



The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



General requirements – SCP.00.00.DK.3.0

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# Introduction

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The Danish Gambling Authority's certification programme for betting and online casinos aims to ensure that the gambling system conducts gambling in a correct manner and that the security of the gambling offer is maintained. Licence holders and game suppliers shall at all times be certified in accordance with the parts of the certification programme relevant to their licence.

The certification programme consists of a number of documents that are continuously adapted to current legislation and technological developments. The requirements of the certification programme are adapted to the different game categories. Each document sets out minimum requirements for the organisation of the licence holder's and game supplier's platforms, business processes and business systems.

The certification programme for betting and online casino covers the following game categories:

- Online betting
- Land-based betting
- Online casinos

On the Danish Gambling Authority's website, there is also a certification programme for land-based casinos and lotteries.

## 1.1 Definitions

### **Actors:**

Licence holder

- Person or company, etc. (legal person) licensed to provide betting, cf. § 11 of the Gambling Act, or licensed to provide online casinos, cf. § 18 of the Gambling Act.

Game supplier:

- Company authorised under § 24 a of the Gambling Act to provide games to a licence holder for the provision of betting, cf. § 11 of the Gambling Act, or for the provision of online casinos, cf. § 18 of the Gambling Act.

Testing company:

- A company that conducts tests and inspections. Also includes enterprises performing penetration tests or vulnerability scans.

### **Concepts:**

Test:

- Accredited testing by a laboratory accredited to ISO/IEC 17025 or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme for betting and online casinos.

Inspection:

- Accredited inspection by an inspection body accredited as type A body according to ISO/IEC 17020 for inspection or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme for betting and online casinos.

Base platform:

- System used for managing game accounts including account creation and login, customer self-restriction functions and handling of players' funds including system that:
  - Is used for storing information relating to customers and customer participation in games, including historical data and result information.

Gambling platform:

- Games and systems or other equipment used for the provision and settlement of games, including systems and equipment that:

- produce and/or present games to the player;
- determines and stores the outcome of a game, or calculates whether the player has won or lost a game.

Game system:

- Base platform and game platform combined.

Game certificate:

- Standard report prepared as documentation for testing and inspection according to SCP.07.01-03 requirements for games. The standard report can cover one or more games.

Business system

- Electronic system or other equipment used by the licence holder or game supplier to support the supply or provision of gambling, without however being defined as part of the gambling system.

Business procedures:

- The licence holder's or game supplier's described procedures for dealing with the game system, the business system and the data the systems may contain. This can be described using formal management systems such as ISO/IEC 27001.

Gambling technology equipment:

- Physical equipment used for settlement and presentation of games, including roulette wheels, card mixers, card shoes, etc.

Sensitive information:

- Information that is either of a business or personal sensitive nature.

Log:

- Automatic recording of data that cannot be manipulated after it has been recorded. If data needs to be changed, this must be done by creating a new record instead of correcting or deleting the existing record.

Report:

- Data extraction of records from one or more logs.

User interface:

- All forms of remote communication through which the customer can interact with the gambling system, e.g. home page or app.

## 1.2 Legal basis for the certification programme

The certification programme was issued by the Danish Gambling Authority pursuant to § 41 of Consolidated Act No 1303 of September 2020 on gambling, as amended, § 30 of Consolidated Act No 1276 of 29 November 2019 on online betting, § 35 of Consolidated Act No 1274 of 29 November 2019 on online casinos and § 31 of Consolidated Act No 1140 of 28 August 2023 on land-based betting.

## 1.3 Version

Version 1 of 2014.07.04

- New structure compared to the previous version 1.3, as well as a number of updates in a number of areas. Therefore, a new version

1.0 is issued. The intention in the future is to follow normal version numbering.

Version 1.1 of 2015.12.21

- Corrections made in relation to the implementation of requirements for lotteries in the certification programme.

#### Version 1.2 of 2018.01.01

- Changes made in the context of the liberalisation of online bingo, horse and dog racing and racing of racing pigeons, as well as the implementation of requirements for land-based casinos in the certification programme

#### Version 1.3 of 2020.01.01

- Updated version 1.3 due to new announcements. Added definition of user interface.

#### Version 2.0 of 2023.01.01

- Updated definition of 'technical gambling equipment'. Implemented information from Information #43, including list of games and supervision. Added section on certification when applying for a licence. Updated section on the use of risk assessment. In addition, several redraftings.

#### Version 2.1 of 2023.10.01

- Updated visual layout of the document. A few linguistic corrections. No changes to requirements.

#### Version 3.0 of 2025.01.01

- Update on the basis of the introduction of supplier licences, which has led to several linguistic changes in the document and a split of the certification programme, as the supplier licence is only introduced for betting and online casinos.
- The certification programme for betting and online casinos no longer follows the structure of the certification programme for lotteries and land-based casinos.
- The following new definitions have been added: Licence holder, game supplier, testing company, base platform, game platform and game certificate. The definition of 'testing' has been renamed 'test' and the definitions of 'inspection' and 'playing system' have been reformulated.
- Sections have been added to the new document SCP.07 requirements for games.
- A section has been added on the game supplier's first certification in connection with the licence application.
- The section on supervision has been updated.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

Upon the release of a new version of the certification programme, the Danish Gambling Authority will, if necessary, publish guidelines on a transitional scheme and the validity of already completed certifications.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.4 Document code

Each document in the betting and online casino certification programme has a document code consisting of:



- “SCP” - This indicates that it is the Danish Gambling Authority’s certification programme.
- Two figures - This indicates the type of document. The codes are:
  - "00" General requirements
  - "01" RNG requirements
  - "02" Requirements for base platform
  - "03" Information security management system
  - "04" Penetration test requirements
  - "05" Vulnerability testing requirements
  - "06" Change Management Programme

- "07" Requirements for gambling
- Two numbers - indicating the type of game to which the document refers. The codes are:
  - "00" All game types
  - "01" Online betting
  - "02" Land-based betting
  - "03" Online casinos
- 'DK' or 'EN' - indicates the language version. 'DK' for Danish and 'EN' for English.
- Version number - described above in section 1.3.

The document code 'SCP.02.02.DK.2.0' is thus version 2.0 of the requirements for the base platform for land-based betting in Danish.

Each document in the certification programme for betting and online casino is accompanied by a standard report to be used by the licence holder and the game supplier as documentation for the certification carried out and for reporting to the Danish Gambling Authority. Each standard report contains a document code that follows the same pattern as above.

## 1.5 Contacts

All questions relating to the certification programme for betting and online casino should be asked in writing via the contact form on the Danish Gambling Authority's website. Select the category 'Certification'.

# Certification

2

## 2.1 Testing and inspection framework

A certification is based on testing and inspection of the licence holder's or game supplier's platforms, gambling equipment, business processes and business systems against criteria set out in the certification programme for betting and online casinos.

Testing and inspection of the licence holder's and game supplier's platforms, equipment, business procedures, etc. are carried out by accredited testing and inspection companies. The requirements for testing companies are set out in the individual documents of the certification programme.

It is the responsibility of the licence holder and game supplier to use a testing company that has the required accreditations. Documentation for certifications drawn up and certified by testing companies that do not meet the accreditation requirements will generally be rejected by the Danish Gambling Authority.

The Danish Gambling Authority does not maintain a list of testing companies.

### 2.1.1 Reporting requirements

The results of the tests and inspections carried out must be reported to the Danish Gambling Authority using the standard report for the relevant certification document. The testing company has freedom of choice between the Danish and English versions of the standard report.

The standard reports and annexes must cover the certification work carried out and must, as a rule, be able to stand alone without additional documents. The standard reports will therefore, in most cases, constitute sufficient documentation. If the Danish Gambling Authority wants additional documentation, the licence holder or game supplier will be asked to submit it.

The testing company must ensure that all the requirements of the certification programme have been considered. If a requirement is not relevant to the licence holder's or game supplier's provision of gambling, this must be stated in the standard report and its annex. If the testing company considers that there is a need to provide additional information to that mentioned in the standard report, this should be noted in the annex to the standard report.

The testing company must report the extent to which the licence holder's and game supplier's platforms, gambling equipment, business procedures and business systems comply with the requirements of the relevant certification documents during the test or inspection period. The standard report must be signed by the testing company.

#### 2.1.1.1 Particular requirements regarding SCP.07 game certificates

The standard reports drawn up per 'SCP.07 requirements for gambling' shall be used as gambling certification and constitute documentation that one or more games have been tested and inspected.

A game certificate may include one or more games. If a game certificate includes more than one game, the following applies:

- All games covered by the game certificate must have the same test and inspection date. This is important, as the date from the

certificate must be used when uploading the game certificate to the Danish Gambling Authority's gambling portal.

- The game certificate must be a compilation of testing and inspection of all games covered by the game certificate.
- The attachment to the game certificate must clearly state which games are covered by the game certificate. The annex indicates the name, version and category of the game.
- Game certificates that include several games must be connected to each individual game in the Danish Gambling Authority's game portal. See guidance on supplier licences on the Danish Gambling Authority's website.

### **2.1.2 Certification in connection with an application for a licence to provide betting services and/or online casino**

The first certification for a licence holder takes place when applying for a licence to provide online casino and/or betting services.

The standard reports documenting the certification in accordance with SCP.02-06 are sent to the Danish Gambling Authority together with Appendix B to the application form for use in the processing of the application for a licence.

In addition, the applicant must update the Danish Gambling Authority's gambling portal with information about games for which a licence is sought.

The first certification is approved by the Danish Gambling Authority only when testing and inspection have been carried out without errors and/or deficiencies. This means, for example, that there must be no requirements that have not been approved or requirements that have not been tested or inspected, nor may there be ignored vulnerabilities or other outstanding issues in either vulnerability scanning or penetration testing.

The first certification cannot be based on a risk assessment, cf. section 2.1.4, as in practice this means that a requirement is not met.

Please note that the requirements of this section do not preclude the possibility of transfer of results from previously performed tests and inspections as described in section 2.4.

### **2.1.3 Certification in connection with application as a game supplier**

The first certification for a game supplier takes place in connection with an application for a licence as a game supplier.

The standard reports documenting the certification of SCP.03-06 are sent to the Danish Gambling Authority together with the application for a licence.

The standard reports documenting the certification of SCP.01 requirements for RNG and SCP.07 requirements for gambling must be uploaded to the Danish Gambling Authority's gambling portal in connection with the application.

The first certification is approved by the Danish Gambling Authority only when testing and inspection have been carried out without errors and/or deficiencies. This means, for example, that there must be no requirements that have not been approved or requirements that have not been tested or inspected, nor must there be ignored vulnerabilities or other outstanding issues in either vulnerability scanning or penetration testing.

The first certification cannot be based on a risk assessment, cf. section 2.1.4, as in practice this means that a requirement is not met.

Please note that the requirements of this section do not preclude the possibility of transfer of results from previously performed tests and inspections as described in section 2.4.

#### **2.1.4 Use of risk assessment**

Exceptionally, it can be accepted that the testing company signs the standard report despite not meeting all the requirements as described in the certification programme. In this situation, the test or inspection must be supported by a risk assessment based on the purpose of the Danish Gambling Act and related executive orders. The risk assessment shall be based on ISO/IEC 31010 Risk management - Risk assessment techniques.



The application of risk assessment is a concrete assessment of the individual requirement in connection with the performance of the specific test or inspection. Thus, risk assessment can only exceptionally be applied to a requirement that has NOT passed a test or inspection.

It shall be indicated in the standard report if this approach has been used.

#### **2.1.5 Subcontractor of the testing company**

If the testing company uses a subcontractor to carry out parts of the test or inspection, the testing company must record information about the subcontractor in the standard report and certify that the Danish Gambling Authority's requirements for the test or inspection have been met.

## **2.2 Platform providers of the licence holder**

It is the responsibility of the licence holder that their certification according to documents SCP.02-06 includes both the licence holder itself and any platform providers. This is relevant in a situation where a licence holder's base platform is provided in whole or in part by platform providers.

Particular attention is drawn to the fact that 'platform provider' is not to be understood as game supplier, as defined in section "1.1 Definitions". A game supplier with its own supplier licence may also be a supplier of components for a licence holder's base platform. This would not be in its capacity as a game supplier, but as a platform provider. The licence holder will always be responsible for the certification of the base platform.

The testing company shall ensure that the licence holder's platform suppliers have been subject to testing and inspection during the period from the licence holder's previous testing and inspection to the current testing and inspection. The testing company must therefore review the certification reports of the base platform suppliers to ensure the following:

- The platform provider's certification report is valid and covers the entire period from the last test and inspection by the licence holder to the current test and inspection.
- The platform provider's testing company is accredited in accordance with the requirements of the Danish Gambling Authority's certification programme.

The testing company of the licence holder shall confirm in the standard report that they have reviewed signed certification reports from a testing company with accreditation in accordance with the requirements of the certification programme where requirements relevant to the platform provider are approved.

When testing and inspecting the licence holder's base platform, the licence holder's testing company shall only address those parts of the platform that are not covered by any base platform suppliers' testing and inspection.

In a situation where the licence holder's certification is based in whole or in part on tests and inspections carried out for their platform providers, the standard reports sent to the Danish Gambling Authority must be a compilation of all tests and inspections carried out for both

licence holders and platform providers. For example, if a platform supplier has itself had tests and inspections, cf. SCP.02, carried out on the components that they supply to the licence holder's base platform, the result of this must be reproduced in the licence holder's standard report. A single "approved" in a standard report can thus be a combination of several results.

All certification reports from platform providers underpinning the licence holder's certification shall be identified in the annex to the standard report. The date of performance of the test and inspection shall also be indicated.

*Guideline: From 1 January 2025, the licence holder is not required to compile standard reports from game suppliers. Documentation for testing and inspection of RNG and gambling, cf. SCP.01 and SCP.07, is uploaded in the Danish Gambling Authority's gambling portal, and game suppliers are responsible for reporting documentation for certifications of SCP.03-06 to the Danish Gambling Authority.*

## 2.3 Supervision

Through supervision, it must be ensured that the work is properly carried out. Supervision refers to actions in which a person reviews/checks/verifies the work performed and the results obtained. On the basis of a general consideration of the requirements for segregation of duties, supervision must in principle be carried out by a person other than the person who carried out the work.

If the framework on which the testing company has obtained accreditation or approval e.g. ISO, PCI or CREST contains rules that an employee may supervise their own work, this is also allowed under the Danish Gambling Authority's certification programme for betting and online casinos.

Regardless of whether one supervises one's own or another person's work, there are two individual actions that must not be taken in the same workflow:

1. Carrying out the work (testing, inspection, etc.).
2. Review/check/verification of the work performed (supervision).

## 2.4 Transfer of previously performed tests and inspections

### **2.4.1 Tests and inspections carried out in accordance with the Danish Gambling Authority's certification programme**

When the testing company has tested or inspected a given requirement in the certification programme and this requirement is included in several different parts of the certification programme, it is not necessary to repeat the test or inspection of the requirement. In such cases, reference may instead be made to the test or inspection already carried out.

### **2.4.2 Testing and inspection carried out in accordance with other standards**

Testing and inspection carried out on the basis of similar standards can be used as a basis for certification. These may include tests and inspections from other jurisdictions. It should be stressed that, in such cases, the actual time of the last test or inspection is the basis for determining the frequency of certification. This means, for example,

that if a 6-month-old test or inspection is used as a basis for certification, the certification must be renewed 6 months earlier than usual. Certification cannot be based on other tests and inspections carried out more than 12 months ago.

The above is also possible even if the testing and inspection has been carried out by another testing company.

When the testing company has to decide whether a test or inspection carried out on the basis of similar criteria can be transferred, this must be supported by a risk assessment

based on the purpose of the Danish Gambling Act and related Orders. The risk assessment shall be based on ISO/IEC 31010 Risk management - Risk assessment techniques.

It shall be indicated in the standard report if this approach has been used.

## 2.5 Approval of identical equipment

In order to avoid the same testing of identical equipment by the licence holder or game supplier, the testing company may carry out an approval of identical equipment for the delivery and provision of land-based betting and online live casino. The approval may be used as a basis for the addition of additional equipment which is identical and used in the same way as the equipment already approved.

When the testing company approves equipment for this purpose, all hardware and software components must be reviewed and assessed to be in compliance with the requirements of the certification programme.

The approval is associated with the respective configuration of hardware and software components. Substantial changes shall be subject to re-approval in accordance with the change management programme.

As mentioned in section 2.4, previous tests and inspections may be used as a basis for certification. This also applies to technical game

equipment such as card mixers and card shoes. If, for example, a type approval or similar has been made directly with the manufacturer and this covers the certification program's requirements for the equipment, then further testing and inspection will not be necessary.





The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Requirements for RNG – SCP.01.00.DK.1.0



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# Purpose of RNG requirements

1

The requirements for RNG shall ensure that random functions are indeed random, that procedures are in place in case of failure of the RNG and that the necessary safeguards are in place.

This document contains testing requirements only. It is clear from the individual requirement whether the requirement should be tested. These requirements are marked with: **[TEST]**. See also section 2.2.1 Requirements for testing companies.

## 1.1 Version

Version 1.0 of 2025.01.01

- First version of the document Requirements for RNG, which is based on previous test standards. Unlike the test standards, this document only contains requirements for RNG. Several sections have been updated in relation to game suppliers and game portals. The section on supervision and signing has been updated.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority publishes, if necessary, guidelines for a transitional scheme and the validity of tests already carried out.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

This document applies to the supply of RNG (§ 24a of the Gambling Act) to licence holders. The document also applies if a licence holder has its own RNG and uses it in its own games.

# Frequency and testing companies

# 2

## 2.1 Frequency of certification

Game suppliers and licence holders who have their own RNG are responsible for ensuring that certification takes place at intervals of no more than 12 calendar months in accordance with the requirements of this document.

### 2.1.1 First test of RNG and upload of certificate

Game suppliers or licence holders who have their own RNG must be certified for the first time before the RNG can be used on the Danish market.

As documentation of the initial certification, the standard report for SCP.01.00 shall be used. The standard report constitutes an RNG certificate.

Information about the RNG and the certificate must be uploaded to the Danish Gambling Authority's gambling portal before the RNG can be used on the Danish market. See instructions on uploading on the Danish Gambling Authority's website.

### 2.1.2 Re-testing of RNG and uploading of certificate

Game suppliers or licence holders who have their own RNG must, as a rule, have a new test carried out within 12 months of the last one. The standard report shall state when the latest re-test was performed.

As documentation of the re-certification, the standard report to SCP.01.00 shall be used. The standard report constitutes an RNG certificate.

The RNG certificate must be uploaded to the Danish Gambling Authority's gambling portal and thereby be received by the Danish Gambling Authority no later than one month after the test has been carried out. See instructions on uploading on the Danish Gambling Authority's website.

If it can be documented that no changes have been made to the RNG since the previous test, the testing company can certify the standard report without further testing being necessary. Documentation that there have been no changes can, for example, be a comparison of hash values generated by the testing company or by the use of validation software.

If there have been changes to the RNG since the previous test, a re-test of SCP.01 may be based on sampling and compliance with the requirements of the document 'SCP.06 - Change Management Programme'.

### 2.1.3 Postponement of recertification

Game suppliers and licence holders who have their own RNG may postpone certification for up to one month from the time a new test should have been carried out. The new test must be completed no later than 13 months from the latest test and the standard report must

be received by the Danish Gambling Authority within 13 months from the latest test.

The Danish Gambling Authority must be informed before the certification is postponed.

