



Verification report: ITL2500030

Eyecon Alderney Limited

**Functionality Report
General License**

03 February 2025

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1. Identification of the certification

Type of certification report	Final Certification Report of Functionality – General License
Identification code of the report	ITL2500030
Details identifying the certification body	iTech Labs Italia REA RM-1282510 Dirección: Piazza Guglielmo Marconi n., 15 - 00144 Roma, Italy URL: www.itechlabs.it Email: info@itechlabs.it
Details identifying the report's signatory on behalf of the certification body	Alvin Rizaldi Eric Sheng Rogelio Pérez Cano (DNI 45430254X)
Dates on which the certification work was performed	From 14 November 2024 to 03 February 2025
Publication date of the certification report	03 February 2025

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 rowspan="2">Whack-a-Fluffy</td><td>HTML5 Desktop</td></tr> <tr> <td>HTML5 Mobile</td></tr> </tbody> </table>	Game Name	Channel	Whack-a-Fluffy	HTML5 Desktop	HTML5 Mobile
Game Name	Channel					
Whack-a-Fluffy	HTML5 Desktop					
	HTML5 Mobile					
Licensee	Not applicable					
Manufacturer	Eyecon Alderney Limited Millennium House Olliver Street Alderney GY9 3TD Contact: Helen Ackrill (helen.ackrill@ackrill.gg)					
Product name	<table border="1"> <thead> <tr> <th>Game Name</th><th>Channel</th></tr> </thead> <tbody> <tr> <td rowspan="2">Whack-a-Fluffy</td><td>HTML5 Desktop</td></tr> <tr> <td>HTML5 Mobile</td></tr> </tbody> </table>	Game Name	Channel	Whack-a-Fluffy	HTML5 Desktop	HTML5 Mobile
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Whack-a-Fluffy	HTML5 Desktop					
	HTML5 Mobile					
Product Version	<table border="1"> <thead> <tr> <th>Game Name</th><th>Version</th></tr> </thead> <tbody> <tr> <td>Whack-a-Fluffy</td><td>1.0.8</td></tr> </tbody> </table>	Game Name	Version	Whack-a-Fluffy	1.0.8	
Game Name	Version					
Whack-a-Fluffy	1.0.8					
In all cases the data capturer and storage regarding the components must be recorded	Not applicable					
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 This certification is for games only					
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: Continent 8 Technologies					

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	<p>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"> • Desktop • iPhone XS Max • Samsung Galaxy S20 • iPad Mini 4 • Samsung Galaxy Tab 4

3. Executive summary of the functionality certification

3.1 Overall classification of functionality

Overall classification of functionality	Comply*
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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

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3.3 Summary table of the specific analysis

Various specific analysis performed	Not applicable This certification is for games only
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3.3.1 Verification analysis for identity and bans

Classification	Not applicable This certification is for games only
I. General Information	
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
Verification Before Activating Player Accounts	
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
Verification Before Granting Rewards	
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
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3.4 Summary table of the integration tests

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



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Certification Signature:

Authorised by:

A handwritten signature in black ink, reading "Eric Sheng", written over a horizontal line.

Eric Sheng

Project Manager

Signed By:

A handwritten signature in black ink, reading "Alvin Rizaldi", written over a horizontal line.

Alvin Rizaldi

Chief Executive Officer

Signed By:

A handwritten signature in blue ink, reading "Rogelio Pérez Cano", written over a horizontal line.

Rogelio Pérez Cano (DNI 45430254X)
Senior Consultant

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4. Compliance details on the technical requirements

Area and Reference to the requirement	Classification	Observations
1. Juego Responsable		
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
2. Contrato. Aceptación, copia y modificaciones		
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
3. Registro de usuario y comprobación de las prohibiciones		
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
4. Cuenta de juego, cobros y pagos		
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 I. 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	Not Applicable	This certification is for games only

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RES_TEC Anexo I. 2.2.5 Prohibición de transferencias entre participantes	Not Applicable	This certification is for games only
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
5. Límites a los depósitos		
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
6. Registro y trazabilidad		
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
7. Terminales y sesión de usuario		
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
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	This certification is for games only
RES_TEC Anexo I. 3.7.3.4 Terminales móviles	Not Applicable	This certification is for games only
RES_TEC Anexo I. 3.8.1 Desconexión por inactividad	Not Applicable	This certification is for games only
RES_TEC Anexo I. 3.8.2 Registro de las sesiones de usuario	Not Applicable	This certification is for games only
8. Canales de comunicación		
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 comunicaciones por voz	Not Applicable	This requirement is not applicable 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
9. Aplicaciones de juego gratuito		
RD_LIC Disposición adicional sexta. Aplicaciones de juego gratuito	Not Applicable	This certification is for games only
10. Sistema de control interno		
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

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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

General Information	
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
Verification Before Activating Player Accounts	
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
Verifications before granting a reward	
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
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6. Details of Integration Tests

Area	User registration and exclusion checks
Test reference	A.1.1
Test name	Addition of user registration
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.

