934fcd6b3b4131aa1d0db5de03ef1eeeb2df98f4
	DisplayGenerator.class	3ac44fb96b389b33111f9a95f9c109888e0917e2
	RebetDetailBuilder.class	435bf790a162a09d65f8ced534416ff1858ecca6
	RebetEvaluator.class	273f16d662ee5319da7fc429fe17c1265d61590e
	ReelStripGenerator.class	27ae3e490f8a3bd95beb6bbf472fe782bca7d423
	ResetRebetEvaluator.class	772b2a40d8dd8dceaf62400a52fb7c6361cb7102
	PrizeLineTriggerEvaluator.class	d784c071c81de47e515724522f5efa42c1d26600
	TriggerRandomMultiplierEvaluator.class	9b26ed27f471de80f8b371ad5d82de0aad0c676
	CarbineGame.class	95c02d5d57b02da7ec9080208dd32f286d894e3b
	CarbineGameComponent.class	f2d68012443ab92bdf874690734b29309a8cb7b
	GameWinsCalculatorImpl.class	921e30a61c8e7a1b655b08dd6740bf8073ffdc1
	PrizeMultiplier.class	bd6f19cb863832b39ed3b419f985237b0fb5b904
	RetriggerCount.class	0ad82a0a3d20818fd921279d265730760a5b844c
	EyeconSpinGameRules.class	cf7f196182d81541953cdbbe78a9887cec0cad9b
	Multiplier.class	8d2f1b1db2aca512031c1e81d19fcebe795410e8
	RngSequences.class	02c6c43745e2e146a99ca75a0b3e258dd44c5495
	SlotGameVariableConfigurationImpl.class	da158601773b9eab4ca70746c714e705c4cee01c
	SymbolHoldSpinGame.class	e5faeebb3fa0e3d571c54a56750f7aeab50b49da
	SymbolHoldSpinRuleImpl.class	4f223ffacdc2468ed31cc1572b6476792350331e
	SymbolHoldSpinScreenEvaluator.class	aac195e2abdd33e5d237ec71ed41a046ce2cfd2
	SymbolHoldTriggerEvaluator.class	e9898a28a6426c0e885f9b00ce0e30c9e9634a3f
	SymbolSwapSpinShapeEvaluator.class	6aad79ec0c347e75094c002c9485699e3fd3639b
	SymbolSwapSpinTriggerEvaluator.class	f3d97647f90aa2829eefc9816844315c3c8e2c31
	<a href="#">carbine-slots_fluffyFavourites10_93_standard-1.0.3-config.jar</a>	<a href="#">b0a7277577ea3003007f839f88116907b62a1eaa</a>
	carbine-slots_fluffyFavourites10_93_standard-1.0.3.json	5327a07dd2f96678c0408c5dae618144f1dce37d



## Verification report: ITL2401160

### Fluffy Favourites 10 95 DH & MH

Game Name	File Name	SHA-1
Fluffy Favourites 10	<a href="#">carbine-game-engine-5.13.2.jar</a>	<a href="#">67bddee48b9cad335df64cc9aa39c99b41156e92</a>
	EvaluationChain.class	b4f9f9f5e781252959760a8b7f6a933de6b7a114
	ReelSymbolExpander.class	eed9eef1fb90819b55f1101de7eb697b29d21ad2
	CountSymbolEvaluator.class	b3f4c7c1876ebd2e559a3b835c67daefe6cb1813
	LinesWinMultiPatterEvaluator.class	c8656fa313131290613b39b1f462a1f6cfc3a83
	PatternMatchingEvaluator.class	8148f0bbe65bee5c94bbaad5c78c615ba063cf3c
	PrizeLinePatternMatchingEvaluator.class	251e569cd2a62e1509c5b18178d1361b95550cc3
	RebetsLineWinPatternMatchingEvaluator.class	934fcd6b3b4131aa1d0db5de03ef1eeeb2df98f4
	DisplayGenerator.class	3ac44fb96b389b33111f9a95f9c109888e0917e2
	RebetDetailBuilder.class	435bf790a162a09d65f8ced534416ff1858ecca6
	RebetEvaluator.class	273f16d662ee5319da7fc429fe17c1265d61590e
	ReelStripGenerator.class	27ae3e490f8a3bd95beb6bbf472fe782bca7d423
	ResetRebetEvaluator.class	772b2a40d8dd8dceaf62400a52fb7c6361cb7102
	PrizeLineTriggerEvaluator.class	d784c071c81de47e515724522f5efa42c1d26600
	TriggerRandomMultiplierEvaluator.class	9b26ed27f471de80f8b371ad5d82de0aad0c676
	CarbineGame.class	95c02d5d57b02da7ec9080208dd32f286d894e3b
	CarbineGameComponent.class	f2d68012443ab92bdf874690734b29309a8cb7b
	GameWinsCalculatorImpl.class	921e30a61c8e7a1b655b08dd6740bf8073ffdc1
	PrizeMultiplier.class	bd6f19cb863832b39ed3b419f985237b0fb5b904
	RetriggerCount.class	0ad82a0a3d20818fd921279d265730760a5b844c
	EyeconSpinGameRules.class	cf7f196182d81541953cbbbe78a9887cec0cad9b
	Multiplier.class	8d2f1b1db2aca512031c1e81d19f9cebe795410e8
	RngSequences.class	02c6c43745e2e146a99ca75a0b3e258dd44c5495
	SlotGameVariableConfigurationImpl.class	da158601773b9eab4ca70746c714e705c4cee01c
	SymbolHoldSpinGame.class	e5faeebb3fa0e3d571c54a56750f7aeab50b49da
	SymbolHoldSpinRuleImpl.class	4f223ffacdc2468ed31cc1572b6476792350331e
	SymbolHoldSpinScreenEvaluator.class	aac195e2abdd33e5d237ec71ed41a046ce2cfd2
	SymbolHoldTriggerEvaluator.class	e9898a28a6426c0e885f9b00ce0e30c9e9634a3f
	SymbolSwapSpinShapeEvaluator.class	6aad79ec0c347e75094c002c9485699e3fd3639b
	SymbolSwapSpinTriggerEvaluator.class	f3d97647f90aa2829eefc9816844315c3c8e2c31
	<a href="#">carbine-slots_fluffyFavourites10_95_standard-1.0.3-config.jar</a>	<a href="#">62a20784ab53d6c291e16f1c32c26c843d2d95ec</a>
	carbine-slots_fluffyFavourites10_95_standard-1.0.3.json	e15de9094d0b607edb7c57699762ab165083b15f