The deadline for re-certification shall be shortened by the time the previous 12-month deadline has been postponed. For example, if one takes advantage of the maximum one-month delay, the next test must be carried out after 11 months at the latest. The expected time of the next certification shall reflect this and be indicated in the standard report.

## 2.2 Accredited testing companies

In order to ensure that the necessary qualifications are present when the test is carried out, the testing company and its employees must meet the requirements of this section.

### 2.2.1 Requirements for testing companies

Testing of RNG must be carried out as an accredited test by a laboratory that is accredited according to ISO/IEC 17025 or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.01.00.DK.

The accreditation must be carried out by DANAK (the Danish Accreditation Fund) or an equivalent accreditation body which is a signatory of EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition for testing or for laboratories outside EA's territory by an accreditation body, which is a signatory of ILAC's (the International Laboratory Accreditation Co-operation) multilateral agreement on mutual recognition for testing.

Documentation of the testing company's accreditation shall be attached to the certification report. Alternatively, a link to the accreditation in the certification report can be provided.

### 2.2.2 Requirements for personnel performing the test

The test shall be carried out by personnel suitably qualified in accordance with the requirements of section 6 of ISO/IEC 17025 or ISO/IEC 17065. The accredited testing company must therefore recruit and train suitably qualified, competent and experienced personnel.

### 2.2.3 Supervision and signing of the standard report

The performance of tests shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General



Requirements. It is the supervisor's responsibility to sign the standard report and thereby guarantee that the tests have been carried out professionally.

# Random Number Generator (RNG)

3

### 3.1 Requirements for testing the RNG

#### 3.1.1 RNG suitability for result generation in games and other features with element of randomness

1	<b>[TEST]</b> RNG shall be widely recognised as being a cryptographically strong source of random number extraction.
2	<p><b>[TEST]</b> RNG output shall pass one of the following statistical tests:</p> <ul style="list-style-type: none"> <li>• the DIEHARDER test package;</li> <li>• the National Institute of Standards and Technology (NIST) statistical test suite; or</li> <li>• an equivalent test package of at least the same level.</li> </ul> <p>The tests must be carried out on a volume of data that the accredited testing company generates and assesses to be sufficient to ensure statistically valid results.</p>

#### 3.1.2 Procedure for failure of RNG

1	<p><b>[TEST]</b> In case of failure of RNG output, including missing output, the RNG shall be deactivated.</p> <p>Guideline: It is possible to switch to a backup RNG, provided that it complies with the</p>
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#### 3.1.3 Seeding

1	<b>[TEST]</b> The game system shall ensure RNG output by using an appropriate and effective method of seeding and re-seeding.
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Base platform requirements – SCP.02.00.DK.1.0

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# Purpose of base platform requirements

1



Requirements for the base platform must ensure that the base platform has features that support a number of essential considerations in the Gambling Act by, among other things, laying down requirements for the handling of the player's gambling accounts, including requirements for customer registration, the customer identification process, the handling of the player's funds, responsible gambling as well as logging of participation in games and transactions in the gambling account.

This document contains both test and inspection requirements. It is clear from the individual requirement whether the requirement should be tested. These requirements are marked with: **[TEST]**. If this marking is not provided, the requirement shall be inspected. Please note that there are different requirements for accreditation for testing establishments depending on whether the requirement is to be tested or inspected. See section 2.2.1 Requirements for testing establishments.

## 1.1 Version

Version 1.0 of 2025.01.01

- First version of requirements for the base platform, which is based on previous inspection standards. Contrary to inspection standards, this document only contains requirements for gambling accounts and basic platform features. All game-specific requirements have been moved to SCP.07.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority publishes, if necessary, guidelines for a transitional scheme and the validity of tests and inspections already carried out.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

This document applies to the provision of online and land-based betting (§ 11 of the Gambling Act) and the provision of online casinos (§ 18 of the Gambling Act).

For online bingo offered via television, the following requirements of this document do not apply:

- Section 3: 3.1.1.9, 3.2.2.2, 3.2.2.6, 3.2.3, 3.2.4.1, 3.2.4.2, 3.2.6, 3.3.1.1, 3.3.1.2, 3.3.1.3, 3.3.1.4, 3.3.1.5, 3.3.1.10, 3.3.1.11, 3.3.1.12, 3.4, 3.5
- Section 4: 4.1.1.2, 4.1.2.1, 4.1.2.2, 4.1.2.4, 4.1.2.5
- Section 5: 5.1.1, 5.1.2, 5.1.3, 5.1.4.3, 5.1.4.4

# Frequency and testing companies

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## 2.1 Frequency of certification

Licence holders are responsible for ensuring that certification is carried out in accordance with the requirements of this document at intervals of no more than 12 calendar months.

### 2.1.1 First certification

The base platform must be certified for the first time before a licence for gambling can be issued, unless the Danish Gambling Authority has stated otherwise. See section 2.1.2 of the General Requirements for further details.

The SCP.02.00 standard report shall be used as documentation of the initial certification.

### 2.1.2 Re-certification

As a rule, the base platform must be re-certified within 12 months of the latest certification. The standard report shall indicate when tests and inspections have been renewed.

The standard report to SCP.02.00 shall be used as documentation of the re-certification. The report must be received by the Danish Gambling Authority no later than two months after the test and inspection has been carried out.

Renewal of certification may be based on sampling and compliance with the requirements of the document 'SCP.06.00.DK - System Change Management Programme'.

### 2.1.3 Postponement of recertification

Licence holders may defer certification up to two months from the time when a new test and inspection should have been carried out. The new test and inspection must be completed no later than 14 months from the latest test and inspection and the standard report must be received by the Danish Gambling Authority within 14 months from the latest test and inspection.

The Danish Gambling Authority must be informed before the certification is postponed.

The deadline for re-certification shall be shortened by the time the previous 12-month deadline has been postponed. For example, if one takes advantage of the maximum one-month postponement, the next test and inspection must be carried out after 10 months at the latest. The expected time of the next certification shall reflect this and be indicated in the standard report.

## 2.2 Accredited testing companies

In order to ensure that the necessary qualifications are available when tests and inspections are carried out, the testing company and its personnel shall comply with the requirements of this Section.

### 2.2.1 Requirements for testing companies

Testing of the base platform must be carried out as accredited testing by a laboratory that is accredited according to ISO/IEC 17025 or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme for betting and online casinos SCP.02.00.DK. It is evident from the individual requirements,

whether they should be tested. Testing refers to whether the function in question is working as intended. These requirements are marked with: **[TEST]**.

Inspection of the base platform must be carried out as an accredited inspection by an inspection body that is accredited as a type A body according to ISO/IEC 17020 for inspection or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.02.00.DK.

Accreditation must be carried out by DANAK (the Danish Accreditation Fund) or an equivalent accreditation body that is a signatory to EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition for testing and inspection or, for inspection bodies outside EA's territory, by an accreditation body that is a signatory to ILAC's (the International Laboratory Accreditation Cooperation) multilateral agreement on mutual recognition for testing and inspection.

Links to documentation of the testing company's accreditation are stated in the game certificate.

### **2.2.2 Requirements for personnel carrying out tests and inspections**

Testing and inspection shall be carried out by personnel suitably qualified in accordance with the requirements of section 6 of ISO/IEC 17025, section 6 of ISO/IEC 17020 or section 6 of ISO/IEC 17065. The accredited testing company must therefore recruit and train suitably qualified, competent and experienced personnel.

### **2.2.3 Supervision and signing of the standard report**

The performance of tests and inspections shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General Requirements. It is the supervisor's responsibility to sign the standard report and thereby guarantee that the tests and inspections have been carried out professionally.

# Game accounts

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### 3.1 General

#### 3.1.1 Licence holder general rules and conditions

1	The base platform shall require customers, upon registration, to accept the terms and conditions of the licence holder.
2	The base platform shall only allow the customer to play for money once they have accepted the licence holder's terms and conditions. The base platform must record this
3	The licence holder's rules and conditions must state that the customer enters into a contract with the licence holder.
4	The licence holder's rules and conditions must state that a Danish licence to offer gambling is valid only in Denmark (and possibly Greenland).
5	The licence holder's rules and conditions must state that the customer gives consent for the licence holder to obtain information for verification of the customer's identity.
6	The licence holder's rules and conditions must state that persons under the age of 18 years may not participate in the games, that the customer may only act on their own behalf, and how the licence holder's rules are to be enforced.
7	The licence holder's rules and conditions must state how customer complaints will be handled.
8	The licence holder's rules and conditions must state how sensitive personal information is handled.
9	The licence holder's rules and conditions shall specify how funds on gambling accounts that are no longer in use are handled, including funds on: <ul style="list-style-type: none"> <li>• passive gambling accounts;</li> <li>• suspended gambling accounts;</li> <li>• gambling accounts of self-excluded players.</li> </ul> <p>Guideline: A passive gambling account is a gambling account that has not been used by the player for a period of time. This period shall be defined by the licence holder.</p>
10	The licence holder's rules and conditions must state how the customer can exclude themselves and set deposit limits.
11	The licence holder's rules and conditions must state that it is not possible to play on credit.
12	It must be stated in the licence holder's rules and conditions how violations of the licence holder's rules of procedure are handled.

#### 3.1.2 Licence, supervision and labelling scheme

1	On the front page of the licence holder's user interface, it must be stated that the licence holder has a licence from and is under the supervision of the Danish Gambling Authority, and there must be a link to the Danish Gambling Authority's website.
2	The Danish Gambling Authority's label must appear on the licence holder's user interface.
3	The Danish Gambling Authority's label must be placed on the front page of the licence
4	On pages other than the front page of the licence holder's website, the Danish Gambling Authority's label must be easily visible to the player.

#### 3.1.3 Appeals

1	Appeals from players must be recorded in a log, providing information on: <ul style="list-style-type: none"> <li>• the reason for the appeal;</li> <li>• gambling identification;</li> <li>• time of appeal;</li> <li>• the date of the decision; and</li> <li>• the result (acceptance/partial acceptance/rejection).</li> </ul>
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Guideline: An appeal is when a player does not agree with the company's case handling or the result thereof. An appeal can start as a request from a customer who, after discussing the problem with the gambling provider, still does not agree with

	the company's casework or its outcome.
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	<b>3.2 Game account management</b>
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**3.2.1 Customer registration**

1	<p>During the registration process, the base platform shall collect and store the following information about the customer:</p> <ul style="list-style-type: none"> <li>• full name</li> <li>• CPR [Central Person Register] number</li> <li>• country of residence</li> </ul> <p>Guideline: In the period between customer registration and customer identification, cf. section 3.2.2, the licence holder may allow the customer to play from a temporary gambling account.</p> <p>Guideline: If the customer does not have a CPR number, the base platform should obtain an ID number from a document issued by the customer's home country that can</p>
2	<p>The base platform must ensure that the customer is 18 years old or older.</p> <p>Guideline: The base platform may not use time data from the customer's device to</p>
3	<p>The base platform shall record the time of receipt of the customer's registration information</p>
4	<p>The base platform must confirm that the customer is not registered in the Danish Gambling Authority's register of voluntarily excluded players (ROFUS).</p>
5	<p>The base platform must ensure that the transfer of the customer's registration information takes place via an encrypted connection (e.g. SSL).</p> <p>Guideline: Registration of the player is done via the internet, but for online bingo offered via TV, registration can be done using the phone, where encryption</p>

**3.2.2 The customer identification process**

1	<p>The base platform shall store the following documentation for customer identification:</p> <ul style="list-style-type: none"> <li>• full name</li> <li>• CPR [Central Person Register] number</li> <li>• country of residence</li> </ul> <p>Guideline: If the customer does not have a CPR number, the base platform must keep a copy of a document issued by the customer's country of origin that can serve as an identification (e.g. driving licence, passport, etc.).</p>
2	<p>The base platform shall only allow gambling from a gambling account where the customer identification process has been completed correctly. Guideline: This does not exclude gambling from temporary gambling accounts.</p>
3	<p>If a customer is identified by a third party, the documentation must be saved so that there is a clear audit trail to the documentation used by the third party to identify the</p>
4	<p>If the customer identification process has not taken place within one month of registration, the temporary gambling account must be closed.</p>
5	<p>The base platform must ensure that the transfer of customer identification information takes place via an encrypted connection (e.g. SSL).</p>
6	<p>Information about winnings withheld from players, as a consequence of the closure of a temporary gambling account, must be recorded in a log.</p>

### 3.2.3 Use of electronic ID

1	<p>The base platform shall ensure that an electronic ID is used in the following situations:</p> <ol style="list-style-type: none"> <li>1) when creating a gambling account</li> <li>2) when switching and approving a device</li> <li>3) when changing identity information, including name and social security number.</li> </ol> <p>Guideline: By 'electronic ID' is meant e.g. NemID or MitID or another electronic ID approved by the Danish Gambling Authority.</p> <p>Guideline: 'Change and approval of device' is understood to mean situations where a player logs into his/her gambling account from, for example, a smartphone, PC or tablet that the player has not previously used.</p>
2	<p>The base platform shall ensure that the assurance level when using electronic ID, cf. requirement 3.2.3.1, is 'substantial'. The security level substantial shall be in accordance with the description in the NSIS standard on which MitID is based.</p>
3	<p>The base platform shall ensure that strong customer authentication is applied in the following situations:</p> <ol style="list-style-type: none"> <li>1) when depositing into the gambling account</li> <li>2) when withdrawing from the gambling account</li> <li>3) in case of change of payment instrument.</li> </ol> <p>Guideline: 'Strong customer authentication' must comply with the concept in the Payments Act and must therefore be a two-factor authentication consisting of a combination of 'something that the customer is' (biometric data), 'something that the customer knows' (e.g. a password) and 'something that the customer has' (e.g. a smart phone).</p>

### 3.2.4 Customer access

1	<p>If no electronic ID is used for login to the game account, the base platform must ensure that each login clearly identifies the player.</p> <p>Guideline: This could, for example, be by using a strong password or using two-factor authentication, e.g. by making use of the device's ability to use biometric data, such as</p>
2	<p>The base platform must, at each login, confirm that the customer is not registered in the Danish Gambling Authority's register of voluntarily excluded players (ROFUS) before</p>
3	<p>In connection with the customer's login, the base platform must show the date and time of the previous login.</p>
4	<p>The customer must have access to information about the importance of keeping the customer's gambling account details and login details secret.</p>
5	<p>The customer must have access to information on how the customer can detect unauthorised use of his gambling account.</p>
6	<p><b>[TEST]</b> The base platform must ensure that the customer can only be logged on from one device at a time.</p>

### 3.2.5 Means of identification - Applicable only for land-based betting

1	<p>The licence holder must issue a means of identification to registered players.</p>
2	<p>When issuing identification means, the gambling system must confirm that the customer is not registered in the Danish Gambling Authority's register of voluntarily excluded players (ROFUS).</p>
3	<p>The platform shall ensure that the use of the means of identification requires an authentication based on the use of two or more elements categorised as knowledge, possession and intrinsic property that are independent, so that breaches</p>

	of one element does not impair the reliability of other elements and is designed in such a way as to protect the confidentiality of authentication data.
4	The platform must, by using the issued means of identification, confirm that the customer is not registered in the Danish Gambling Authority's register of voluntarily excluded players (ROFUS) before allowing gambling.
5	The gambling system must ensure that a player's bets can only be made using the means of identification issued.
6	The gambling system must ensure that the name and date of birth is made available to the dealer at the gambling site when the issued means of identification is used.
7	The gambling system must ensure that if a player's means of identification is closed, the associated gambling account must also be closed.  Guideline: If a player has both an online and a land-based gambling account, closing the means of identification means does not result in the simultaneous closure of the
8	The platform must ensure that a player's payout at the gambling site can only be made with the use of the issued means of identity. Guideline: The above applies if the licence holder allows payment at the gambling site.

### 3.2.6 Changes to customer information

1	The base platform shall limit the ways in which a customer without a CPR number can recreate and change the password for his/her gambling account to: <ul style="list-style-type: none"> <li>• authorised personnel; and</li> <li>• through known channels of communication such as the customer's registered email address, telephone number or similar.</li> </ul>
2	The base platform shall record and store information about password changes as described in 3.2.6.1
3	The base platform shall store changes to the customer's registration information in an auditable log
4	The base platform must store documentation (customer identification information) in order for changes to the customer's registration information to be correct.
5	The base platform must provide an encrypted connection (e.g. SSL) for changes to customer identification information.

### 3.2.7 Activation and deactivation

1	<b>[TEST]</b> The base platform shall have a function by which authorised personnel can activate and deactivate game accounts.  Guideline: Authorised personnel means personnel who, according to their job description, are assigned user access to perform the activation and deactivation of gambling accounts. Please refer to section 3.1 of document SCP.03.00.DK Management information
2	The base platform shall register in a log each time a game account is deactivated, including the balance in the game account, the reason for the deactivation and the
3	The base platform must be able to form reports listing game accounts grouped by 'enabled' and 'disabled' balances, reasons and employees.
4	The base platform must disable game accounts where the customer identification process has not taken place within one month.

### 3.2.8 Suspension

1	The base platform must have a function by which authorised personnel can suspend customers' access to games
2	<b>[TEST]</b> The base platform shall ensure that the function specified in requirement 3.2.8.1 works
3	The base platform shall keep a record of suspended customers and the reason for their suspension
4	<b>[TEST]</b> Immediately after the suspension, the base platform must not be able to receive new bets from the customers.
5	<b>[TEST]</b> A suspension must result in the customer being unable to make deposits and withdrawals to and from the gambling account.