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	<p>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.</p> <p>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.</p>
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	<p>From the participant's point of view, registration will proceed in the case of:</p> <ul style="list-style-type: none"> - 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	<p>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.</p> <p>FUNCTIONAL The system must not allow the registration of minors, persons appearing in the RGIAJ or those whose verification details are incorrect.</p> <p>TRACEABILITY The system's records and traces which collect the user registration details will be analysed.</p>
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
Test name	Validation of the DNI/NIE field
Test description	<p>This test will verify that the internal control system uses mechanisms to avoid the following scenarios:</p> <ul style="list-style-type: none"> - The introduction of wrong values into the DNI or NIE, such as, format errors, or letters not matching the number. - The activation of a user registration despite errors in the DNI or NIE. - Confusion of the NIE field for that of the DNI and vice versa.
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

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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	Gambling account, amounts paid and collected
Test reference	A.2.1
Test name	Correct recording of transactions on the gambling account.
Test description	<p>From the participant's point of view, deposits and withdrawals will be made on the gambling account.</p> <p>The possibility of performing other operations on the gambling account will be analysed.</p>
Expected result	<p>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</p> <p>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.</p> <p>TRACEABILITY The system's records and traces which collect the deposit and withdrawal details will be analysed.</p>
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.3.1
Test name	Depositing in excess of limits
Test description	<p>The system will be accessed with an account that has a default daily, weekly or monthly deposit limit.</p> <p>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.</p> <p>Each limit, whether daily, weekly or monthly, must be tested by using various time-frame combinations.</p>
Expected result	<p>FUNCTIONAL The system allows limits to be reduced. The system allows deposits under the limit but does not allow deposits over the limit.</p> <p>TRACEABILITY The system's records and traces which show the changes to limits will be analysed.</p>
Test type	FUNCTIONAL, TRACEABILITY
Date/time of test performance	Not applicable (operator's responsibility)
Obtained result	Not applicable (operator's responsibility)

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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	<p>The system's real data will be checked to ascertain how many participants have limits greater than the predetermined limits.</p> <p>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.</p>
Expected result	<p>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.</p> <p>The system will be checked to ensure it keeps the records and traces of the applications, analyses and authorisations for the limit increases.</p>
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	<p>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.</p> <p>The certification body will access each website from a Spanish IP address and verify the redirection.</p>
Expected result	<p>The redirection to the ".es" domain will be confirmed.</p> <p>The certification body will list the websites without the ".es" domain that were accessed in this test.</p>
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	<p>This test will compare the data in the SCI with the data held in the operator's 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"> • Number of registrations. • Number of participants according to status. <p>From the monthly CJT record:</p>

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	<ul style="list-style-type: none"> • Opening balance. • Deposits. • Withdrawals. • Wagered amounts. • Reimbursement of wagered amounts. • Prizes. • Closing balance. • Prizes in kind. • Other transactions. <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"> • The data of the RUT file will be compared with the lists obtained from the back-office application of the technical gambling system. 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>For the monthly CJT:</p> <ul style="list-style-type: none"> • The data of the CJT file will be compared with the lists obtained from the back-office application of the technical gambling system. 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. • The opening balance of one month will be confirmed to be equal to the closing balance of the previous month. • The closing balance will be confirmed to equal the sum of the opening balance and the total of all transactions for that month. <p>As a result of this test, the certification body must include:</p> <ul style="list-style-type: none"> • The conformity of the checks made and substantiation for those checks. <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 border="1"> <thead> <tr> <th>Game Name</th><th>Date/Time</th></tr> </thead> <tbody> <tr> <td>Whack-a-Fluffy</td><td>Not applicable (operator's responsibility)</td></tr> </tbody> </table>	Game Name	Date/Time	Whack-a-Fluffy	Not applicable (operator's responsibility)
Game Name	Date/Time				
Whack-a-Fluffy	Not applicable (operator's responsibility)				
Obtained result	<table border="1"> <thead> <tr> <th>Game Name</th><th>Results</th></tr> </thead> <tbody> <tr> <td>Whack-a-Fluffy</td><td>Not applicable (operator's responsibility)</td></tr> </tbody> </table>	Game Name	Results	Whack-a-Fluffy	Not applicable (operator's responsibility)
Game Name	Results				
Whack-a-Fluffy	Not applicable (operator's responsibility)				



