



RESOLUTION OF 6 OCTOBER 2014, FROM THE DIRECTORATE GENERAL FOR THE REGULATION OF GAMBLING, APPROVING THE REGULATION SETTING FORTH THE FORM AND CONTENT OF THE FINAL CERTIFICATION REPORT ON THE TECHNICAL SYSTEMS OF GAMBLING OPERATORS AND ELABORATES ON THE CHANGE MANAGEMENT PROCEDURE.

The Gambling Act 13/2011 of 27 May establishes the national and legislative framework for gambling activities in its different forms for the purposes of ensuring the protection of public order, combating fraud, preventing addictive behaviour, protecting the rights of minors and safeguarding the rights of gambling participants.

The Tenth additional provision of the Establishment of the National Markets and Competition Commission Act 3/2013 of 4 June, stipulates that "the Directorate General for the Regulation of Gambling, under the aegis of the Ministry of Finance and Public Administration, shall assume the purpose, functions and powers attributed by the Gambling Act 13/2011 of 27 May to the now defunct National Gambling Commission."

Article 16 of the Gambling Act 13/2011 of 27 May states that "businesses that organise, operate and carry out gambling regulated under the Gambling Act 13/2011 of 27 May must use duly authorised software, equipment, systems, terminals and devices that are generally necessary for the realisation of gambling activities". Said article also assigns the authorisation of the technical gambling systems, the establishment of specifications necessary for the functioning of such systems and the procedure for their certification to the Directorate General for the Regulation of Gambling.

Elsewhere, article 6.1 of Royal Decree 1613/2011 of 14 November, elaborating on the technical requirements of gambling activities under the Gambling Act 13/2011 of 27 May, states that, for carrying out authorisations, the Directorate



General for the Regulation of Gambling "may depend on the certification reports regarding the adequacy of the operator's technical gambling system, which have been issued by bodies appointed for such purposes." Furthermore, article 8.1 of the above-mentioned Royal Decree 1613/2011 stipulates that the Directorate General for the Regulation of Gambling shall establish the minimum content of the reports issued by bodies appointed for certifying technical gambling systems.

It should be further noted that Royal Decree 1613/2011, in its first final provision, assigns the development of technical aspects for the marketing of gambling activities covered by the Gambling Act 13/2011 of 27 May to the Directorate General for the Regulation of Gambling.

The purpose of this Resolution, issued on the basis of the mandate under article 8 of Royal Decree 1613/2011, is to establish the minimum content of the final certification reports issued by the appointed bodies, as well as the forms to be used by said bodies.

On the basis of the experience accumulated since publication of the original version on the form and content of the final certification report established under the Resolution of 12 July 2012 from the Directorate General for the Regulation of Gambling, the form and content of the version have been revised and updated.

By virtue thereof, and following the favourable report from the Office for Legal Counsel to the State Secretariat for Finance under the aegis of the Ministry of Finance and Public Administration, the Directorate General, through its conferred powers, hereby decides:



One.

To approve the regulation establishing the form and content of the final certification report on the technical gambling systems of licensed operators in Spain, which is contained in appendix I of this Resolution

Two.

To approve appendices II, III, IV, V, VI and VII of this Resolution.

Three.

This Resolution shall enter into force on the day following its publication in the Official State Gazette of Spain.

Four.

Requests for authorisation of those licences granted on the publication date of this Resolution may be accompanied by certification reports with the form and content stipulated in the Resolution of 12 July 2012.

Five.

To repeal the Resolution of 12 July 2012, from the Directorate General for the Regulation of Gambling, approving the regulation which establishes the form and content of the final certification report on the technical systems of gambling operators and elaborates on the change management procedure.

Pursuant to articles 114 and 115 of the Legal Regime Applicable to Public Authorities and the Common Administrative Procedure Act 30/1992 of 26 November, an interested party may lodge an administrative appeal against this resolution with the State Secretariat for Finance within one month from the day following publication of this resolution.



Madrid, 6 October 2014 – Director-General for the Regulation of Gambling,
Carlos Hernández Rivera.

Translated



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APPENDIX I

Regulation establishing the form and content of the final certification report on the technical systems of gambling operators and elaborating on the change management procedure.

One. *Purpose and scope.*

The purpose of this regulation is to establish the form and minimum content of the final certification report in relation to compliance with the requirements established under current regulations and applicable to the technical gambling systems used for carrying out and operating the gambling activities covered by the relevant general or specific licence.

The final certification report shall be issued by one or more entities appointed by the Directorate General for the Regulation of Gambling for such purposes. The objective of such a report will be the authorisation of the technical gambling systems of operators. There must be a report for each general or specific licence granted to the interested operator.

The final certification report, whose form and minimum content is established herein, extends to the certification of the technical gambling systems of operators holding general licences for carrying out and operating the forms of gambling referred to in paragraphs c), e) and f) of article 3 of the Gambling Act 13/2011 of 27 May and with regard to the types of gambling regulated prior to the publication date of the Act.

Moreover, this regulation elaborates on the change management procedure referred to in article 8.4 of Royal Decree 1613/2011 of 14 November, elaborating on the technical requirements of gambling activities under the Gambling Act 13/2011 of 27 May. It supplements the provisions contained in section 4.13 of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May.



Two. *Definitions.*

For the purposes of this regulation, the terms employed herein shall have the same meaning as established under section 1.2 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May.

Three. *Procedure and time frame for authorising technical gambling systems.*

Technical gambling systems shall be initially authorised within the framework of the procedure for granting general and specific licences.