### 3.3 Responsible gambling

#### 3.3.1 Customer self-restriction

1	<p><b>[TEST]</b> The base platform shall have a feature where the customer can set a deposit limit before play can begin.</p> <p>The customer must set at least one of the following deposit limits:</p> <ol style="list-style-type: none"> <li>a. amount limits for total daily deposits into the gambling account;</li> <li>b. maximum amount for total weekly deposits into the gambling account; or</li> <li>c. amount limits for total monthly deposits into the gambling account.</li> </ol> <p>Guideline: The duration is to be adapted to the Danish calendar.</p> <p>Guideline: A daily deposit limit applies from midnight to midnight. A weekly deposit limit applies from Monday to Sunday. A monthly deposit limit follows the calendar months.</p>
2	<p>The amounts in the deposit limits in accordance with requirement 3.3.1.1 must not be predetermined and no standard amount may have been selected for the player.</p> <p>Guideline: The base platform may offer the player a choice of amount ranges. An upper</p>
3	<p><b>[TEST]</b> As soon as the base platform receives a request from a customer to change to a lower deposit limit set in accordance with requirement 3.3.1.1, the limit shall be implemented for all future gambling activities.</p> <p>Guideline: The new deposit limit can be implemented at the customer's next login if the</p>
4	<p><b>[TEST]</b> The base platform shall ensure that at least 24 hours elapse between receipt of a change request to a higher deposit limit set in accordance with requirement 3.3.1.1 and its</p>
5	<p><b>[TEST]</b> The base platform must provide the customer with a feature that allows the customer to exclude themselves from gambling.</p> <p>As a minimum, the customer must have the opportunity to specify:</p> <ol style="list-style-type: none"> <li>a. a short break in gambling (cooling-off period) of 24 hours;</li> <li>b. exclusion for at least 30 days; and</li> <li>c. exclusion for an unlimited period.</li> </ol> <p>Guideline: The function must be an automated process that the player can activate himself. Contacting the licence holder's customer service via e.g. email with a request for exclusion is not an automated process and therefore not sufficient.</p> <p>Guideline: The duration is to be adapted to the Danish calendar. Except for the cooling off period of exactly 24 hours, self-exclusions must not be less than 30 days.</p>
7	<p><b>[TEST]</b> Immediately upon receipt of a self-exclusion request, cf. requirement 3.3.1.6, the base platform shall not accept any new bets or deposits from the customer (unfinished games may be completed within the game rules and licence terms and conditions).</p>
9	<p>Immediately upon receipt of a self-exclusion request, cf. requirement 3.3.1.6, the customer must be informed of counselling and treatment offers for gambling addiction at a Danish</p>
10	<p>Self-imposed restrictions may not in themselves prevent the customer from paying out funds from the gambling account (access to such funds may, however, be restricted on other grounds, for example if an investigation is in progress).</p>
11	<p>If the customer is definitively excluded from gambling (i.e. without limiting the duration), the customer's gambling account must be closed and a gambling account for the same customer may only be created after at least 1 year.</p>
12	<p>Immediately upon receipt of a request for final exclusion, the base platform shall notify the customer that all released funds will be withdrawn from the gambling account.</p> <p>Guideline: In this situation, the licence holder must immediately initiate the procedure for the withdrawal of all released funds, which may involve contacting the player to</p>
13	<p>All features of the Base platform relating to self-exclusion (temporary and final) must inform customers about the possibility of registering in the Danish Gambling Authority's register of voluntarily excluded players (ROFUS) and link to</p>

	the register.
	<b>3.3.2 Information on player protection</b>

1	The licence holder's user interface must state that persons under the age of 18 are not allowed to participate in the games.
2	The licence holder's user interface must inform about responsible gambling and the potential harmful effects of gambling.
3	The licence holder's user interface must include a link to a self-test for gambling addiction.
4	The user interface of the licence holder must provide information and contact addresses of Danish treatment centres.
5	The licence holder's user interface must provide information about the possibility of registering in the Danish Gambling Authority's register of voluntarily excluded players
6	The licence holder's user interface must provide information about the Danish Gambling Authority's helpline for responsible gambling.
7	The licence holder's user interface shall link to a recognised filtering programme or other programmes that allow customers to configure their computers to prevent access to
8	The user interface of the licence holder shall contain information on, or link to, the terms and conditions applicable to the customer.
9	The information referred to in the requirements of this section shall be prominently displayed on the licence holder's user interface and shall be accessible from all pages.  Guideline: The information must not be given in imprecise language or mixed with other information. The player must not be able to overlook the information.

### 3.4 Funds and transactions

#### 3.4.1 Currencies

1	The base platform shall handle exchange rates in an unambiguous, automatic and systematic manner.  Guideline: The client shall have access to information on which currencies the Base
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#### 3.4.2 Payments

1	The base platform shall clearly and prominently inform the client of any restrictions on deposits and access to funds in connection with depositing funds.  Guideline: If there is any discrepancy between the depositing and availability of funds, leading to a delay in customer access to such funds, the customer must be given clear information about this before the deposit is made.
2	The base platform must, in connection with the deposit of funds, provide the customer with unambiguous information about all fees.  Guideline: If there are any fees connected to a deposit or a related withdrawal and/or release of funds, the customer must be given clear information about this before the
3	The base platform shall only accept deposits of up to DKK 10,000 (or its equivalent in other currency) for a temporary gambling account.  Guideline: This limit is a cumulative sum of all deposits made by the customer.
4	The base platform must only be able to receive deposits into a gambling account from a payment service provider that is offered legally in Denmark.
5	The base platform must credit the gambling account immediately after the customer's deposit is received.
6	The base platform shall have an auditable log of all funds deposited. The log must, as a minimum, contain information on:

	<ul style="list-style-type: none"> <li>• date and time</li> <li>• payment channel</li> <li>• customer</li> <li>• amount</li> <li>• type of transaction (i.e. "deposit")</li> </ul>
7	The base platform must be able to form reports that accurately show deposited funds.
8	The base platform must be able to form reports that accurately indicate all funds deposited into customers' accounts grouped by payment channel.
9	The base platform must be able to form reports that accurately indicate all rejected deposit attempts.

### 3.4.3 Disbursements

1	<p>The base platform shall only be able to withdraw from gambling accounts where customer identification has taken place.</p> <p>Guideline: Payments may not be made from a temporary gambling account, but any residual funds deposited may be refunded.</p>
2	The base platform must not allow a payout that will result in the customer's balance becoming negative.
3	<p>The base platform must allow customers to withdraw all released funds.</p> <p>Guideline: This does not limit the opportunities for the licence holder to check payment frequencies, identities, etc.</p>
4	<p>The base platform shall clearly and prominently inform the client of all restrictions on withdrawals and access to funds related to withdrawals.</p> <p>Guideline: If there is any discrepancy between the withdrawal and availability of funds, leading to a delay in customer access to such funds, the customer must be given clear information about this before the payment is made.</p>
5	<p>The base platform must, in connection with the withdrawal of funds, provide the customer with clear and clear information about all fees.</p> <p>Guideline: If there is any fee associated with a deposit or a related disbursement and/or the release of funds, the customer must be unambiguously informed of this before the</p>
6	<p>The base platform shall have an auditable log of all funds disbursed. The log must, as a minimum, contain information on:</p> <ul style="list-style-type: none"> <li>• date and time</li> <li>• payment channel</li> <li>• customer</li> <li>• amount</li> <li>• type of transaction (i.e. "payment")</li> </ul>
7	The base platform must be able to form reports that accurately show disbursed funds.
8	The base platform must be able to form reports that accurately indicate all funds disbursed on customers' accounts grouped by payment channel.
9	The base platform must be able to form reports that accurately indicate all rejected payout attempts.

### 3.4.4 Other customer transactions

1	The base platform must not allow transfers of funds etc. between different players' gambling accounts.
2	The base platform must debit the customer's game account immediately after a wager is placed in a game.
3	The base platform may not allow wagering in a game that may result in the customer's balance becoming negative.
4	<p>The base platform must credit winnings to the game account immediately.</p> <p>Guideline: Winnings may be withheld for further investigation of results, etc.</p>
5	The base platform must keep a log of all transfers between game accounts and individual games.
6	The base platform must be able to form reports that accurately show the transfer of funds to and from games.



**3.4.5 Other account movements, bonuses, etc.**

1	The base platform shall provide clear and prominent information to customers about the reason for any other account movements. Guideline: For example, "other account movements" may be debits and credits related to bonuses.
2	The base platform must provide clear and transparent information to customers about the terms, conditions and restrictions that occur in connection with any other account
3	The base platform must have an auditable log of all other account movements, bonuses, etc.
4	<p>The base platform must be able to form reports that accurately show all other account movements, bonuses, etc. The reports shall include at least information on:</p> <ul style="list-style-type: none"> <li>• transaction ID</li> <li>• amount of the bonus</li> <li>• bonus status</li> </ul> <p>Guideline: The amount of the bonus is the amount that the licence holder allocates to the player. The amount is stated regardless of whether the player managed to meet the wagering requirement or not.</p>

**3.4.6 Statements of account, etc.**

1	The base platform shall, as a minimum, provide the customer with access to information about the gambling account balance, gambling history (including stakes, winnings and losses), deposits and withdrawals and other related transactions.
2	<p>The base platform shall allow the customer to request a statement of all transactions in the gambling account.</p> <p>Guideline: The process of forming this statement and making it available to the</p>
3	The customer must have access to indicative text about transactions in the customer's gambling account

**3.5 Reports**

**3.5.1 General**

1	The reports described in 3.4.2.7, 3.4.2.8, 3.4.2.9, 3.4.3.7, 3.4.3.8, 3.4.3.9, 3.4.4.6 and 3.4.5.4 together shall provide a complete picture of all financial transactions and
2	<p>The base platform must be able to analyse inactive game accounts and on this basis form reports.</p> <p>Guideline: An inactive account is defined as an account where there has never been any</p>
3	The base platform must be able to form reports identifying gambling accounts with a positive balance that have been closed for more than 5 business days.
4	The base platform must be able to form reports of all customer registrations (complete and incomplete)
5	The base platform must be able to form reports of all registered customers, their account information (including also inactive gambling accounts), and the date of
6	The base platform shall be able to form reports of all suspended and/or self-excluded customers
7	The base platform must be able to form reports of all customers with a self-selected limited game consumption
8	The base platform must be able to form reports of all closed gambling accounts within a given financial year (including the reason for the closure).
9	<p>The base platform must be able to form reports for each individual gambling account and across gambling accounts:</p> <p>Guideline: The reports shall be able to provide information on:</p>

	<ul style="list-style-type: none"><li>• additional payments;</li><li>• commission, rake, etc.;</li><li>• winnings;</li><li>• disbursements;</li><li>• fees;</li><li>• other account movements; and</li><li>• funds in accounts that have been inactive for more than 90 days.</li></ul>
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# Platform functions

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## 4.1 Operations

### 4.1.1 General

1	The user interface must have a clock that allows the customer to orient themselves on time consumption. The clock must be visible to the customer all the time, and may not
2	The betting platform shall display the results of events on which bets have been offered.

### 4.1.2 Recording, maintenance and storage of data

1	<p>The base platform must record at least the following customer actions in a log through a session. A session is counted from when a customer logs in until the customer is no longer logged in (regardless of the reason):</p> <ul style="list-style-type: none"> <li>• Customer ID,</li> <li>• the start and end time of the session;</li> <li>• details of the customer's equipment;</li> <li>• total amount deposited at the session;</li> <li>• total amount won at the session;</li> <li>• the total amount paid into the gambling account during the session (time stamp);</li> <li>• the total amount paid out from the gambling account during the session (time stamp);</li> <li>• the time of the last confirmation of the session;</li> <li>• the reason for the end of the session; and</li> <li>• information about games during the session</li> </ul> <p>Guideline: Information about the customer's session must not be lost if the session is</p>
2	<p>The base platform shall record at least the following customer information:</p> <ul style="list-style-type: none"> <li>• customer creation/gambling account creation;</li> <li>• customer identification information;</li> <li>• changes in customer information;</li> <li>• deactivation/closure of gambling account;</li> <li>• game account information and balance;</li> <li>• suspension and self-exclusion status;</li> <li>• customer self-exclusions, including both the request for and the termination of the exclusion itself;</li> <li>• customer suspensions, including both the request and the lifting of the suspension itself;</li> <li>• previous gambling accounts and the reason for their deactivation; and</li> </ul>
3	<p>The base platform shall retain customer identity and verification information about the customer for at least five years after the customer relationship has ended.</p>
4	<p>The base platform shall record and maintain at least the following information about games:</p> <ul style="list-style-type: none"> <li>• customer ID;</li> <li>• identification of the game and version;</li> <li>• the starting time of the game based on the base platform;</li> <li>• balance at the start of the game;</li> <li>• wager (time stamp);</li> <li>• contributions to jackpot pools;</li> <li>• game status (unfinished, closed, etc.);</li> <li>• result of the game (time-stamped);</li> <li>• jackpot prize (if applicable);</li> <li>• game end time based on base platform;</li> </ul>

	<ul style="list-style-type: none"> <li>• game account balance at the end of play; and</li> <li>• games that are not completed and the reason for this.</li> </ul>
5	<p>The base platform shall record information on at least the following events:</p> <ul style="list-style-type: none"> <li>• Transfers of large amounts of money (individual and total transfers over a defined period of time);</li> <li>• high winnings (to be determined by the licence holder);</li> <li>• changes in game parameters;</li> <li>• the creation of the jackpot;</li> <li>• changes to jackpot parameters;</li> <li>• customer participation in jackpots;</li> <li>• triggering jackpot (jackpot wins);</li> <li>• deactivation/activation of the jackpot;</li> <li>• discontinuation/termination of the jackpot;</li> </ul>
6	<p>The base platform shall keep documents and records relating to the customer's games and transactions for at least five years from the completion of the game or transaction.</p>

# Control of game functions

5

## 5.1 General

### 5.1.1 Game flow

1	<p><b>[TEST]</b> The platform must ensure that a customer cannot start a new game until the current game is complete and all logs and balances are updated.</p> <p>Guideline: This does not prevent a customer from being able to play several different</p>
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### 5.1.2 Game activation and deactivation

1	<b>[TEST]</b> The base platform must have a function that can deactivate the individual game immediately.
2	<b>[TEST]</b> The base platform must have a feature that can disable all games instantly.
3	<b>[TEST]</b> The base platform must have a function that can activate and deactivate the individual customer's gambling activity immediately.
4	Information on activation and deactivation must be saved in a log.
5	When a game is disabled, it must not appear on the user interface and it must remain inaccessible during the deactivation period.
6	When a game is disabled, the customer must be able to complete ongoing games.
7	<b>[TEST]</b> When a game that may be in multiple modes (e.g. a slot machine that has a feature game in which the game changes mode between the main game and the feature game) is disabled, customers must be able to continue from the current mode when the game is re-enabled. This option may, however, lapse after a period specified in the rules

### 5.1.3 Unfinished games

1	<p><b>[TEST]</b> The base platform shall allow the customer to access and complete unfinished games.</p> <p>Guideline: Unfinished games include: (a) loss of communication, (b) system restart, (c) game disabled/enabled, (d) customer restarts, (e) abnormal termination of client programme, etc. After re-establishment, the systems must show the customer the unfinished games.</p> <p>Guideline: A situation where a customer loses the connection to a peer-to-peer game</p>
2	<p>The base platform shall ensure that unfinished games are accounted for and that the customer has easy access to the status of those games, including the customer's stake.</p> <p>Guideline: Unfinished games and the stake in the game must appear separately from the</p>
3	<p>The base platform must ensure that unfinished games are settled if the customer has not completed them after 90 days.</p> <p>Guideline: The rules of the game must state what happens to the customer's bet if the customer has not completed the game within 90 days.</p>
4	The customer's deposit in a game must not be negatively affected in the event of a breakdown or restart of the platform, game or parts thereof.

### 5.1.4 Error handling

1	The procedure for dealing with errors on the platform or at stake shall be clearly set out in the licence holder's rules and conditions.
2	The base platform shall immediately register all defects of the platform. The cause and solution are recorded when these are known.
3	The base platform shall be able to form a report based on data collected in accordance with 5.1.4.2.

4	The customer's finances must not be adversely affected in the event of errors on the platform or in the game
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The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Information security management system -  
SCP.03.00.DK.3.0

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# Purpose of information security management system

1

The information security management system shall ensure that the licence holder's base platform and business system and the game supplier's gambling platform and business system are protected against any threats and secure the sensitive information contained in the systems. By ensuring the integrity and access to the platforms and business systems, a number of important security considerations are taken into account in relation to the licence holder's and the game supplier's business, but also in relation to the protection of players' information and confidential information on third parties.

## 1.1 Version

Version 1.0 of 2014.07.04

- New structure compared to the previous version 1.3, as well as a number of updates in a number of areas. Therefore, a new version 1.0 is issued. The intention in the future is to follow normal version numbering.

Version 1.1 of 2015.12.21

- Extension of the scope to include the provision of lotteries and betting on horse and dog races.

Version 1.2 of 2020.01.01

- The Danish Gambling Authority has removed the requirement that the testing company's accreditation must refer to a specific version, cf. section 2.3.

Version 2.0 of 2023.01.01

- Clarification of which test companies can carry out any ISO 27001 certification, cf. section 2.2. Update of requirements for accredited test companies and staff. In addition, general adjustments and specifications have been made.

Version 2.1 of 2023.10.01

- Updated visual layout of the document. A few linguistic corrections. No changes to requirements.

Version 3.0 of 2025.01.01

- Corrections have been made in relation to the introduction of licences for game suppliers, which means that the concept of gambling system has been changed to the concepts of 'base platform' and 'gambling platform'. The section on requirements for supervisors has been amended.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority publishes, if necessary, guidelines for a transitional scheme and the validity of already completed certifications.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

The information security management system applies to the provision of online betting (§ 11 of the Gambling Act), land-based betting (§ 11 of the Gambling Act), online casinos (§ 18 of the Gambling Act) and the provision of gambling (§ 24a of the Gambling Act).

# Frequency and testing companies

2

## 2.1 Frequency of certification

The licence holder and game supplier are responsible for ensuring that certification is carried out in accordance with the requirements of this document at intervals of no more than 12 calendar months.

### 2.1.1 First certification

The licence holder and game supplier must be certified for the first time before a licence can be issued, unless the Danish Gambling Authority has stated otherwise. See section 2.1.3 of the General Requirements for further details.

### 2.1.2 Re-certification

The licence holder and game supplier must as a rule have undertaken a new certification within 12 months from the latest certification. The standard report shall state when the latest re-certification was performed.

The standard report documenting the re-certification must be received by the Danish Gambling Authority no later than two months after the certification has been made.

### 2.1.3 Postponement of recertification

The licence holder and game supplier may postpone certification up to two months from the time when a new certification should have been made. The new certification must be completed no later than 14 months from the latest certification and the standard report must be received by the Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be informed before the certification is postponed.

The deadline for re-certification shall be shortened by the time the previous 12-month deadline has been postponed. For example, if the maximum two months of postponement is used, the next certification must be renewed after 10 months. The timing of the next certification shall reflect this in the standard report.

## 2.2 Certification in relation to an applicable ISO/IEC 27001

If the licence holder or game supplier is certified in relation to an applicable ISO/IEC 27001, it is normally expected that the licence holder's or game supplier's management system for information security is of such a quality that certification in relation to the Danish Gambling Authority's management system for information security SCP.03.00 is unnecessary.

It is a prerequisite that certification of the information security management system is carried out as accredited certification by a



certification body that is accredited according to ISO/IEC 17021-1 for certification according to ISO/IEC 27001 by DANAK (The Danish Accreditation Fund) or an equivalent accreditation body that is a signatory of EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition with regard to certification of management systems or for certification bodies outside EA's territory by an accreditation body that is a signatory of the relevant multilateral agreement on mutual recognition under the IAF (International Accreditation Forum).

It is a prerequisite that the total scope of the licence holder's or game supplier's ISO/IEC 27001 certification covers the entire base platform or game platform in its completeness, as defined in the Gambling Act, and any work process related to the platforms, as well as all geographical locations of the platforms.

In order to be able to decide whether the above is fulfilled, the accredited testing company must have access to:

- applicable ISO/IEC 27001 certification;
- Statement of Applicability; and
- the risk assessment.

And on this basis, the accredited testing company can then issue certification that replaces a certification in relation to the Danish Gambling Authority's management system for information security SCP.03.00.DK.

## 2.3 Accredited testing companies

In order to ensure that the necessary qualifications are present when a certification is carried out, the testing company and its employees must meet the requirements of this section.

### 2.3.1 Requirements for testing companies

Certification of the information security system must be carried out as accredited certification by a certification body that is accredited to ISO/IEC 17021-1 or ISO/IEC 17065 for certification under the Danish Gambling Authority's Certification Programme SCP.03.00.DK by DANAK (The Danish Accreditation Fund) or an equivalent accreditation body that is a signatory of EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition with regard to certification of management systems or for certification bodies outside EA's territory by an accreditation body that is a signatory of the relevant multilateral agreement on mutual recognition under the IAF (International Accreditation Forum).

Documentation of the testing company's accreditation shall be attached to the certification report. Alternatively, a link to the accreditation in the certification report can be provided.