## Verification report: ITL2401160

### Fluffy Favourites 10 90 JP DH & MH

Game Name	File Name	SHA-1
Fluffy Favourites 10	<a href="#">carbine-game-engine-5.13.2.jar</a>	<a href="#">67bddee48b9cad335df64cc9aa39c99b41156e92</a>
	EvaluationChain.class	b4f9f9f5e781252959760a8b7f6a933de6b7a114
	ReelSymbolExpander.class	eed9eef1fb90819b55f1101de7eb697b29d21ad2
	CountSymbolEvaluator.class	b3f4c7c1876ebd2e559a3b835c67daefe6cb1813
	LinesWinMultiPatterEvaluator.class	c8656fa313131290613b39b1f462a1f6cfcc3a83
	PatternMatchingEvaluator.class	8148f0bbe65bee5c94bbaad5c78c615ba063cf3c
	PrizeLinePatternMatchingEvaluator.class	251e569cd2a62e1509c5b18178d1361b95550cc3
	RebetsLineWinPatternMatchingEvaluator.class	934fcd6b3b4131aa1d0db5de03ef1eeeb2df98f4
	DisplayGenerator.class	3ac44fb96b389b33111f9a95f9c109888e0917e2
	RebetDetailBuilder.class	435bf790a162a09d65f8ced534416ff1858ecca6
	RebetEvaluator.class	273f16d662ee5319da7fc429fe17c1265d61590e
	ReelStripGenerator.class	27ae3e490f8a3bd95beb6bbf472fe782bca7d423
	ResetRebetEvaluator.class	772b2a40d8dd8dceaf62400a52fb7c6361cb7102
	PrizeLineTriggerEvaluator.class	d784c071c81de47e515724522f5efa42c1d26600
	TriggerRandomMultiplierEvaluator.class	9b26ed27f471de80f8b371ad5d82de0aad0c0c676
	CarbineGame.class	95c02d5d57b02da7ec9080208dd32f286d894e3b
	CarbineGameComponent.class	f2d68012443ab92bdf874690734b29309a8cb7b
	GameWinsCalculatorImpl.class	921e30a61c8e7a1b655b08dd6740bf8073ffdc1
	PrizeMultiplier.class	bd6f19cb863832b39ed3b419f985237b0fb5b904
	RetriggerCount.class	0ad82a0a3d20818fd921279d265730760a5b844c
	EyeconSpinGameRules.class	cf7f196182d81541953cbbbe78a9887cec0cad9b
	Multiplier.class	8d2f1b1db2aca512031c1e81d19fcebe795410e8
	RngSequences.class	02c6c43745e2e146a99ca75a0b3e258dd44c5495
	SlotGameVariableConfigurationImpl.class	da158601773b9eab4ca70746c714e705c4cee01c
	SymbolHoldSpinGame.class	e5faeebb3fa0e3d571c54a56750f7aeab50b49da
	SymbolHoldSpinRuleImpl.class	4f223ffacdc2468ed31cc1572b6476792350331e
	SymbolHoldSpinScreenEvaluator.class	aac195e2abdd33e5d237ec71ed41a046ce2cfd2
	SymbolHoldTriggerEvaluator.class	e9898a28a6426c0e885f9b00ce0e30c9e9634a3f
	SymbolSwapSpinShapeEvaluator.class	6aad79ec0c347e75094c002c9485699e3fd3639b
	SymbolSwapSpinTriggerEvaluator.class	f3d97647f90aa2829eefc9816844315c3c8e2c31
	<a href="#">carbine-slots_fluffyFavourites10_90_jackpot-1.0.3-config.jar</a>	<a href="#">751d209828c277b6d206848edac016aa16058d6c</a>
	carbine-slots_fluffyFavourites10_90_jackpot-1.0.3.json	16d9ed3f398e587f1aa4cd2c4fd26a16a972b65b
	<a href="#">pool-server-service-1.5.0.jar</a>	<a href="#">5f84adf4d521f551f1dc5063de03608cfffde86a</a>
	MysteryPoolImpl.class	150d5300a805e32d2f3e534b8f082eb37e45d901
	ProbabilityPoolImpl.class	1a0376e7a885ef3ddc2b381362f70cd35b24f03c