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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><tr><th>Game Name</th><th>Date/Time</th></tr><tr><td>Whack-a-Fluffy</td><td>Not applicable (operator's responsibility)</td></tr></table>	Game Name	Date/Time	Whack-a-Fluffy	Not applicable (operator's responsibility)
Game Name	Date/Time				
Whack-a-Fluffy	Not applicable (operator's responsibility)				
Obtained result	<table><tr><th>Game Name</th><th>Results</th></tr><tr><td>Whack-a-Fluffy</td><td>Not applicable (operator's responsibility)</td></tr></table>	Game Name	Results	Whack-a-Fluffy	Not applicable (operator's responsibility)
Game Name	Results				
Whack-a-Fluffy	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: www.itechlabs.it Email: info@itechlabs.it
Resources involved in the certification process	Alvin Rizaldi Rogelio Pérez Cano (DNI 45430254X) Nani Srinivasan Eric Sheng Khushboo Agrawal Santhosh Kumar Pavithra Kumar
Date of certification	03 February 2025

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

Type	Location
Certification Report	General License\ ITL2500030_EN_Whack-a-Fluffy_ES_Eyecon_General_Licence_03Feb25.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



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Appendix A

List of critical components and SHA-1

Whack-a-Fluffy 93 WEB

Game Name	File Name	SHA-1
Whack-a-Fluffy	carbine-game-engine-5.16.1.jar	c22ec0a25565d517d2f9d9094e78988885073dd5
	EvaluationChain.class	bc534352cc4bdb9c12ffbe493b67abf308ceed18
	ReelSymbolExpander.class	64c3a772af93fa2ae20994f2d4a338dcfa3356a2
	CountSymbolEvaluator.class	576c91be9189657f4dcd79a6dd24d666d7e8a4a5
	PatternMatchingEvaluator.class	7d99bc50bf94187b55ceafc36839aa3db80b05c5
	PrizeLinePatternMatchingEvaluator.class	d9eae0138b55b40dc780e6dd63ef8fda37b75fe3
	RebetsLineWinPatternMatchingEvaluator.class	437967e660c176f9abac02e1d3df5c51210facf8
	DisplayGenerator.class	5969cdec1412e8bbe902f3e9b521502e17c092ba
	RebetDetailBuilder.class	98dab1c87bedcaadb9fbd78e616f00b304d276f
	RebetEvaluator.class	a2fecf4bd265e72ef1680251ff7e02608cba16c1
	ReelStripGenerator.class	2e1f466a65da9cba3d2d4d85639cff560214ae70
	ResetRebetEvaluator.class	c15af27d44ff3c62834438ab1f6615eaa36593d6
	PrizeLineTriggerEvaluator.class	459fce9e3be01f4f5a53bbb8813bd706274f2390
	TriggerRandomMultiplierEvaluator.class	49c866693bb63fd8d9a0459ae248ec5352261f92
	CarbineGame.class	da33d123332de7a3da26909f5c8d04cbeeb6086e
	CarbineGameComponent.class	cdeaf4f09bb87fbc8e9b3411edce29714d04540
	GameWinsCalculatorImpl.class	5dbc93c0e3838a7c4dc2ad281d3ad1d68bbfd8ff
	PrizeMultiplier.class	37c3eb7470125014d97a8be6a9d942e46846516d
	RetriggerCount.class	52f246c12ba73d4bb0998167556c2a6c46d40bce
	EyeconSpinGameRules.class	e45fa9f06d7598168b34effae0a6c188bdbbca3d
	Multiplier.class	acc995bf8cfc1278c0770c47cdd17c56ac389ed8
	RngSequences.class	ead214c3dd4974c3c5b9b6a975eca7323d9524e4
	SlotGameVariableConfigurationImpl.class	73b7baf38e3904cf4464b3adf43b85486f439369
	SymbolHoldSpinGame.class	48cb554dd73ca2a3d3f025f5220f8b36caec9335
	SymbolHoldSpinRuleImpl.class	6305bb4b5905fd0335c32a0717e865cd54325ea7
	SymbolHoldSpinScreenEvaluator.class	8a65fb7b419fea0473a1a8b19eef4a9ef7128c56
	SymbolHoldTriggerEvaluator.class	e2591bd905978126a984a943abb710f15c5e51fc
	SymbolSwapSpinShapeEvaluator.class	2f101cb1d95b84e4ab7fc87d38988ed2fd0022bc
	SymbolSwapSpinTriggerEvaluator.class	b874f1c346cef235fcb49e7d8d1e877a118bd104
	carbine-slots_whackaFluffy_93_standard-1.0.0-config.jar	062b28c135b6722f816ab52161d7480405ef3428
	carbine-slots_whackaFluffy_93_standard-1.0.0.json	4bf65cd277daf796aec51ecf05ecd542ce7d6683