### 2.3.2 Requirements for personnel carrying out the certification work

The certification work shall be carried out by personnel suitably qualified in accordance with the requirements of section 7 of ISO/IEC 17021-1 or section 6 of ISO/IEC 17065. The accredited testing company must therefore recruit and train suitably qualified, competent and experienced personnel.

### 2.3.3 Supervision and signing of standard report

The performance of the certification work shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General Requirements. It is the supervisor's responsibility to sign the standard report and thereby guarantee that the certification has been carried out professionally.

# Information security management system requirements

# 3

The information security of the licence holder and game supplier depends to a large extent on the security of the base platform, gambling platform, the business systems and the business processes surrounding it, and that unauthorised persons cannot access information to which they are not entitled.

Licence holder and game supplier personnel have a key role in accessing the platforms. Therefore, their access to both the base platform, the gambling platform and the business system must be clearly defined and agreed in their employment relationship with the licence holder or the game supplier. This is to help to limit unauthorised access to the base platform, gambling platform and business system.

Technically, there are a number of operational measures that licence holders and game suppliers must implement to ensure the integrity of the base platform, the gambling platform and the business system. In addition, there are requirements for the use of secure communication channels. Information security must also be considered in the way the base platform, gambling platform and business system are developed, so that data is not distorted due to a lack of validation of data input from applications.

Third parties may also have access to the base platform, gambling platform, business systems or management system around these if, for example, they are subcontractors or occupy another position in the licence holder's or game supplier's business which requires access to the base platform, gambling platform, business system or management system.

Regardless of who has access to the base platform, gambling platform and business system, this access must be tailored to the individual, so that people cannot access information that is extraneous to the work they do.

## 3.1 Personnel management

The licence holder and game supplier must have a policy for creating, modifying and terminating staff's user access to base platform, game platform and business systems. Based on the policy, a formal procedure shall be developed to ensure:

- the existence of a detailed job description for each employee;
- provision of user access to the base platform, game platform and business system in accordance with the employee's work description;
- that the user access is modified in accordance with a modified work description; and
- the user access is terminated upon termination of the employee's employment.

Equivalent policies and procedures shall be in place for consultants' and/or other third parties' user access to the base platform, gambling platform and the business system if such access is granted to them.

## 3.2 Communication and operations management

### 3.2.1 Procedure and responsibilities for operation

The base platform, gambling platform and business systems shall be capable of shutting down appropriately in the event of a power failure. Emergency power is therefore required to ensure data integrity, logs, backup and to ensure that ongoing games can be run and completed.

### **3.2.2 Planning and monitoring of resources**

Base platform, gambling platform and business systems must keep a log of system performance and on this basis be able to form reports.

The resource consumption of the systems needs to be monitored and adjusted, and future capacity requirements need to be forecast to ensure the required performance.

### **3.2.3 Protection against malicious code**

The base platform, gambling platform and business systems shall have tools to detect and prevent the intrusion and insertion of unauthorised code.

### **3.2.4 Backup**

The base platform, gambling platform and business systems must backup all operationally critical data and must be able to restore all operationally critical data from backup.

The base platform, gambling platform and business systems shall be able to restore all critical data generated during the period from the time of the last backup to the time when a system crash occurred or a system failure occurred.

### **3.2.5 Network security**

The base platform, gambling platform and business systems must be designed so that devices in the same broadcast domain(s) cannot create network access bypassing the firewall.

Equipment used as a firewall shall be dedicated to the firewall function and contain only firewall-related user accounts and features.

Access to the firewall shall be limited to workstations included in the configuration output point, as defined in the Danish Gambling Authority's system change management programme SCP.06.00.DK, and shall reject all data packets that come from locations other than workstations included in the configuration output point.

The firewall must maintain an auditable log of all system changes affecting connection permissions and all successful and unsuccessful attempts to access it.

### **3.2.6 Use of public networks**

Where the licence holder or game supplier uses public networks for data traffic between geographically dispersed subsystems, the information shall be encrypted and the subsystems shall use authentication.

All communication between geographically dispersed subsystems shall protect against:

- incomplete transmission;
- misrouting, unauthorised message alteration;

- unauthorised disclosure;
- unauthorised message duplication; and
- unauthorised replay.

The licence holder and game supplier shall use a secure primary DNS and a secure secondary DNS that is logically and physically separate from the primary DNS.



### **3.2.7 Surveillance**

Base platform, gambling platform and business systems shall maintain auditable logs recording:

- user activity;
- exemptions (exceptions); and
- information security incidents.

The auditable logs shall be kept for at least 5 years and shall be protected against unauthorised access.

The base platform, gambling platform and business systems shall record all failures and breakdowns as well as continuously monitor the use and functioning of essential system components. The materiality follows from the classification of components in the Danish Gambling Authority's programme for managing system changes SCP.06.00.DK.

### **3.2.8 Time synchronisation**

Time synchronisation shall take place with an authoritative time server on the base platform, gambling platform and business systems at an appropriate interval, in order to ensure consistency in the timestamp used, for example, in connection with registration in logs.

## **3.3 Access control**

Licence holder and game supplier must have access control to protect the systems hardware, as well as user access to the systems.

### **3.3.1 Physical access control**

There must be physical access control to access to the hardware on which the base platform, game platform and business systems run, as well as other equipment from which one can access systems.

The level of access control must be adapted to the materiality of the systems that can be accessed from the equipment in question.

### **3.3.2 User access**

The base platform, gambling platform and business systems shall require strong passwords for user access to the system, and the screen saver shall be activated or automatically log the user out of the system upon prolonged inactivity.

### **3.3.3 Staff access**

The ability to provide access to the base platform, gambling platform and business systems must be limited to as few employees as possible, and both the base platform, gambling platform and business systems must be able to support differentiated user access,

so that the policy and procedure for personnel management, cf. section 3.1, can be implemented in practice.

The first-time password must be changed to a password chosen by the user at the first login.

### **3.3.4 Access control and network security**

Access control shall be provided to the base platform, the gambling platform and the network functions of the business systems, and user access shall be possible only through this access control. The base platform, gambling platform and business system must prevent unauthorised internal and external access to network functions.

The base platform, game platform and business systems must use segregated networks so that groups of related functions, users and subsystems can be kept separate from each other.

### **3.3.5 Access control and security in relation to control systems**

All users must have a unique username/ID for personal use only, and the base platform, gambling platform and business systems must use appropriate authentication methods to ensure the user's identity upon login.

Network traffic management shall be used to control access to the operating system of essential system components. The materiality follows from the classification of components in the Danish Gambling Authority's programme for managing system changes SCP.06.00.DK.

When an operating system is installed on equipment that is part of the base platform or gambling platform, only functions that are strictly necessary for the equipment to fulfil its intended purpose may be installed/activated. Under no circumstances may programmes and the like that may override access control be installed on the base platform, gambling platform and business systems.

### **3.3.6 Access control and security in respect of applications and information**

All users must have a unique username/ID for personal use only, and the base platform, gambling platform and business systems must use appropriate authentication methods to ensure the user's identity upon login.

Sensitive information must be stored and sent in encrypted form, and the base platform, gambling platform and business systems must ensure a particularly strict access control for users' access to these.

## **3.4 Data validation, etc.**

### **3.4.1 Correct data processing in applications**

Application data inputs shall be validated to ensure that data inputs are appropriate in the context in question and are not harmful to the base platform, gambling platform and business systems.

Continuous automatic data validation shall be incorporated into all applications to safeguard against data corruption and operational disruptions.

Data output from applications must be validated to ensure that the saved information has been processed correctly.

**3.4.2 Secure encryption keys and digital signatures** Encryption keys, digital signatures and the like shall be stored securely.





The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Penetration test requirements – SCP.04.00.DK.3.0

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# Purpose of penetration testing requirements

1



Penetration testing requirements shall ensure that the base platform, gambling platform and business systems are tested in order to identify possible exploitation of any weaknesses in the systems. Weaknesses that can potentially be exploited to gain unauthorised access to e.g. sensitive information or impact on the game's running.

## 1.1 Version

Version 1.0 of 2014.07.04

- New structure compared to the previous version 1.3, as well as a number of updates in a number of areas. Therefore, a new version 1.0 is issued. The intention in the future is to follow normal version numbering.

Version 1.1 of 2015.12.21

- Extension of the scope to include the provision of lotteries and betting on horse and dog races.

Version 1.2 of 2020.01.01

- The Danish Gambling Authority has removed the requirement that the testing company's accreditation must refer to a specific version, cf. section 2.2.

Version 2.0 of 2023.01.01

- Update of requirements for accredited test companies and staff. Clarification of requirements if penetration test failed. Section on the use of internal function has been removed. In addition, general adjustments and specifications have been made.

Version 2.1 of 2023.10.01

- Updated visual layout of the document. A few linguistic corrections. No changes to requirements.

Version 3.0 of 2025.01.01

- Consequential corrections have been made on the basis of the introduction of supplier licences. Added CREST accreditation for penetration testing, as recognised accreditation for testing company.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority will, if necessary, publish guidelines for a transitional scheme and the validity of penetration tests already carried out.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

Penetration testing requirements apply to the provision of online and land-based betting (§ 11 of the Gambling Act), online casinos (§ 18 of the Gambling Act) and the provision of gambling (§ 24a of the Gambling Act).

# Frequency and testing companies

2

## 2.1 Frequency of penetration testing

Licence holders and game suppliers are responsible for ensuring that penetration testing is carried out at intervals of no more than 12 calendar months in accordance with the requirements of this document.

### 2.1.1 First penetration test

Licence holders and game suppliers must have completed a penetration test for the first time before a licence to offer or supply gambling can be issued, unless the Danish Gambling Authority has stated otherwise. See sections 2.1.2 and 2.1.3 of the general requirements for further details.

### 2.1.2 Renewed penetration test

Licence holders and game suppliers must, as a rule, have completed a new penetration test within 12 months from the latest penetration test. The standard report shall indicate when a renewed penetration test has been carried out.

The standard report, which documents the renewed penetration test, must be received by the Danish Gambling Authority no later than two months after the penetration test has been carried out.

#### 2.1.2.1 Postponement of penetration testing

Licence holders and game suppliers may choose to postpone the penetration test up to two months from the time when a new penetration test should have been completed. The new penetration test must be completed no later than 14 months from the latest penetration test and the standard report must be received by the Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be informed before the penetration test is postponed.

The deadline for the renewal of penetration tests shall be shortened by the time the previous 12-month deadline has been postponed. For example, if advantage is taken of the maximum two months of postponement, the next penetration test must be carried out after 10 months at the latest. The expected time of the next penetration test shall reflect this and shall be indicated in the standard report.

## 2.2 Testing companies

In order to ensure that the necessary qualifications are available to perform a penetration test, the testing company and its employees shall comply with the requirements of this section.

### 2.2.1 Requirements for testing companies

Testing companies must obtain at least one of the following accreditation/approvals:

- CREST Accredited Penetration Testing

- ISO/IEC 17025 accreditation according to the Danish Gambling Authority's certification programme for betting and online casinos SCP.04.00.DK, or
- ISO/IEC 17065 accreditation according to the Danish Gambling Authority's certification programme for betting and online casinos SCP.04.00.DK, or
- Approved Scanning Vendor (ASV) approval.

CREST accreditation is carried out by the CREST membership body.

ISO accreditation must be carried out by DANAK (the Danish Accreditation Fund) or an equivalent accreditation body that is a signatory to EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition for testing or, for certification bodies outside EA's territory, by an accreditation body that is a signatory to ILAC's (the International Laboratory Accreditation Cooperation) multilateral agreement on mutual recognition for testing.

ASV approval is carried out by the Payment Card Industry (PCI) Security Standards Council (SSC).

Documentation of the testing company's CREST accreditation, ISO accreditation or ASV approval shall be attached to the standard report. Alternatively, a link to accreditation or approval can be provided in the standard report.

### **2.2.2 Requirements for personnel performing the penetration test**

Penetration testing shall be carried out by suitably qualified personnel. The testing company must therefore recruit and train suitably qualified, competent and experienced personnel. It is expected that the personnel performing penetration testing have at least 5 years of practical experience with penetration testing and have a personal certification demonstrating competence for penetration testing. For example, it could be one of the following:

- Offensive Security Certified Professional (OSCP);
- EC Council: Certified Ethical Hacker (CEH), Licensed Penetration Tester Master (LPT Master);
- Global Information Assurance Certification (GIAC); GIAC Certified Penetration Tester (GPEN), GIAC Web Application Penetration Tester (GWAPT), or GIAC Exploit Researcher and Advanced Penetration Tester (GXPN)'
- CREST Penetration Testing Certifications;
- Communication Electronic Security Group (CESG) IT Health Check Service (CHECK) certification;
- Tiger Scheme: Senior Security Tester, Qualified Security Tester.

### **2.2.3 Supervision, assessment and signing of the standard report**

The conduct of the penetration test shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General Requirements. In addition, the result of the penetration test and the need for any derived vulnerability repairs shall be assessed. It is the supervisor's responsibility to assess the result of the

penetration test and sign the standard report, thereby guaranteeing that the penetration test has been carried out professionally.

*Guideline: A person who supervises, assesses and signs can also participate in the penetration test, cf. the requirements for supervision in section 2.3 of SCP.00.00 General requirements.*

# The framework for penetration testing

# 3



The Danish Gambling Authority's requirements for penetration testing are based on experience gained from supervision in the area, recommendations from and dialogue with the industry.

### 3.1 Purpose of penetration testing

The purpose of penetration testing is to identify and try to exploit any weaknesses in the base platform, gambling platform and business systems.

### 3.2 Protected components

The platforms and business systems of the licence holder's and game supplier's production environment shall be protected against possible attacks by unauthorised persons. In particular, components containing sensitive information about customers shall be protected. The definition of components and their materiality must be seen in connection with the Danish Gambling Authority's programme for managing system changes SCP.06.00.DK, section 3.3.3.

By segmenting their internal networks, including which parts of the system communicate via public networks with sensitive information, licence holders and game suppliers can reduce the risk of unauthorised access.

#### 3.2.1 Updating software and hardware

It is the responsibility of the licence holder and the game supplier that the components of the systems are updated to a level that provides the highest possible security and does not compromise the integrity of the systems in order to reduce the risk of unauthorised access.

# The process for conducting penetration tests

# 4

At intervals of no more than 12 months, the licence holder shall have conducted a penetration test of their base platform and business systems.

At intervals of no more than 12 months, the game supplier must have conducted a penetration test of their gambling platform and business systems.

*Guidance note: base platform', 'gambling platform' and 'business system' are defined in the general requirements and include both frontend, backend, data warehouse and games.*

The penetration test must include, but not be limited to, any weaknesses that have been identified during the vulnerability scan, cf. the Danish Gambling Authority's requirements for vulnerability scanning SCP.05.00.DK.

The testing service must also attempt to gain unauthorised access to the base platform, gambling platform and business system. The unauthorised access must be attempted escalated to the highest level of access, and carried out both with and without access credentials (white box/black box). This shall test at least the following scenarios:

- Manipulation of result generation
- Influence on the conduct of the game
- Fraud with players' funds
- Theft of players' funds
- Manipulation of auditable logs
- Access to sensitive information
- Manipulation of sensitive information
- Manipulating data transfer to SAFE

## 4.1 Standard report and plan for 'failure' penetration testing

The standard report shall indicate whether the penetration test has 'passed', 'passed with corrections' or 'not passed'.

'Pass' shall be used when the penetration test has been carried out without the detection of vulnerabilities.

'Passed after corrections' shall be used when the penetration test has shown vulnerabilities that have been fixed and a subsequent test has shown that the vulnerabilities are no longer present.

'Not passed' must be used if there are vulnerabilities that cannot be fixed before the deadline for submitting the report to the Danish Gambling Authority expires. In this situation, an annex must be submitted with the standard report containing a plan for the correction of vulnerabilities and a description of compensatory controls. The licence holder or game supplier shall then rectify the vulnerabilities as soon as possible and no later than three months after completing a new penetration test covering the identified vulnerabilities.

After renewed penetration testing, documentation must be submitted to the Danish Gambling Authority that the vulnerabilities have been rectified.

In practice, a 'failure' report cannot be accepted by the Danish Gambling Authority without the annex containing a plan for rectification and description of compensatory checks.

If a full penetration test of the licence holder's base platform and business systems or game supplier's gambling platform and business systems has been carried out after vulnerability correction, the date of completion of this penetration test will be the starting point for setting the deadline for the next penetration test.





The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Vulnerability Scanning Requirements –  
SCP.05.00.DK.3.0

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# Purpose of vulnerability scanning requirements

1

Vulnerability scanning requirements shall ensure that the base platform, gambling platform and business systems are scanned in order to identify any weaknesses in the systems. Vulnerabilities that can potentially be exploited to gain unauthorised access to e.g. sensitive information or impact on the game's running.

## 1.1 Version

Version 1.0 of 2014.07.04

- New structure compared to the previous version 1.3, as well as a number of updates in a number of areas. Therefore, a new version 1.0 is issued. The intention in the future is to follow normal version numbering.

Version 1.1 of 2015.12.21

- Extension of the scope to include the provision of lotteries and betting on horse and dog races.

Version 1.2 of 2020.01.01

- The Danish Gambling Authority has removed the requirement that the testing company's accreditation must refer to a specific version, cf. section 2.2.

Version 2.0 of 2023.01.01

- Update of requirements for accredited test companies and staff. Clarified that Vulnerability Scanning must be PCI approved. Clarification of requirements if vulnerability scan failed. Section on the use of internal function has been removed. In addition, general adjustments and specifications have been made.

Version 2.1 of 2023.10.01

- Updated visual layout of the document. A few linguistic corrections. No changes to requirements.

Version 3.0 of 2025.01.01

- Consequential corrections have been made on the basis of the introduction of supplier licences. CREST Accredited Vulnerability Scanning has been added as recognised accreditation for testing business. Added CREST certifications, as recognised personal certifications for personnel who organise/perform vulnerability scanning.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority will, if necessary, publish guidelines for a transitional arrangement and the validity of vulnerability scans already carried out.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

Vulnerability Scanning Guidelines apply to the provision of online and land-based betting (§ 11 of the Gambling Act), online casino (§ 18 of the Gambling Act) and the provision of gambling (§ 24a of the Gambling Act).

# Frequency and testing companies

2

## 2.1 Vulnerability scan frequency

Licence holders and game suppliers are responsible for ensuring that a vulnerability scan is conducted at intervals of no more than three calendar months in accordance with the requirements of this document.

### 2.1.1 First vulnerability scan

Licence holders and game suppliers must have performed a vulnerability scan for the first time before a licence can be issued to offer or provide gambling, unless the Danish Gambling Authority has stated otherwise. See sections 2.1.2 and 2.1.3 of the general requirements for further details.

### 2.1.2 Renewed vulnerability scan

After the first vulnerability scan, the licence holder and game supplier must have performed a new vulnerability scan within three months of the last vulnerability scan. The standard report shall state when a re-scan has been carried out.

The standard report documenting the renewed vulnerability scan must be received by the Danish Gambling Authority no later than one month after the vulnerability scan has been carried out.

### 2.1.3 Vulnerability scan for penetration testing

The vulnerability scan to be performed prior to licensing and one of the minimum four vulnerability scans to be performed annually may have been performed in connection with a penetration test conducted in accordance with "SCP.04.00 - requirements for penetration testing".

In order for a vulnerability scan performed in the context of a penetration test to be considered a valid vulnerability scan under the certification programme, it must have been performed in accordance with the requirements of this document.

## 2.2 Testing companies

To ensure that the necessary qualifications are in place when a vulnerability scan is performed, the testing company and its employees must meet the requirements of this section.

### 2.2.1 Requirements for testing companies

Testing companies must obtain at least one of the following accreditation/approvals:

- CREST Accredited Vulnerability Scanning.
- Approved Scanning Vendor (ASV).

CREST accreditation is carried out by the CREST membership body.

ASV approval is carried out by the Payment Card Industry (PCI) Security Standards Council (SSC).

Documentation of the testing company's CREST accreditation or ASV approval shall be attached to the standard report. Alternatively, the accreditation or approval can be linked in the standard report.

### **2.2.2 Requirements for staff organising the vulnerability scan**

The vulnerability scan shall be organised by suitably qualified persons. The testing company must therefore recruit and train suitably qualified, competent and experienced personnel. It is expected that the staff who organise the vulnerability scan have at least 5 years of practical experience with vulnerability scanning of systems and have a personal certification that demonstrates competence for vulnerability scanning. It may be one of the following:

- Certified ASV employee.
- CREST CPSA or CRT certification.

### **2.2.3 Supervision, assessment and signing of the standard report**

The organisation/execution of the vulnerability scan must be supervised in accordance with the requirements for supervision in section 2.3 of the general requirements. In addition, the result of the vulnerability scan and the need for possible derivative corrections of vulnerabilities must be assessed. It is the supervisor's responsibility to assess the result of the vulnerability scan and sign the standard

report, thereby guaranteeing that the vulnerability scan has been carried out professionally.

*Guideline: A person who supervises, assesses and signs, can at the same time organise the vulnerability scan in accordance with the requirements of section 2.3 on supervision in SCP.00.00 General requirements.*



# Vulnerability Scanning Framework

3

## 3.1 Purpose of vulnerability scanning

In vulnerability scanning, the testing company must identify weaknesses in the licence holder's or game supplier's technical infrastructure that could potentially be exploited for unauthorised intrusion via external interfaces.

## 3.2 Protected components

Base platform, gambling platform and business systems in the production environment must be protected against any attacks from unauthorised persons. In particular, components containing sensitive information about customers shall be protected. The definition of components and their materiality must be seen in connection with the Danish Gambling Authority's programme for managing system changes SCP.06.00.DK, section 3.3.3.

By segmenting their internal networks, including which parts of the system communicate via public networks with sensitive information, licence holders and game suppliers can reduce the risk of unauthorised access.

### 3.2.1 Updating software and hardware

It is the responsibility of the licence holder and the game supplier that the components of the systems are updated to a level that provides the highest possible security and does not compromise the integrity of the systems, thereby reducing the risk of unauthorised access to e.g. sensitive information.

If there is an update of essential components that are part of the external interfaces, there may be a need to scan for vulnerabilities to ensure the integrity of the system. What is considered 'essential components' depends on the set-up of a given environment and cannot therefore be defined in advance by the Danish Gambling Authority. Which components are considered to be significant can be seen in the context of section 3.3.3 of the Change Management Programme.

*Guideline: The Danish Gambling Authority does not specify what type of vulnerability scans the licence holder performs in this situation. In*

*this situation, if a vulnerability scan is performed in accordance with the requirements of this document, it can be considered a valid vulnerability scan and reported to the Danish Gambling Authority. The Danish Gambling Authority points out that vulnerability scans reported to us must include the entire licence holder's base platform and business systems or the entire game supplier's gambling platform and business systems.*

# Vulnerability Scanning Process

4

The scanning, the reporting to the licence holder and game supplier and the quality control, etc. must be in accordance with the requirements under PCI DSS or the requirements under CREST.

## 4.1 Vulnerability scan type

At intervals of no more than three months, the licence holder must have performed a 'PCI ASV Vulnerability Scan' or a 'vulnerability scan in accordance with CREST requirements' on their base platform and business systems.

At intervals of no more than three months, the game supplier must have performed a 'PCI ASV Vulnerability Scan' or a 'vulnerability scan in accordance with the requirements of CREST' on their gambling platform and business systems.

Vulnerability scanning must be organised and carried out by a testing company that meets the requirements of section 2.2. Depending on the testing company's delivery model, the scan may be initiated by staff of the licence holder or game supplier.

*Guideline: 'Base platform', 'gambling platform' and 'business system' are defined in the general requirements and include both frontend, backend, data warehouse and games.*

## 4.2 Vulnerabilities assessment

The testing company may use the National Vulnerability Database – Common Vulnerability Scoring System (NVD CVSS) scale or a similar scoring system to assess whether the licence holder's or game supplier's systems have a satisfactory level of security.

If individual sub-elements of the licence holder's or game supplier's vulnerability scan score 4 or higher on the NVD CVSS scale, the licence holder or game supplier must correct the uncovered vulnerabilities in the systems and be scanned again.

## 4.3 Standard report and plan for “fail” vulnerability scan

The standard report shall indicate whether the vulnerability scan has 'passed', 'passed with corrections' or 'not passed'.

'Passed' shall be used when the vulnerability scan has been carried out without any vulnerabilities having been found.

'Pass with corrections' shall be used when the vulnerability scan has shown vulnerabilities as described in section 4.2 that have been fixed and a subsequent re-scan has shown that the vulnerabilities are no longer present.

'Not passed' shall be used if there are vulnerabilities, cf. section 4.2, that cannot be rectified before the deadline for submitting the report to the Danish Gambling Authority expires. In this situation, an annex must be submitted with the standard report containing a vulnerability

remediation plan and a description of compensatory checks. These vulnerabilities need to be fixed before the next scan.

In practice, a 'failure' report cannot be accepted by the Danish Gambling Authority without the annex containing a plan for rectification and description of compensatory checks.

If a full vulnerability scan (re-scan) of the licence holder's base platform and business systems or game supplier's

gambling platform and business systems after rectification of vulnerabilities, the date of the re-scan may be the starting point for setting the deadline for the next required vulnerability scan.







The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Change Management Programme -  
SCP.06.00.DK.3.0

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# Purpose of the system change management programme

1

The system change management programme shall ensure that all changes made to the base platform and game platform are handled in accordance with these standards in order to ensure the quality level of implementation of changes. The programme will help to ensure increased transparency in relation to changes in the gambling system and the decision-making processes that have been formed the basis.

## 1.1 Version

Version 1.0 of 2014.07.01

- New structure compared to the previous version 1.3, as well as a number of updates in a number of areas. Therefore, a new version 1.0 is issued. The intention in the future is to follow normal version numbering.

Version 1.1 of 2015.12.21

- Corrections made in relation to the implementation of requirements for lotteries in the certification programme.

Version 1.2 of 2020.01.01

- The Danish Gambling Authority has removed the requirement that the testing company's accreditation must refer to a specific version, cf. section 2.2.

Version 2.0 of 2023.01.01

- Update of requirements for accredited test companies and staff. Quarterly reporting requirements have been removed. Detailed description of situations in which the Danish Gambling Authority must give prior approval of new and changed games is no longer available. In addition, general adjustments and specifications have been made.

Version 2.1 of 2023.10.01

- Updated visual layout of the document. A few linguistic corrections. No changes to requirements.

Version 3.0 of 2025.01.01

- Updated due to introduction of supplier licences for online casinos and betting. The document has been updated to take into account the licence holder's and game supplier's obligations in relation to system changes. The term 'gambling system' has been changed to the terms 'base platform' and 'gambling platform' where deemed necessary. Game suppliers no longer need to seek authorisation from the licence holder prior to a system change.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority publishes, if necessary, guidelines for a transitional scheme and the validity of already completed certifications.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

The system change management programme applies to the supply and provision of online and land-based betting (§ 11 of the Gambling Act), the provision of online casinos (§ 18 of the Gambling Act) and the supply of games (§ 24a of the Gambling Act).

# Frequency and testing companies

2

## 2.1 Frequency of certification

The licence holder and game supplier are responsible for ensuring that certification is carried out in accordance with the requirements of this document at intervals of no more than 12 calendar months.

### 2.1.1 First certification

Licence holders and game suppliers must be certified for the first time before a licence for gambling can be issued, unless the Danish Gambling Authority has stated otherwise. See section 2.1.3 of the General Requirements for further details.

### 2.1.2 Re-certification

The licence holder and game supplier must as a rule have undertaken a new certification within 12 months from the latest certification. The standard report shall state when the latest re-certification was performed.

The standard report documenting the re-certification must be received by the Danish Gambling Authority no later than two months after the certification has been made.

### 2.1.3 Postponement of recertification

The licence holder and game supplier may postpone certification up to two months from the time when a new certification should have been made. The new certification must be completed no later than 14 months from the latest certification and the standard report must be received by the Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be informed before the certification is postponed.

The deadline for re-certification shall be shortened by the time the previous 12-month deadline has been postponed. For example, if the maximum two months of postponement is used, the next certification must be renewed after 10 months. The timing of the next certification shall reflect this in the standard report.

## 2.2 Accredited testing companies

In order to ensure that the necessary qualifications are present when a certification is carried out, the testing company and its employees must meet the requirements of this section.

### 2.2.1 Requirements for testing companies

Certification of the system change management programme shall be carried out as accredited certification by a certification body accredited to ISO/IEC 17021-1 or ISO/IEC 17065 for certification under the Danish Gambling Authority's Certification Programme

SCP.03.00.DK by DANAK (the Danish Accreditation Fund) or an equivalent accreditation body which is a signatory to the EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition with regard to certification of management systems or by certification bodies outside EA's territory by an accreditation body which is a signatory to the relevant multilateral agreement on mutual recognition under the IAF's (International Accreditation Forum).



Documentation of the testing company's accreditation shall be attached to the certification report. Alternatively, a link to the accreditation in the certification report can be provided.

### **2.2.2 Requirements for personnel carrying out the certification work**

The certification work shall be carried out by personnel suitably qualified in accordance with the requirements of section 7 of ISO/IEC 17021-1 or section 6 of ISO/IEC 17065. The accredited testing company must therefore recruit and train suitably qualified, competent and experienced personnel.

### **2.2.3 Supervision and signing of the standard report**

The performance of the certification work shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General Requirements. It is the supervisor's responsibility to sign the standard report and thereby guarantee that the certification has been carried out professionally.

# System change management framework

# 3

The overall framework for managing system changes sets out the basis necessary prior to the implementation of a system change management programme. This means that the licence holder and the game supplier must:

- assign powers and responsibilities for the management of system changes;
- establish a formal change plan to set out the overall framework for managing system changes;
- record and classify the components of the gambling system for the purposes of configuration management;
- record changes in a change register; and
- establish a configuration starting point for the entire gambling system.

When classifying the components, it may be relevant to assess the differences in the content and type of games, as well as the different risks associated with them.

## 3.1 Responsibility for managing system changes

### **3.1.1 Responsibilities of the licence holder for the management of system changes**

The licence holder is responsible for changes to the base platform, irrespective of whether those changes have been made by the licence holder or by a third party at the request of the licence holder.

The licence holder shall clarify and describe the responsibilities and powers in relation to the implementation and approval of the change process.

If the system changes are controlled by a subcontractor of the licence holder, the licence holder must ensure that the subcontractor complies with the requirements of this document.

### **3.1.2 Game supplier's responsibility for managing system changes**

The game supplier is responsible for any changes to the gaming platform.

The game supplier must clarify and describe the responsibilities and powers in connection with the implementation and approval of the change process.

### **3.1.3 Responsible staff of licence holder and game supplier**

The licence holder and game supplier must appoint one or more employees in the company who are responsible overall for system changes. This can be organised as a committee.

The responsible employee(s) must have sufficient professional competence and experience in the management of system changes, as well as have the necessary decision-making power in the company to decide whether a change should be implemented.

The responsible employee(s) must ensure that relevant employees of the licence holder, game supplier or the relevant subcontractor are involved so that decisions are made on an informed basis.

Prior to the approval of a system change, the responsible staff member(s) shall confirm that:

- the proposed system change can be carried out in accordance with the Danish Gambling Authority's certification programme;
- the proposed system change is necessary;
- the system change is documented and categorised;

- the consequences of the implementation of the system change do not compromise the integrity of the gambling system; and
- the process for the planned actions for the implementation of the system change in documents, hardware and/or software is in accordance with section 4 of this document.

This, as well as who has participated in the decision-making process, must be listed in the change register, cf. section 3.4.

## 3.2 System Change Management Plan (Change Plan)

The management of system changes by the licence holder and game supplier shall be described in a formal change plan, which shall set out the overall framework for managing system changes.

The change plan of the licence holder shall:

- be documented;
- be approved by the Executive Board;
- be subject to adequate internal control;
- identify which procedure is used for configuration management as set out in section 3.3;
- assign responsibilities and describe the powers of the licence holder's employees in connection with changes to the gambling system and its components, and ensure that the expected life cycle of the component is described;
- be integrated with the formal change plans of any subcontractors;
- determine the division of responsibilities between the licence holder and any subcontractors; and
- as far as possible, always refer to the relevant procedures of the licence holder and any subcontractors.

## 3.3 Configuration management

Licence holder and game supplier must have configuration management that provides an overview of the base and game platform, respectively, by identifying the individual components. Once the individual components of the platforms have been registered and classified in the component registry as set out in section 3.3.2, a configuration starting point as set out in section 3.5 is created, ensuring the possibility to identify changes in future certifications.

This configuration management is intended to complement existing configuration management at the licence holder and game supplier.

If configuration management of the licence holder's base platform and of the gambling provider's game platform does not already take place, this document shall be considered as a minimum requirement for configuration management.

### 3.3.1 System structure and component definition of the base and game platform

The system structure of the base and game platform consists of the defined hardware and software components, as well as their interconnections and dependencies.

The components shall be defined in a component registry as specified in section 3.3.2 on the basis of whether their functional and physical properties can be individually controlled.

This definition shall be based on:

- legal requirements;
- materiality in relation to the risks to confidentiality, integrity, availability and traceability referred to in section 3.3.3;
- new or changed technology, design or development; and

- interface to other components.

The goal of defining the components is to optimise the possibility of a controlled development process for base and game platform. The definition of components shall be initiated as early as possible in the life cycle of the component and shall be continuously reassessed in line with the development of the component.

### **3.3.2 Registration of components in a register of components**

Licence holders and game suppliers must register all defined components in a component register.

The level of detail of this register is determined by the licence holder and game supplier. If the level of detail is very low – e.g. if the base or game platform is the only component – any change to the component will have to be subject to a high degree of management and control. A higher level of detail allows the degree of control and control to be differentiated according to the materiality of each component.

The following information about the component shall be recorded:

- definition of the component;
- unique identification number;
- version number;
- identifying characteristics;
- the owner responsible for changes to the component;
- confidentiality, integrity, availability and traceability classification according to section 3.3.3;
- checksum/hash value for components classified 3 (significant relevance), see section 3.3.3; and
- the geographical location in the case of hardware components.

The information shall be the basis for the accredited testing facility to inspect whether the component has changed from the configuration starting point as specified in section 3.5.

### **3.3.3 Classification of components**

All defined components shall be classified according to the following four criteria:

- Confidentiality: confidential information about customers (e.g. identification or transaction information).
- Integrity: the integrity of the game system itself, its functions, and the information stored in the game system.
- Availability: the availability of information about the customer.
- Traceability: the activity of users (both customers, employees and third parties) in relation to the component.

Based on the relevance of the components in relation to creating or securing the criteria above, a relevance code is assigned within each of the four criteria on the scale below:

1. no relevance (the component cannot have a negative impact on the criterion);
2. any relevance (the component may have an impact on the criterion); and



3. significant relevance (the criterion depends on the component).

The highest relevance code within the four criteria defines the classification of the component.

### **3.3.4 Classification of hardware components in virtual servers (cloud)**

If the licence holder or game supplier uses a virtual server environment, this may affect the classification as described in section 3.3.3.

#### **3.3.4.1 Own virtual server environment**

In situations where a licence holder or game supplier uses its own virtual server environment to support the base or game platform respectively, the hardware supporting the virtual server environment shall have sufficient redundancy and capacity to ensure continued operation in the event of failure of individual hardware components to ensure continuous and undisturbed operation of the platform until the failure is rectified. In this situation, the individual hardware components can be classified with a lower relevance code, cf. section 3.3.3.

In situations where the total physical hardware under the virtualisation layer does not have sufficient redundancy and capacity to accommodate errors on the individual hardware components and thus cannot ensure continuous and undisturbed operation of the platform until the error is rectified, the individual hardware components shall be classified with a higher relevance code, cf. section 3.3.3.

#### **3.3.4.2 Public virtual server environment**

In situations where a licence holder or game supplier uses a public virtual server environment (public cloud), hardware components of the server environment shall not be classified under section 3.3.3 when the public cloud owner meets the following conditions:

- The owner must not be part of the licence holder's or game supplier's business or otherwise connected to the licence holder's or game supplier's business.
- Is certified according to ISO/IEC 27001.
- The hardware supporting the virtual server environment shall have sufficient redundancy and capability to ensure continued operation in the event of failure of individual hardware components to ensure continuous and undisturbed operation of the gambling system until the failure is rectified.

## **3.4 Registration of changes in a change register**

All changes made to the betting system must be recorded and dated in a change register. This register shall provide the basis for the accredited testing facility to inspect the changes made to each component in relation to the configuration starting point as specified in section 3.5.

## **3.5 Base or game platform configuration starting point**

In connection with the initial certification of the licence holder's base platform or game supplier's gambling platform, the configuration starting point shall be determined as the certified platform in its completeness.

The configuration baseline allows the accredited testing company to inspect all changes to the components in such a way that the annual re-certification provides an audit trail back from the configuration baseline.

The annual certification shall establish a new configuration starting point to serve as the basis for system changes in the following year.

# System change management process

4

All system changes shall be subject to formal control. The degree of control will depend on how the change is expected to affect the betting system.

The process for managing a system change shall be documented in the change register referred to in section 3.4 and shall include the following:

- a description of the change;
- a categorisation of the change in terms of complexity, resource needs and planning;
- a justification for the change as set out in section 4.1;
- an evaluation of the change as set out in section 4.2;
- a description of how the change is to be approved as set out in section 4.3; and
- a description of how the change is to be implemented and verified, as set out in section 4.4.

## 4.1 Reason for change

Prior to the formal approval of a system change as set out in section 3.1.2, the change shall be justified and documented in the change register as set out in section 3.4.

The change proposal shall contain the following information:

- the component(s) and related documentation to be modified, including the unique identification number, version number and status;
- a description of the proposed change;
- a list of other components and related documentation that may be affected by the change;
- the employee or subcontractor who drafted the change and the date on which it was drawn up;
- the reasons for the change; and
- the category of change.

The status of the change process, related decisions and dispositions must be documented on an ongoing basis.

## 4.2 Evaluation of the change

A formal evaluation of the change must be carried out and documented in the change register, cf. section 3.4. This must be done on the basis of a risk assessment based on the purpose of the Danish Gambling Act and related Orders. The risk assessment shall be based on 'ISO/IEC 31010 Risk management – Risk assessment techniques'.

The evaluation of the change shall include:

- the expected impact of the change;
- a description of the risks associated with the change;
- a description of the impact of the change on the legal compliance of the licence holder or game supplier; and
- how the change affects the confidentiality, integrity, availability and traceability of the gambling system, as set out in section 3.3.3.

## 4.3 Change approval

An approval process must be established to ensure that all amendments and related evaluations of amendments are submitted to the responsible staff member(s) referred to in section 3.1.3 who make the final decision on whether or not to approve a given system change.

All decisions on system changes, as well as the underlying considerations, must be listed in the change register, cf. section 3.4.

The game supplier is responsible for the gambling platform. It is therefore not necessary for the game supplier to seek approval from the licence holder before making system changes to the gambling platform.

*Guideline: It is expected that licence holders and game suppliers will bilaterally agree on the cases in which there may be a need for the licence holder's involvement in connection with system changes to the gambling platform. In addition, attention is drawn to section 4.5, which concerns special requirements for business processes in relation to integration between base and gambling platform.*

#### **4.3.1 Particular details for licence holder and base platform**

The following subsection applies only to the licence holder. See also section 2.2 of the General Requirements on Base Platform Providers of the Licence Holder.

4.3.1.1 Approval of changes to the base platform recommended by a platform supplier When a system change to the base platform is initiated on the basis of a subcontractor's recommendation, the platform supplier's reasons for change, cf. section 4.1 and evaluation of amendments, cf. section 4.2, may be used as a basis for the approval of the change by the licence holder. In this context, a separate evaluation of the change must be made in relation to how the change in question will affect the overall betting system.

The time between the platform provider's recommendations and implementation shall be justified in the change register referred to in section 3.4. Documentation for the implementation of the platform provider's recommendations shall also be included in the change register.

4.3.1.2 Rejection of changes recommended by a subcontractor

If the licence holder refuses the implementation of a system change to a base platform recommended by a platform provider, this must be justified in the change register, cf. section 3.4.

The testing company shall consider the merits of each decision not to follow the platform provider's recommendations.

## **4.4 Implementation and verification of system changes**

This section applies to changes to components classified with relevance code 2 or 3 on the basis of section 3.3.3. Components classified with Relevance Code 1 are by their nature not relevant to the criteria in section 3.3.3 and therefore do not require approval of the change by the testing company.

After the implementation of a system change, the consistency between the approved system change and the actual

implementation shall be verified. This verification shall be recorded in the Change Register referred to in section 3.4.

#### **4.4.1 Changes to components classified with Relevance Code 3**

The testing company shall assess and approve the change evaluation, as described in section 4.2, for all changes to components classified with Relevance Code 3 ('Essential Relevance') according to section 3.3.3.

The testing company must certify all changes during or immediately after implementation.



The testing company may allow the certification to be postponed if the licence holder or game provider has an internal function whose primary purpose is to ensure the quality of the management of system changes. The function shall be staffed by qualified personnel and be organisationally separate from the function implementing system changes.

If the certification is postponed, the testing company assesses, approves and certifies the changes every three months.

The possibility of deferring certification to every third month can only be used by licence holders and game suppliers. It cannot be used by subcontractors to the licence holder's base platform without an independent licence in Denmark.

#### **4.4.2 Changes to components classified with Relevance Code 2**

The testing company shall assess and approve the change evaluation referred to in section 4.2 for all changes to base platform or gambling platform components classified with relevance code 2 ('some relevance') pursuant to section 3.3.3 and subject to SCP.02.00 Base platform requirements or SCP.07.XX Gambling requirements.

The testing company must certify these changes every twelve months.

### **4.5 Particular details in the field of integration**

If a system change includes integration between a base platform and a gambling platform, e.g. when a licence holder adds games from a new or existing game supplier, it is the licence holder's and the game supplier's responsibility to ensure that the base platform and the gambling platform respectively function correctly after integration.

This means that the responsible staff, cf. section 3.1.3 of the licence holder and the game supplier, must establish a business process with the aim of ensuring that e.g. sanity checks and samples of compliance with the requirements of SCP.02 (licence holder) and SCP.07 (game supplier) are carried out. Documentation of the actions is recorded in e.g. the change register, cf. section 3.4, or otherwise, so that the actions can be related to the specific system change.

The business process may be established as a collaboration between the licence holder and its game supplier(s).

If relevant in relation to a given system change, the testing company may, in connection with the verification referred to in sections 4.4.2 and 4.4.3, request to see the licence holder's or game supplier's documentation of actions taken in relation to the above.

In connection with the annual certification of the licence holder's and game supplier's programme for managing system changes, the testing company must assess and approve the established business process.

**Reports from the  
component register and  
the change register, etc.**

**5**

At the request of the Danish Gambling Authority or the testing company, the licence holder and the game supplier must be able to form the following reports on the basis of the information in, inter alia, the component register, cf. section 3.3.2, the change register, cf. section 3.4, verified changes, cf. section 4.4, and integration checks, cf. section 4.5:

- a report of all components, including the recorded information from the register of components;
- a report with the change history of each component;
- a report with the geographical location of all hardware components; and
- a report of all verified system changes, as referred to in section 4.4. This report should be available for a limited period, e.g. three months, six months, 12 months, etc.

- A report with system changes in accordance with section 4.5, including the actions taken to ensure the correct functioning of the base platform and gambling platform after integration.

# The Danish Gambling Authority's prior approval of system changes

6

Licence holders and game suppliers are obliged to notify the Danish Gambling Authority immediately when suspicions or findings arise. This means, among other things, that when errors occur in, for example, a game provided by the game supplier and offered by the licence holder, the Danish Gambling Authority must be notified.

Licence holders and game suppliers are also obliged to notify the Danish Gambling Authority when there are significant changes to the conditions on which the licence has been obtained. In some cases, it requires the approval of the Danish Gambling Authority before a change can be made.

## 6.1 Random Number Generator

Implementation of a new Random Number Generator (RNG), as well as all changes to the existing RNG, must be notified to the Danish Gambling Authority at least five working days before the implementation or change takes place.

## 6.2 New games and changes in existing offer of games

In connection with the implementation of new games or changes to existing offers of games, there may be a need for approval by the Danish Gambling Authority before the new games are implemented or

changed. This is partly because it must be ensured that the data reporting for the games is carried out correctly.

It is clear from the technical requirements for online casinos and betting, which can be found on the Danish Gambling Authority's website, when the licence holder must notify and have approval from the Danish Gambling Authority.







The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Requirements for gambling - Online betting -  
SCP.07.01.DK.1.0

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# Purpose of gaming requirements

1

Requirements for games must ensure that games and the gambling platform contain features that support a number of essential considerations in the Gambling Act by, among other things, setting requirements for the game's conduct and presentation.

This document contains both test and inspection requirements. It is clear from the individual requirement whether the requirement should be tested. These requirements are marked with: **[TEST]**. If this marking is not provided, the requirement shall be inspected. Please note that there are different requirements for the accreditation of testing companies depending on whether the requirement is to be tested or inspected (see 2.2.1. Requirements for testing companies).

## 1.1 Version

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version and version history are available on the Danish Gambling Authority's website.

Version 1.0 of 2025.01.01

- First version of 'Game requirements: online betting' The document contains game-specific requirements that have been moved from the previous testing and inspection standards.

When publishing a new version of the certification programme, the Danish Gambling Authority publishes, if necessary, guidelines for a transitional scheme and the validity of tests and inspections already carried out.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

This document applies to the provision of online betting services (§ 24a of the Gambling Act) to gambling providers authorised to provide online betting services in Denmark. The document also applies if a licence holder provides online betting for his own betting offer (§ 11 of the Gambling Act).

# Frequency and testing companies

2

## 2.1 Frequency of certification

Game suppliers and licence holders providing their own games are responsible for certification in accordance with the requirements of this document at intervals of no more than 12 calendar months.

### 2.1.1 First test and inspection of games and upload of game certificate

Online betting must be certified before the game can be offered on the Danish market.

As documentation of the initial certification, the standard report for SCP.07.01 shall be used. The standard report is a game certificate and may include one or more games. The game certificate must state which games are covered by it.

Information about the game and the associated gambling certificate must be uploaded to the Danish Gambling Authority's gambling portal before the game can be offered on the Danish market. See instructions on uploading on the Danish Gambling Authority's website.

### 2.1.2 Retesting and inspecting games and uploading game certificate

Online betting must in principle be re-certified within 12 months of the latest certification. The standard report shall indicate when tests and inspections have been renewed.

If it can be documented that no changes have been made to the game since the previous test and inspection, the testing company can certify the standard report without further testing or inspection being necessary. Documentation that there have been no changes can, for example, be a comparison of hash values generated by the testing company or by the use of validation software.

If there have been changes to the game since the previous test and inspection, re-certification of SCP.07.01 may be based on sampling and compliance with the requirements of the document 'SCP.06 - System Change Management Programme'.

As documentation of the re-certification, the standard report to SCP.07.01 shall be used. The standard report is a game certificate and may include one or more games. The game certificate must state which games are covered by it.

The gambling certificate, which documents the re-certification, must be uploaded to the Danish Gambling Authority's gambling portal, and thereby be received by the Danish Gambling Authority, no later than one month after the test and inspection has been carried out. See instructions on uploading on the Danish Gambling Authority's website.

### 2.1.3 Postponement of re-inspection

Game suppliers and licence holders who offer their own games may delay testing and inspection for up to one month from the time when a



new test and inspection should have been carried out. The new test and inspection must be completed no later than 13 months from the latest test and inspection and the standard report must be received by the Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be informed before testing and inspection is postponed.

The period for the renewal of testing and inspection shall be shortened by the time the previous 12-month period has been postponed. For example, if one takes advantage of the maximum one-month delay, the next test and inspection must be renewed after 11 months. The timing of the next test and inspection shall reflect this in the standard report.

## 2.2 Accredited testing companies

In order to ensure that the necessary qualifications are available when tests and inspections are carried out, the testing company and its personnel shall comply with the requirements of this Section.

### 2.2.1 Requirements for testing companies

Testing of gambling and gambling platform must be carried out as accredited testing by a laboratory that is accredited according to ISO/IEC 17025 or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.07.01.DK. It is clear from the individual requirements whether they should be tested. Testing refers to whether the function in question is working as intended. These requirements are marked with: **[TEST]**.

Inspection of gambling and the gambling platform must be carried out as an accredited inspection by an inspection body that is accredited as a type A body according to ISO/IEC 17020 for inspection or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.07.01.DK.

Accreditation must be carried out by DANAK (the Danish Accreditation Fund) or an equivalent accreditation body that is a signatory to EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition for testing and inspection or, for inspection bodies outside EA's territory, by an accreditation body that is a signatory to ILAC's (the International Laboratory Accreditation Cooperation) multilateral agreement on mutual recognition for testing and inspection.

Links to documentation of the testing company's accreditation are stated in the game certificate.

### 2.2.2 Requirements for personnel carrying out tests and inspections

Testing and inspection shall be carried out by personnel suitably qualified in accordance with the requirements of section 6 of ISO/IEC 17025, section 6 of ISO/IEC 17020 or section 6 of ISO/IEC 17065. The

accredited testing company must therefore recruit and train suitably qualified, competent and experienced personnel.

### **2.2.3 Supervision and signing of the standard report (game certificate)**

The performance of tests and inspections shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General Requirements. It is the supervisor's responsibility to sign the game certificate and thereby guarantee that the test and inspection has been carried out professionally.

**Written presentation**

**3**

## 3.1 Information, game rules and instructions

### 3.1.1 General

1	All written information, game rules and instructions must be accurate and unambiguous.
2	Written information, game rules and instructions must be in English and be both grammatically and syntactically correct.  Guideline: This does not preclude translation into other languages.
3	The basic language is Danish (if several languages are used). Exemption If games are offered in Greenland, the basic language must be Greenlandic.
4	All written information, game rules and instructions must be the same in all language versions and must be displayed in the language chosen by the customer.

### 3.1.2 Game rules and instructions

1	All games must have associated game rules and instructions for all aspects of the game.
2	The gambling system must ensure that the rules and instructions (including restrictions on games and how the customer plays) are easily accessible from all gambling sites
3	Game rules and instructions must be available to the customer through the same medium and on the same device as used for the conduct of the game.
4	Game rules and instructions must be available without wagering.
5	Game rules and instructions must be available throughout the course of the entire game.
6	Game rules must contain satisfactory information concerning all functions whereby the chances of winning and the size of winnings in the game in question are

## 3.2 Bets and winnings

### 3.2.1 Information on bets and winnings

1	The game platform must display the game bet unit or the currency of the game.
2	The game platform must show the customer's possible bet, actual bet and any conversion from currency to game betting units.
3	The game platform must show the customer's possible winnings.
4	The game platform must show the maximum bet of the game.
5	The game platform must display the game's minimum bet.

# Visual presentation

4

## 4.1 Graphics

### 41.1.1 General

1	The game platform shall ensure that the balance of the gambling account is displayed or easily accessible from all gambling pages.
2	The gambling platform must show the customer what they are depositing, including the game bet unit and the total game bet.

### 41.1.2 Results

1	The betting platform must display the result of the bet in a clear and explicit manner.
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# General game features

5



## 5.1 Game play

### 5.1.1 General

1	Bets must be settled at all times in accordance with the applicable rules of the game.
2	The betting platform must ensure that the player makes an active choice to place a bet.  Guideline: Customers may not be forced to place a bet just by clicking on an outcome in
3	The gambling system must ensure that all instructions deriving from the customer's actions are subject to informed consent.  Guideline: Repeated clicks on an action button, e.g. 'buy bets', must not be queued, so that the player buys the bet several times. The customer must be given a reasonable amount of time to be aware of the consequences of the customer's action.

### 5.1.2 The game's use of RNG

1	<b>[TEST]</b> Result generation in games with an element of randomness shall be based on a certified Random Number Generator (RNG) and associated functionality (seeding, mapping, mixing, etc.)  Guideline: Result generation for online bets is only allowed in connection with a trend
2	<b>[TEST]</b> Functions that are not result generating but have an element of randomness shall be based on a certified Random Number Generator (RNG) and associated functionality (seeding, mapping, mixing, etc.)
3	<b>[TEST]</b> When RNG output is received, the output shall be used in the order in which it is received
4	<b>[TEST]</b> The game system shall ensure traceability between the RNG extraction and the in-game event.  Guideline: The licence holder must be able to verify that the results from the RNG are the
5	<b>[TEST]</b> Random outcomes must not be influenced or controlled by anything other than numerical values produced in an approved manner by the verified RNG combined with
6	<b>[TEST]</b> RNG output shall be secured until it is used.  Guideline: RNG output must not be transmitted unencrypted between RNG server and
7	<b>[TEST]</b> RNG output mapped to a symbol or event must be used immediately and in accordance with the rules of the game.

### 5.1.3 Play without a stake

1	The gambling platform shall ensure that bets without stake are only offered with the same pricing (odds) as an equivalent bet offered with stake.
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# Special game features

6

## 6.1 Betting

### 6.1.1 General

1	The gambling platform must keep a current log of all bets purchased by a player under a licence issued by the Danish Gambling Authority.
2	As a minimum, the log (see section 6.1.1.1) must include: <ul style="list-style-type: none"> <li>• date and time;</li> <li>• possible outcomes;</li> <li>• the customer's stake;</li> <li>• the odds offered by the licence holder at the time of purchase; and</li> <li>• the result.</li> </ul>
3	The gambling platform must prepare analyses and reports aimed at detecting match-fixing.

### 6.1.2 Closing of bets

1	It must be clear to the player which amount the player will win if the player chooses to close their bet before the bet is settled.
2	If a partial closing of a bet is offered, the player must be informed of the winnings, the amount of deposit the player still has on the bet and the potential winnings on the

## 6.2 Betting exchange

### 6.2.1 General

1	The betting platform must keep a log of all participants on the betting exchange
2	The log, as referred to in 6.2.1.1, shall remain within the supplier's gambling platform.
3	The betting platform must be able to uniquely identify all customers on the betting exchange.
4	The gambling platform must take measures to prevent the customer from playing against themselves

### 6.2.2 Rules and information

1	The rules and conditions described in section 3.1 also apply to betting exchanges.
2	The rules and conditions must include a ban on the customer playing against themselves, irrespective of whether or not it is through the same provider.
3	The rules and conditions must prohibit collusion, etc.
4	The rules and conditions must deal with the management of interruptions to games in progress
5	It must be clearly stated in the rules of the game if commission/fees are charged and by what amount/percentage of the bet.  Guideline: Commission is an amount that the player pays to use the betting exchange.

### 6.2.3 Surveillance

1	The gambling platform must have technical methods to continuously (real time) detect suspicious conditions
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2	The gambling platform must be able to analyse suspicious events and on this basis form reports
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# Control of game functions

7

## 7.1 General

### 7.1.1 Game activation and deactivation

1	<b>[TEST]</b> The gambling platform must have a feature that can disable the ability to place a bet on a specific event.
2	<b>[TEST]</b> The gambling platform must have a feature that can disable the ability to place bets on all events.
3	Information on activation and deactivation must be saved in a log.

### 7.1.2 Error handling

1	The gambling platform must immediately detect any faults in the system. The cause and solution are recorded when these are known.
2	The gambling platform shall be able to form a report on the basis of data collected pursuant to 7.1.2.1.





The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Requirements for games - Land-based betting -  
SCP.07.02.DK.1.0



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# Purpose of gaming requirements

1

Requirements for games must ensure that games and the gambling platform contain features that support a number of essential considerations in the Gambling Act by, among other things, setting requirements for the game's conduct and presentation.

This document contains both test and inspection requirements. It is clear from the individual requirement whether the requirement should be tested. These requirements are marked with: **[TEST]**. If this marking is not provided, the requirement shall be inspected. Please note that there are different requirements for accreditation to test companies depending on whether the requirement is to be tested or inspected (see 2.2.1. Requirements for testing companies).

## 1.1 Version

Version 1.0 of 2025.01.01

- First version of 'Game requirements: Land-based betting'. The document contains game-specific requirements, which have been moved from the previous testing and inspection standards.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority publishes, if necessary, guidelines for a transitional scheme and the validity of tests and inspections already carried out.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

This document applies to the provision of land-based betting services (§ 24a of the Gambling Act) to gambling providers authorised to

provide land-based betting services in Denmark. The document also applies if a licence holder provides land-based betting for its own gambling offer (§ 11 of the Gambling Act).

# Frequency and testing companies

# 2

## 2.1 Frequency of certification

Game suppliers and licence holders providing their own games are responsible for ensuring that certification takes place at intervals of no more than 12 calendar months in accordance with the requirements of this document.

### 2.1.1 First test and inspection and upload of game certificate

Land-based bets must be certified before the game can be offered on the Danish market.

As documentation of the initial certification, the standard report for SCP.07.02 shall be used. The standard report is a game certificate and may include one or more games. The game certificate must state which games are covered by it.

Information about the game and the associated gambling certificate must be uploaded to the Danish Gambling Authority's gambling portal before the game can be offered on the Danish market. See instructions on uploading on the Danish Gambling Authority's website.

### 2.1.2 Re-testing and inspection and uploading game certificate

Land-based betting must normally be re-certified within 12 months of the latest certification. The standard report shall indicate when tests and inspections have been renewed.

If it can be documented that no changes have been made to the game since the previous test and inspection, the testing company can certify the standard report without further testing or inspection being necessary. Documentation that there have been no changes can, for example, be a comparison of hash values generated by the testing company or by the use of validation software.

If there have been changes to the game since the previous test and inspection, re-certification of SCP.07.02 may be based on sampling and compliance with the requirements of the document 'SCP.06 - System Change Management Programme'.

As documentation of the re-certification, the standard report to SCP.07.02 shall be used. The standard report is a game certificate and may include one or more games. The game certificate must state which games are covered by it.

The gambling certificate, which documents the re-certification, must be uploaded to the Danish Gambling Authority's gambling portal, and thereby be received by the Danish Gambling Authority, no later than one month after the test and inspection has been carried out. See instructions on uploading on the Danish Gambling Authority's website.

### 2.1.3 Postponement of re-inspection

Game suppliers and licence holders who offer their own games may delay testing and inspection for up to one month from the time when a

new test and inspection should have been carried out. The new test and inspection must be completed no later than 13 months from the latest test and inspection and the standard report must be received by the Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be informed before testing and inspection is postponed.

The period for the renewal of testing and inspection shall be shortened by the time the previous 12-month period has been postponed. For example, if one takes advantage of the maximum one-month delay, the next test and inspection must be renewed after 11 months. The timing of the next test and inspection shall reflect this in the standard report.

## 2.2 Accredited testing companies

In order to ensure that the necessary qualifications are available when tests and inspections are carried out, the testing company and its personnel shall comply with the requirements of this Section.

### 2.2.1 Requirements for testing companies

Testing of gambling and gambling platform must be carried out as accredited testing by a laboratory that is accredited according to ISO/IEC 17025 or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.07.02.DK. It is clear from the individual requirements whether they should be tested. Testing refers to whether the function in question is working as intended. These requirements are marked with: **[TEST]**.

Inspection of gambling and the gambling platform must be carried out as an accredited inspection by an inspection body that is accredited as a type A body according to ISO/IEC 17020 for inspection or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.07.02.DK.

Accreditation must be carried out by DANAK (the Danish Accreditation Fund) or an equivalent accreditation body that is a signatory to EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition for testing and inspection or, for inspection bodies outside EA's territory, by an accreditation body that is a signatory to ILAC's (the International Laboratory Accreditation Cooperation) multilateral agreement on mutual recognition for testing and inspection.

Links to documentation of the testing company's accreditation are stated in the game certificate.

### 2.2.2 Requirements for personnel carrying out tests and inspections

Testing and inspection shall be carried out by personnel suitably qualified in accordance with the requirements of section 6 of ISO/IEC 17025, section 6 of ISO/IEC 17020 or section 6 of ISO/IEC 17065. The



accredited testing company must therefore recruit and train suitably qualified, competent and experienced personnel.

### **2.2.3 Supervision and signing of the standard report (game certificate)**

The performance of tests and inspections shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General Requirements. It is the supervisor's responsibility to sign the game certificate and thereby guarantee that the test and inspection has been carried out professionally.

**Written presentation**

**3**

## 3.1 Information, game rules and instructions

### 3.1.1 General

1	All written information, game rules and instructions must be accurate and unambiguous.
2	Written information, game rules and instructions must be in English and be both grammatically and syntactically correct.  Guideline: This does not preclude translation into other languages.
3	The basic language is Danish (if several languages are used). Exemption If games are offered in Greenland, the basic language must be Greenlandic.
4	All written information, game rules and instructions must be the same in all language versions and must be displayed in the language chosen by the customer.

### 3.1.2 Game rules and instructions

1	All games must have associated game rules and instructions for all aspects of the game.  Guideline: In relation to 'all aspects', it must, for example, generally be stated what the consequences for loss of communication to the game are. 'All aspects' must thus
2	The gambling system must ensure that the rules and instructions (including restrictions on games and how the customer plays) are easily accessible from all gambling sites
3	Game rules and instructions must be available to the customer through the same medium and on the same device as used for the conduct of the game.
4	Game rules and instructions must be available without wagering.
5	Game rules and instructions must be available throughout the course of the entire game.
6	Game rules must contain satisfactory information concerning all functions whereby the chances of winning and the size of winnings in the game in question are
7	Game rules and instructions must not change during the course of the game.
8	It must be stated in the game rules what happens to the customer's bet if a game is still unfinished after 90 days.

## 3.2 Bets and winnings

### 3.2.1 Information on bets and winnings

1	The game platform must display the game bet unit or the currency of the game.
2	The game platform must show the customer's possible bet, actual bet and any conversion from currency to game betting units.
3	The game platform must show the maximum bet of the game.
4	The game platform must display the game's minimum bet.

## 3.3 Reimbursement shares

### 3.3.1 General

1	The gambling platform must inform the customer about the theoretical return share using an optimal gambling strategy and it must be clearly apparent which elements of the game are not part of an optimal gambling strategy. The information must be
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	Guideline: Where a progressive prize is offered, this must be done in such a way as to ensure that the theoretical minimum repayment rate is presented to the customer
2	<b>[TEST]</b> The theoretical repayment percentage stated in the rules of the game must be correct
3	<b>[TEST]</b> The repayment percentage shall not be manipulated.

# Visual presentation

4

## 4.1 Graphics

### 41.1.1 General

1	The gambling platform shall ensure that the balance of the gambling account is displayed or easily accessible on the terminal.
2	The gambling platform must ensure that the name of the game is visible to the customer in all contexts.
3	The gambling platform must show the customer what they are depositing, including the game bet unit and the total game bet.

### 41.1.2 Results

1	The game platform must display the outcome of the game in a clear and explicit manner.
2	The game platform must display the result of the game for an appropriate period of time so that the player has time to be informed about the outcome and the result.
3	The gambling platform must display winnings in a clear and explicit manner.

# General game features

5

## 5.1 Game play

### 5.1.1 General

1	Games must be played at all times in accordance with the applicable rules of the game.
2	<b>[TEST]</b> The betting platform must ensure that the player makes an active choice to place a bet.
3	<p><b>[TEST]</b> The gambling platform shall ensure that all actions derived from the customer's choice are carried out with informed consent.</p> <p>Guideline: Repeated clicks on an action button, e.g. 'buy bets', must not be queued, so that the player buys the bet several times. The customer must be given a reasonable amount of time to be aware of the consequences of the customer's action.</p>

### 5.1.2 The game's use of RNG

1	<b>[TEST]</b> Result generation in games with an element of randomness shall be based on a certified Random Number Generator (RNG) and associated functionality (seeding,
2	<b>[TEST]</b> Functions that are not result generating but have an element of randomness shall be based on a certified Random Number Generator (RNG) and associated functionality (seeding, mapping, mixing, etc.)
3	<p><b>[TEST]</b> When RNG output is received, e.g. when a game asks the RNG for a series of case numbers, the output must be used in the order it is received.</p> <p>Guideline: RNG output must not be overridden by adaptive behaviour, which prohibits automatic or manual intervention that alters the probability of a given result while the</p>
4	<p><b>[TEST]</b> The game system shall ensure traceability between the RNG extraction and the in-game event.</p> <p>Guideline: The licence holder must be able to verify that the results from the RNG are the</p>
5	<b>[TEST]</b> If the rules of the game require a series or a mapping of units or events to be set up in advance (e.g. the location of hidden objects within a maze), units or events may not be reordered or remapped unless specified in the game rules.
6	<p><b>[TEST]</b> Random outcomes must not be influenced or controlled by anything other than numerical values produced in an approved manner by the verified RNG combined with the rules of the game.</p> <p>Guideline: This does not exclude games that change their nature temporarily during the course of the game, or jackpots decided by other aspects than mere game results, from being permitted.</p>
7	<p><b>[TEST]</b> RNG output shall be secured until it is used.</p> <p>Guideline: RNG output must not be transmitted unencrypted between RNG server and</p>
8	<p><b>[TEST]</b> RNG output mapped to a symbol or event must be used immediately and in accordance with the rules of the game.</p> <p>Guideline: This does not prevent games that temporarily change their nature during the course of the game from unfolding in accordance with the rules of the game in question. This also does not prevent that the visual presentation of, for example, numbers drawn in a bingo game is delayed or that more RNG output has been drawn than the game</p>

### 5.1.3 Play without a stake

1	<b>[TEST]</b> Games without wagering (free games, games for fun, trial games, etc.) must be conducted by an RNG that is certified according to the requirements of this document and has the same game logic as when the game is wagered.
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	Guideline: Thus, play without wagering must not give the impression that the chance of winning is greater than it is actually in play with wagering.
2	The gambling platform shall ensure that bets without stake are only offered with the same pricing (odds) as an equivalent bet offered with stake.

#### 5.1.4 Proper presentation of randomness

1	<b>[TEST]</b> All game events must be presented correctly.  Guideline: Concepts such as a constructed 'near-miss' are not considered to be the
2	<b>[TEST]</b> Gambling must give a true and fair view of the extent to which a customer can influence the outcome. Guideline: The customer must not be given the impression that the result can be affected if this is not
3	<b>[TEST]</b> The gambling platform shall ensure that all events presented as being based on random outcomes are equally likely to produce a given outcome each time the event occurs.  Guideline: This probability must be the one the player is immediately given the impression of in the user interface (e.g. by the visual expression). The exception to this is if the user interface also clearly indicates that you have to look elsewhere for the real probabilities.
4	<b>[TEST]</b> Games involving the simulation of a physical unit (roulette reels, playing cards, reels of slot machines, etc.) must give true and fair results in accordance with the expectation of this physical unit.  Guideline: If a game is presented as a direct or indirect simulation of a physical entity,

# Special game features

6

## 6.1 Betting

### 6.1.1 General

1	The gambling platform must keep a current log of all bets purchased by a player under a licence issued by the Danish Gambling Authority.
2	As a minimum, the log (see section 6.1.1.1) must include: <ul style="list-style-type: none"> <li>• date and time;</li> <li>• possible outcomes;</li> <li>• the customer's stake;</li> <li>• the odds offered by the licence holder at the time of purchase; and</li> <li>• the result.</li> </ul>
3	The gambling platform must be able to produce analyses and reports aimed at detecting match-fixing.

### 6.1.2 Closing of bets

1	It must be clear to the player which amount the player will win if the player chooses to close their bet before the bet is settled.
2	If a partial closing of a bet is offered, the player must be informed of the winnings, the amount of deposit the player still has on the bet and the potential winnings on the

# Control of game functions

7

## 7.1 General

### 7.1.1 Game activation and deactivation

1	<b>[TEST]</b> The gambling platform must have a feature that can disable the ability to place a bet on a specific event.
2	<b>[TEST]</b> The gambling platform must have a feature that can disable the ability to place bets on all events.
3	Information on activation and deactivation must be saved in a log.
4	<b>[TEST]</b> When a game is disabled, the customer must be able to complete ongoing games.

### 7.1.2 Unfinished games

1	<p><b>[TEST]</b> If a game is unfinished, the game must be able to be resumed where the game was interrupted.</p> <p>Guideline: Unfinished games include: (a) loss of communication; (b) rebooting of</p>
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### 7.1.3 Error handling

1	The gambling platform must immediately detect any faults in the system. The cause and solution are recorded when these are known.
2	The gambling platform shall be able to form a report on the basis of data collected pursuant to 7.1.3.1.





The Danish Gambling Authority

# The Danish Gambling Authority's certification programme for betting and online casinos



Requirements for games: Online casino -  
SCP.07.03.DK.1.0

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# Purpose of gaming requirements

1

Requirements for games must ensure that games and the gambling platform contain features that support a number of essential considerations in the Gambling Act by, among other things, setting requirements for the game's conduct and presentation.

This document contains both test and inspection requirements. It is clear from the individual requirement whether the requirement should be tested. These requirements are marked with: **[TEST]**. If this marking is not provided, the requirement shall be inspected. Please note that there are different requirements for accreditation to test companies depending on whether the requirement is to be tested or inspected (see 2.2.1. Requirements for testing companies).

## 1.1 Version

Version 1.0 of 2025.01.01

- First version of 'Game requirements: Online casinos The document contains game-specific requirements that have been moved from the previous testing and inspection standards.

The Danish Gambling Authority regularly reviews the certification programme for betting and online casinos. The latest version is available on the Danish Gambling Authority's website.

When publishing a new version of the certification programme, the Danish Gambling Authority publishes, if necessary, guidelines for a transitional scheme and the validity of tests and inspections already carried out.

It should be pointed out that it is the Danish version that is binding. The English version is for guidance only.

## 1.2 Scope

This document applies to the supply of online casino games (§ 2 4a of the Gambling Act) to gambling providers authorised to provide online casinos in Denmark. The document also applies if a licence holder supplies online casino games for its own gambling offer (§ 18 of the Gambling Act).

For online bingo offered via television, the following requirements of this document do not apply:

- Section 3: 3.1.2.2, 3.1.2.3, 3.2
- Section 4: 4.1.1, 4.1.4, 4.1.5, 4.1.6, 4.1.7
- Section 6: 6.1, 6.2, 6.3.4, 6.4.1.5, 6.4.1.10, 6.4.1.12
- Section 7: 7.1.2, 7.1.3, 7.1.4.2

# Frequency and testing companies

2

## 2.1 Frequency of certification

Game suppliers and licence holders providing their own games are responsible for ensuring that certification takes place at intervals of no more than 12 calendar months in accordance with the requirements of this document.

### 2.1.1 First test and inspection and upload of game certificate

Online casino games must be certified before the game can be offered on the Danish market.

As documentation of the initial certification, the standard report for SCP.07.03 shall be used. The standard report is a game certificate and may include one or more games. The game certificate must state which games are covered by it.

Information about the game and the associated gambling certificate must be uploaded to the Danish Gambling Authority's gambling portal before the game can be offered on the Danish market. See instructions on uploading on the Danish Gambling Authority's website.

### 2.1.2 Re-testing and inspection and uploading game certificate

Online casino games must normally be re-certified within 12 months of the latest certification. The standard report shall indicate when tests and inspections have been renewed.

If it can be documented that no changes have been made to the game since the previous test and inspection, the testing company can certify the standard report without further testing or inspection being necessary. Documentation that there have been no changes can, for example, be a comparison of hash values generated by the testing company or by the use of validation software.

If there have been changes to the game since the previous test and inspection, re-certification of SCP.07.03 may be based on sampling and compliance with the requirements of the document 'SCP.06 - System Change Management Programme'.

As documentation of the re-certification, the standard report to SCP.07.03 shall be used. The standard report is a game certificate and may include one or more games. The game certificate must state which games are covered by it.

The gambling certificate, which documents the re-certification, must be uploaded to the Danish Gambling Authority's gambling portal, and thereby be received by the Danish Gambling Authority, no later than one month after the test and inspection has been carried out. See instructions on uploading on the Danish Gambling Authority's website.

### 2.1.3 Postponement of re-inspection

Game suppliers and licence holders who offer their own games may delay testing and inspection for up to one month from the time when a new test and inspection should have been carried out. The new test and inspection must be completed no later than 13 months from the latest test and inspection and the standard report must be received by the Danish Gambling Authority within the same deadline.

The Danish Gambling Authority must be informed before testing and inspection is postponed.

The period for the renewal of testing and inspection shall be shortened by the time the previous 12-month period has been postponed. For example, if you take advantage of the maximum one-month delay, the next

test and inspections are renewed after 11 months. The timing of the next test and inspection shall reflect this in the standard report.

## 2.2 Accredited testing companies

In order to ensure that the necessary qualifications are available when tests and inspections are carried out, the testing company and its personnel shall comply with the requirements of this Section.

### 2.2.1 Requirements for testing companies

Testing of gambling and gambling platform must be carried out as accredited testing by a laboratory that is accredited according to ISO/IEC 17025 or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.07.03.DK. It is clear from the individual requirements whether they should be tested. Testing refers to whether the function in question is working as intended. These requirements are marked with: **[TEST]**.

Inspection of gambling and the gambling platform must be carried out as an accredited inspection by an inspection body that is accredited as a type A body according to ISO/IEC 17020 for inspection or ISO/IEC 17065 according to the Danish Gambling Authority's certification programme SCP.07.03.DK.

Accreditation must be carried out by DANAK (the Danish Accreditation Fund) or an equivalent accreditation body that is a signatory to EA's (European co-operation for Accreditation) multilateral agreement on mutual recognition for testing and inspection or, for inspection bodies outside EA's territory, by an accreditation body that is a signatory to ILAC's (the International Laboratory Accreditation Cooperation) multilateral agreement on mutual recognition for testing and inspection.

Links to documentation of the testing company's accreditation are stated in the game certificate.

### 2.2.2 Requirements for personnel carrying out tests and inspections

Testing and inspection shall be carried out by personnel suitably qualified in accordance with the requirements of section 6 of ISO/IEC 17025, section 6 of ISO/IEC 17020 or section 6 of ISO/IEC 17065. The accredited testing company must therefore recruit and train suitably qualified, competent and experienced personnel.



### **2.2.3 Supervision and signing of the standard report (game certificate)**

The performance of tests and inspections shall be supervised in accordance with the requirements for supervision set out in section 2.3 of the General Requirements. It is the supervisor's responsibility to sign the game certificate and thereby guarantee that the test and inspection has been carried out professionally.

**Written presentation**

**3**

## 3.1 Information, game rules and instructions

### 3.1.1 General

1	All written information, game rules and instructions must be accurate and unambiguous.
2	Written information, game rules and instructions must be in English and be both grammatically and syntactically correct.  Guideline: This does not preclude translation into other languages.
3	The basic language is Danish (if several languages are used).  Exemption If games are offered in Greenland, the basic language must be Greenlandic.
4	All written information, game rules and instructions must be the same in all language versions and must be displayed in the language chosen by the customer.

### 3.1.2 Game rules and instructions

1	All games must have associated game rules and instructions for all aspects of the game.  Guideline: In relation to 'all aspects', it should be stated, for example, in general what the consequences for loss of communication to the game are, and in the rules for card games it should be stated, for example, how often the cards are shuffled. 'All aspects' must thus
2	The gambling system must ensure that the rules and instructions (including restrictions on games and how the customer plays) are easily accessible from all gambling sites
3	Game rules and instructions must be available to the customer through the same medium and on the same device as used for the conduct of the game.
4	Game rules and instructions must be available without wagering.
5	Game rules and instructions must be available throughout the course of the entire game.  Guideline: Game instructions must be visible and easily accessible in all contexts.
6	Game rules must contain satisfactory information concerning all functions whereby the chances of winning and the size of winnings in the game in question are increased.
7	Game rules and instructions must not change during the course of the game.
8	It must be stated in the game rules what happens to the customer's bet if a game is still unfinished after 90 days

## 3.2 Bets and winnings

### 3.2.1 Information on bets and winnings

1	The game platform must display the game bet unit or the currency of the game.
2	The game platform must show the customer's possible bet, actual bet and any conversion from currency to game bet.
3	The gambling platform shall display and describe all possible winnings and combinations of winnings, as well as the maximum possible win per bet unit.
4	The game platform must show the maximum bet of the game.
5	The game platform must display the game's minimum bet.

### 3.3 Reimbursement shares

#### 3.3.1 General

1	<p>The gambling platform must inform the customer about the theoretical return share using an optimal gambling strategy and it must be clearly apparent which elements of the game are not part of an optimal gambling strategy. The information must be available in the game rules for each game.</p> <p>Guideline: Where a progressive prize is offered, this must be done in such a way as to</p>
2	<p><b>[TEST]</b> The theoretical repayment percentage stated in the rules of the game must be correct</p>
3	<p><b>[TEST]</b> The repayment percentage shall not be manipulated.</p> <p>Guideline: Thus, there must be no form of intervention whatsoever to maintain a constant refund share to the player. This does not preclude the presentation of the game from being adapted on the basis of specific choices made by the player.</p>
4	<p>If deposits are made for a jackpot in connection with a game, the impact of the jackpot must be taken into account when disclosing the refund percentage.</p>

# Visual presentation

4

## 4.1 Graphics

### 4.1.1 General

1	The gambling platform must ensure that the name of the game is visible to the customer in all contexts related to the individual game. Guideline: The name of the game can appear in the title bar of the window or tab in which the game is played.
2	The game platform shall ensure that the balance of the gambling account is displayed or easily accessible from all gambling pages.
3	The gambling platform must show the customer what they are depositing, including the
4	In games with interactive betting options (e.g. roulette, blackjack, etc.), the illustrations must unambiguously show the type and value of all bets, as well as provide the ability to
5	If a game temporarily changes character so that it differs significantly from the base game, the game must indicate the current status.  Guideline: The deviation from the base game can be a feature and/or bonus game. It must therefore be clear to the player when there is a transition between the base game and feature/bonus game.

### 4.1.2 Results

1	The game platform must display the outcome of the game in a clear and explicit manner.
2	The game platform must display the result of the game for an appropriate period of time so that the player has time to be informed about the outcome and the result.
3	The gambling platform must display winnings in a clear and explicit manner.

### 4.1.3 Symbols

1	A symbol must consistently have the same shape and colour in the game in question, unless animation is used.
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### 4.1.4 Slot machines

1	The game should clearly show: <ul style="list-style-type: none"> <li>• how many lines the player has chosen,</li> <li>• the game bet unit chosen by the player per line; and</li> <li>• the total bet per game (number of lines x bet per line).</li> </ul>
2	The game must ensure that wins for each symbol or symbol combination are placed in an area that visually belongs to the symbol.  Guideline: If some symbols have the same scale of winnings, they should be placed in an area that corresponds visually to that scale of winnings.
3	The game must ensure that the number of symbols that trigger a win is specified.  Guideline: It is sufficient that these are set out in the rules/instructions of the game.  Guideline: If winnings can be obtained for different symbol combinations, the illustration should clearly indicate the combinations.

### 4.1.5 Card games.

1	The face of the playing card must clearly show value and suit.
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2	The game must graphically/in writing show the number of decks in use if more than one deck of cards is used.
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**4.1.6 Roulette**

1	<p>The wheel in roulette must have 36 squares with the numbers from 1 to 36, as well as one square with the indication 0 (37 squares in total) and possibly one square with the indication 00 (38 squares in total). The distribution of the numbers shall be identical to that of a standard roulette turntable.</p> <p>Guideline: The permitted roulette games are often referred to as 'European roulette'</p>
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**4.1.7 Dice**

1	<p>Dice shown as traditional dice must have 6 sides, where there are 1-6 dots per side and the sum of opposite sides is 7. In the case of non-traditional dice, this must be clear and evident to the customer and the design of the dice must be described, e.g. in the rules of the game.</p> <p>Guideline: Online casino games where dice make up the main game may not be offered. For example, dice can occur in feature games.</p>
2	It must be clear which side of the dice determines the game.

**4.1.8 Online bingo**

1	The gambling platform shall have a sequential list clearly showing all numbers/symbols drawn.
---	---

# General game features

5



## 5.1 Game play

### 5.1.1 General

1	Games must be played out at all times in accordance with the applicable rules of the game.
2	<b>[TEST]</b> The game must ensure that the player makes an active choice to start a game before the game begins. Guideline: Customers may not be forced to play a game just by selecting it from the menu.
3	<b>[TEST]</b> The gambling platform shall ensure that all actions derived from the customer's choice are carried out with informed consent.  Guideline: An action where the customer 'clicks' on action images; such as 'play', 'hold', 'drag', 'double', <u>etc. is</u> only applicable when the customer has had reasonable time to learn about the consequences of the customer's action (e.g. repeated clicks on an action button may not be queued and settled subsequently).
4	<b>[TEST]</b> Games must be carried out independently of the customer's equipment and/or communication channel.  Guideline: The gambling logic must therefore be carried out in the gambling platform and not on the player's equipment, which means, among other things, that the gambling
5	<b>[TEST]</b> The gambling platform shall ensure that at least 3 seconds elapse between each settlement of a given game.  Guideline: Settlement should be understood as the entire process from the start of the game until the result is presented to the customer, e.g. from when 'spin' is pressed on a slot machine to the presentation of the result.

### 5.1.2 The game's use of RNG

1	<b>[TEST]</b> Result generation in games with an element of randomness shall be based on a certified Random Number Generator (RNG) and associated functionality (seeding,
2	<b>[TEST]</b> Functions that are not result generating but have an element of randomness shall be based on a certified Random Number Generator (RNG) and associated functionality (seeding, mapping, mixing, etc.)  Guideline: This could be, for example, the player's seat at a poker table in a
3	<b>[TEST]</b> When RNG output is received, e.g. when a game asks the RNG for a series of case numbers, the output must be used in the order it is received.  Guideline: RNG output must not be overridden by adaptive behaviour, which prohibits automatic or manual intervention that alters the probability of a given result while the
4	<b>[TEST]</b> The game system shall ensure traceability between the RNG extraction and the in-game event.  Guideline: The licence holder must be able to verify that the results from the RNG are the
5	<b>[TEST]</b> If the rules of the game require a series or a mapping of units or events to be set up in advance (e.g. the location of hidden objects within a maze), units or events may not be reordered or remapped unless specified in the game rules.
6	<b>[TEST]</b> Random outcomes must not be influenced or controlled by anything other than numerical values produced in an approved manner by the verified RNG combined with the rules of the game.  Guideline: This does not exclude games that change their nature temporarily during the course of the game, or jackpots decided by other aspects than mere game results, from being permitted.
7	<b>[TEST]</b> RNG output shall be secured until it is used.  Guideline: RNG output must not be transmitted unencrypted between RNG server and

8	<p><b>[TEST]</b> RNG output mapped to a symbol or event must be used immediately and in accordance with the rules of the game.</p> <p>Guideline: This does not prevent games that temporarily change their nature during the course of the game from unfolding in accordance with the rules of the game in question. This also does not prevent that the visual presentation of, for example, numbers drawn in a bingo game is delayed or that more RNG output has been drawn than the game</p>
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**5.1.3 Play without a stake**

1	<p><b>[TEST]</b> Games without wagering (free games, games for fun, trial games, etc.) must be conducted by an RNG that is certified according to the requirements of this document and has the same game logic as when the game is wagered.</p> <p>Guideline: Thus, play without wagering must not give the impression that the chance of winning is greater than it is actually in play with wagering.</p>
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**5.1.4 Proper presentation of randomness**

1	<p><b>[TEST]</b> All game events must be presented correctly.</p> <p>Guideline: Concepts such as a constructed ‘near-miss’ are not considered to be the correct presentation of a gambling event.</p>
2	<p><b>[TEST]</b> Gambling must give a true and fair view of the extent to which a customer can influence the outcome. Guideline: The customer must not be given the impression that the</p>
3	<p><b>[TEST]</b> The gambling platform shall ensure that all events presented as being based on random outcomes are equally likely to produce a given outcome each time the event occurs.</p> <p>Guideline: This probability must be the one the player is immediately given the impression of in the user interface (e.g. by the visual expression). The exception to this is if the user interface also clearly indicates that you have to look elsewhere for the real probabilities.</p>
4	<p><b>[TEST]</b> Games involving the simulation of a physical unit (roulette reels, playing cards, reels of slot machines, etc.) must give true and fair results in accordance with the expectation of this physical unit.</p> <p>Guideline: If a game is presented as a direct or indirect simulation of a physical entity, the</p>

# Special game features

6

## 6.1 Peer-to-peer games

### 6.1.1 General

1	The gambling platform must keep a log and a record of all participants in the licence
2	All participants who play against one of the licence holder's customers must be connected to a provider. Guideline: This does not prevent a given player from
3	The log, as mentioned in 6.1.1.1, must be kept within the licence holder's gambling
4	The gambling platform must take measures to prevent the customer from playing against
5	The gambling system must have methods to discover whether the same equipment is being used by one or more participants on the peer-to-peer system at the same time.
6	The gambling platform shall, as far as possible, limit the simultaneous use of the same equipment by one or more participants on the peer-to-peer system.

### 6.1.2 Rules and information

1	The rules and conditions described in section 3.1 also apply to peer-to-peer games.
2	The rules and conditions must include a ban on the customer playing against themselves, irrespective of whether or not it is through the same provider.
3	The rules and conditions must prohibit collusion, etc.
4	The rules and conditions must deal with the customer's use of add-ons ('bots', etc.) for the automation of games.
5	The rules and conditions must deal with the management of interruptions to games in progress.
6	It must be clear from the rules of the game if a commission is charged and at what amount/percentage of the bet.  Guideline: Commission is an amount that the player pays to participate in a game such as online bingo or poker (participant fee/rake) in addition to the stake for the game

### 6.1.3 Surveillance

1	The gambling platform must have technical methods to continuously (real time) detect suspicious conditions.
2	The gambling platform must be able to analyse suspicious events and on this basis form reports.
3	The gambling platform must have technical means to support the rules (6.1.2.4) for the customer's use of game automation add-ons.

## 6.2 Live casino games

### 6.2.1 General

1	Game symbols used in live casino games must be automatically detected by technology in the studio.
2	Game symbols used in live casino games must be reported to the gambling platform.
3	The game rules for live casino games must be programmed into the gambling platform.
4	The gambling platform must be able to analyse live casino games in order to identify irregularities and discrepancies, and on this basis form reports.

### 6.2.2 Customer interface

1	The terms and conditions set out in 3.1 also apply to live casino games.  Guideline: The terms and conditions relating to live casino games must have a particular focus on communication errors and asynchronous data streams as well as
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### 6.2.3 Video monitoring

1	The live casino gambling components of the gambling platform shall include video surveillance.
2	The video surveillance must be sufficient to prove compliance with the rules of the game and to identify discrepancies.
3	The date and time shall be indicated on the video surveillance. The time zone must either also be stated or it must be clear in the licence holder's own documentation.

### 6.2.4 Access control

1	There must be formal physical access control to the live casino games studio and associated facilities.
2	Access control (6.2.4.1) must differentiate between persons with job functions such as dealer, pit boss, managers and monitoring to ensure that only relevant staff have access

### 6.2.5 Gambling technology equipment

1	<b>[TEST]</b> The probability of winning on each number on the roulette wheel must be equal
2	<b>[TEST]</b> Roulette wheels used exclusively for live casino must be certified with an interval of at most 1 year. Roulette wheels used from a land-based casino must be certified with an interval of at most 2 years. Guideline: The testing company assesses which tests are sufficient to ensure the probability.
3	<b>[TEST]</b> The card mixer must be designed so that it can eradicate any pattern(s) introduced to the playing cards before they are placed in the mixer that will affect the
4	<b>[TEST]</b> The function of the card mixer shall not be disrupted or interrupted (except by interruption of the current) without detection.
5	<b>[TEST]</b> During normal operation, the card mixer must be able to shuffle and dispense the playing cards without leaving marks or damage on the cards allowing the player
6	<b>[TEST]</b> The card mixer must not provide information to the player that makes it possible to: <ul style="list-style-type: none"> <li>• predict the outcome of a game.</li> <li>• track the cards played and the cards to be played.</li> <li>• analyse the probability of an occurrence in the game.</li> <li>• analyse the strategy of the given game situation.</li> </ul>
7	<b>[TEST]</b> Mechanisms and controls shall be in place to prevent tampering with any card inserted in the card shoe.
8	<b>[TEST]</b> The shoe shall be designed to facilitate the issuing of cards without revealing the
9	<b>[TEST]</b> The shoe must have a cover that hides the back of the cards in the shoe. The back of the cards must be visible to the extent that it allows distribution from the
10	<b>[TEST]</b> The shoe must not leave any marks on the cards that could allow the outcome of a game to be predicted.
11	<b>[TEST]</b> The card shoe must not contain hidden compartments.  Guideline: This could be a hidden space for storing additional cards, which is considered to pose a security risk.

## 6.3 Jackpots

### 6.3.1 General

1	<b>[TEST]</b> The gambling platform must ensure that the actual funds transferred to a jackpot pool are consistent with what is stated in the rules for that jackpot.  Guideline: If there is a cap on a jackpot, once the cap is reached, all additional contributions must be credited to another pot.
2	<b>[TEST]</b> The gambling platform shall ensure that the refund share is in line with what the customer has been promised, regardless of the gambling bet unit.
3	<b>[TEST]</b> If there is a minimum bet for a customer to trigger a jackpot, the base game (excl. jackpot) shall have the stated payback share.
4	<b>[TEST]</b> The gambling platform shall ensure that all customers contributing to a jackpot pool have the opportunity to win the jackpot while playing that particular game.
5	<b>[TEST]</b> The gambling platform must ensure that the probability of winning the jackpot is linearly proportional to the customer's contribution to the pot per game.

### 6.3.2 Rules

1	The rules for a given jackpot should describe how the customer can win it.
2	The rules for a given jackpot must state the probability of the customer winning it.  Guideline: It must be clearly stated to the player if the probability of winning a jackpot is not constant, e.g. if the probability changes over time.
3	The rules for a given jackpot must describe how it is financed and specify how the contributions to it are to be made.
4	The rules for a given jackpot must describe how prizes are determined and awarded.  Guideline: A given jackpot may be configured using 'split pools'. Split pools refer to schemes where part of the contributions to the jackpot are redirected to another pot, so that once the jackpot is won, that pot becomes the basis for the next jackpot (seed and re-seed).
5	The rules for a given jackpot must describe how the licence holder will deal with and resolve situations where one or more customers think they have won the same jackpot.
6	The rules for a given jackpot must describe how the licence holder can close a jackpot scheme as well as what happens to the funds in the jackpot pool if the jackpot scheme is

### 6.3.3 Jackpot setup

1	The gambling platform must enforce a strict access control for changing jackpot configurations. In particular, changes after start-up must be limited.
2	The gambling system must ensure that the default functionality maintains the configuration status of existing jackpot schemes if the configuration is changed, before the existing prizes are distributed.  Guideline: When a jackpot is started, the changes to the parameters must not take
3	The gambling platform shall ensure that jackpot configurations are not affected by the features to disable/activate the jackpot.  Guideline: 'Deactivation' should not be confused with 'closure'. Deactivation is a

### 6.3.4 Jackpot alert

1	The gambling platform must ensure that the current amount of the jackpot is displayed on all participating customers' equipment, unless the customer has actively opted out.
2	The gambling platform must update the jackpot amount on the client side with a maximum of 30-second intervals.
3	The gambling platform must ensure that the winner of a jackpot is notified immediately after the triggering of the jackpot.
4	The gambling system must inform all participating customers immediately after the jackpot is released, including stating its value.  Guideline: This also includes customers who have the game itself and/or the game page open without having contributed to the pool.

### 6.3.5 Jackpot triggering

1	The gambling platform shall maintain a detailed, complete and auditable log of all jackpot triggers
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### 6.3.6 Jackpot statement

1	The gambling system must keep a detailed, complete log that is suitable for audit and records the current jackpot status, including: <ul style="list-style-type: none"> <li>• date and time;</li> <li>• configuration;</li> <li>• contributions;</li> <li>• triggers;</li> <li>• winnings; and</li> <li>• access by authorised staff.</li> </ul>
2	The gambling platform must save jackpot status on redundant and fault-tolerant media (see 6.3.6.1)
3	The gambling platform must be able to recover jackpot amounts and jackpot prizes based on customer contributions to the jackpot pool.

### 6.3.7 Jackpot closure

1	The gambling platform must clearly indicate if a jackpot is not available to the customer.
2	The gambling platform shall ensure that all information on the theoretical refund share available to customers is correct regardless of whether the jackpot is available or not.

## 6.4 Online bingo

### 6.4.1 General

1	The gambling platform shall only allow online bingo to be offered as peer-to-peer games. Online bingo must therefore comply with the requirements set out in section 6.1.  Guideline: Online bingo can only be offered as pool games.
2	The gambling platform shall only allow online bingo with draws of either 75, 80 or 90 numbers/symbols
3	The gambling platform must ensure that a game board for online bingo with 75 numbers/symbols consists of 5 rows of 5 squares.
4	The gambling platform must ensure that a game board for online bingo with 80 numbers/symbols consists of 4 rows of 4 squares.
5	The gambling platform must ensure that a game board for online bingo with 90 numbers/symbols consists of 3 rows of 9 squares.
6	The gambling platform shall ensure that sales of game boards start no earlier than 30 minutes before the start of the game.

	Guideline: This does not apply to online bingo offered via TV.
7	The game platform must put game boards randomly together.
8	The gambling platform must not allow the customer to select numbers/symbols on game boards.  Guideline: This does not prevent the customer from choosing between game boards that
9	The gambling platform must not allow the customer to change numbers/symbols on game boards.
10	The gambling platform must allow the customer to manually mark the player's plate of drawn numbers/symbols. Guideline: The customer must be able to mark the drawn numbers/symbols himself, also called manual 'dupping'.  Guideline: The customer must be paid their winnings if the customer's numbers/symbols are drawn, even in situations where the customer has not marked correctly.
11	The gambling platform must allow automatic marking on the customer's board of drawn numbers/symbols.
12	The gambling platform must finish the game on the first fully marked game board.
13	The gambling platform shall ensure that the customer has the opportunity to view all game boards that were included in the game at the end of the game. It must be clearly stated on which game boards a prize was won.  Guideline: The customer must have the opportunity to see which game boards were included in the game and which game boards generated a prize. The information can be displayed directly on the screen, allowing the player to save or print it, or as a document that can be downloaded, for example, directly after the game, via the customer's game
14	<b>[TEST]</b> When conducting online bingo, the gambling platform must ensure that at least 3 seconds elapse between the drawing and/or visual presentation of each number/symbol.  Guideline: If numbers/symbols are drawn continuously during play, this must be done at least 3 seconds apart.

**6.4.2 Particular requirements for online bingo offered via TV**

1	The value of each prize must not exceed DKK 25,000. Guideline: This also applies to jackpots.
2	The total sales amount may not exceed DKK 200,000 per day.
3	A player's bet must not exceed 350 DKK per day.
4	The repayment rate shall not exceed 45 per cent.



# Control of game functions

7

## 7.1 General

### 7.1.1 Game flow

1	<p><b>[TEST]</b> A player may not be able to play the same game simultaneously on the gambling platform.</p> <p>Guideline: The player may play the same game type multiple times, but may not be able</p>
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### 7.1.2 Game activation and deactivation

1	<b>[TEST]</b> The gambling platform must have a feature that can disable a specific game immediately.
2	<b>[TEST]</b> The gambling platform must have a feature that can disable all games instantly.
3	Information on activation and deactivation must be saved in a log.
4	<b>[TEST]</b> When a game is disabled, the customer must be able to complete ongoing games.
5	<b>[TEST]</b> When a game that can be in multiple modes (e.g. a slot machine that has a feature game, where the game thereby changes state between the main game and the feature game) is disabled, customers must be able to continue from the current state when the game is again activated. This option may, however, lapse after a period of not

### 7.1.3 Unfinished games

1	<p><b>[TEST]</b> If a game is unfinished, the game must be able to be resumed where the game was interrupted.</p> <p>Guideline: Unfinished games include: (a) loss of communication, (b) system restart, (c) game disabled/enabled, (d) customer restarts, (e) abnormal termination of client programme</p> <p>Guideline: A situation where a customer loses the connection to a peer-to-peer game</p>
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### 7.1.4 Error handling

1	The gambling platform must immediately detect all defects in the games. The cause and solution are recorded when these are known.
2	The game supplier shall be able to form a report on the basis of data collected in accordance with 7.1.4.1.