The final certification report or reports for the technical gambling systems must be submitted by the interested party within a non-extendible period of four months from the day on which the party was notified of the granting of the general licence or provisional specific licence.

The final certification report is composed of the following documents:

- a) Description of the licensed technical system, completed by the operator.
- b) Final certification report of functionality.
- c) Final certification report on security.
- d) Report on the operator's compliance with regulations on personal data protection.

The authorisation procedure shall commence at the moment that the final certification report is logged in the General Register of the Ministry of Finance and Public Administration in the manner stipulated under article 38.4 of the Legal Regime Applicable to Public Authorities and the Common Administrative Procedure Act 30/1992 of 26 November. Procedures shall commence according to the order in which the reports are recorded.



The final certification report along with the additional documentation and reports must be submitted in a digital format. Only the identification of the certification, its objective and executive summary, duly signed by the authorised person or persons of the certification body, must be submitted in a hard copy.

If the operator submits the certification report via telematic methods, it must ensure that the certification report has been signed by means of a certificate acceptable to the Central State Administration, in accordance with the Citizens' Electronic Access to Public Services Act 11/2007 of 22 June and its supplementary regulations.

The Directorate General for the Regulation of Gambling may request from the interested parties all documentation and information it considers necessary for deciding on the authorisation procedure.

Having received the final certification report and assessed it favourably, the Directorate General for the Regulation of Gambling shall authorise the technical gambling systems in accordance with article 16 of the Gambling Act 13/2011 of 27 May within a period of six months from the notification date of the granting of the licence, without prejudice to the extension of said period due to the time spent by the interested party in dealing with any requirements stipulated by the Directorate General for the Regulation of Gambling subsequent to the submission of the final certification report.

Four. *Description of the licensed technical system.*

To describe the licensed technical system, the following documentation must be provided:

- An updated description of the technical system.
- In the case of specific licences, the particular rules.
- The operator's descriptive questionnaire.

The operator's descriptive questionnaire is a document prepared by the operator which includes information based on the operation of its business, gambling on offer, providers and contacts.



The content of the questionnaire, completed by the operator, must correspond to the content of the submitted final certification reports where particular aspects are shared. Otherwise, the operator must explain the differences in content.

Five. *Certification reports.*

The operator must submit a final certification report on the functionality of the technical gambling system and a final certification report on the security of the technical gambling system used for carrying out and operating the licensed gambling.

The final certification report in relation to the functionality of the technical gambling system must be issued by a body appointed, for certifying game software, by the Directorate General for the Regulation of Gambling

The final certification report on security must be issued by a body appointed, for certifying the security of information systems, by the Directorate General for the Regulation of Gambling.

The final certification reports must demonstrate that the technical system used by the operator for carrying out and operating the licensed gambling complies with the technical requirements stipulated under current gambling regulations. The reports must also express an opinion on the state of the technical gambling system as of the date of their submission.

The final certification reports to be provided by the operator following the granting of a general licence must cover the user registration, gambling account, management of payments and collections, internal control system and the various terminals or applications allowing access by participants.

The final certification reports to be provided by the operator following the provisional granting of a specific licence must cover the game software and, where applicable, the random number generator, internal control system and the various terminals or applications allowing access by participants.

The operator concerned may submit a certification report just once, regardless of whether it applies to the authorisation processes of one or more granted licences. In such a case, and following the original submission of the



certification report, it shall be sufficient to refer to its submission with the identification of the procedure for which it was submitted.

The report shall be written entirely in the Spanish language. Appendices, evidence or supporting documentation of the report may be recorded in Spanish or the original language in which they were written. In the latter case, the Directorate General for the Regulation of Gambling may require the operator to provide, within a period of ten days, a Spanish translation of any appendix or document originally provided in language other than Spanish.

Six. *Providers of gambling services.*

The technical gambling system used by the operator for carrying out and operating licensed gambling shall include the systems of all providers of gambling services that participate in the complete solution.

The applicant operator shall be accountable for authorising the entire technical gambling system and submitting final certification reports which must include the technical systems of all providers of gambling services.

Seven. *Certification report of functionality.*

The final certification report of functionality shall assess whether the technical gambling system, used by the operator for carrying out and operating the licensed gambling, complies with the technical requirements.

For general licences, a single report covering the entire scope shall be submitted.

For specific licences, several reports may be submitted when the software for the gambling or forms included in a report is entirely separate to the software for the gambling or forms in other reports. In any event, each report must demonstrate compliance with all technical requirements for the gambling and included forms, as well as the internal control system and integration with the gambling platform.

The form and minimum content of the final certification report of functionality is described in appendix III of the Resolution approving this regulation.



The final certification report of functionality shall consist of, at least, three sets of tests or analyses:

a) Assessment tests on compliance with technical requirements:

For assessing compliance with the technical requirements, the certification body may choose the test or tests considered most appropriate. The technical requirements are listed in appendix V of the Resolution approving this regulation.

The certification body that issues the report may conduct some of the tests referred to in an environment different from that actually used by the operator for carrying out and operating the licensed gambling; however, the issued certification must, in all cases, refer to the technical gambling system used by the operator. Where test environments differ from the environments actually used by the operator, the certification body must, under its own responsibility, certify that the results obtained in the test environment are comparable to the results that would have been obtained in testing the technical gambling system employed by the operator for realising and operating the licensed gambling. It must further certify that it has examined that any possible differences between the test environment and the actual technical gambling system do not affect the quality of the test results.

b) Specific analyses of relevant functionalities:

The certification body must perform a specific analysis on particular functionalities of significant relevance.

In the case of general licences, identity checks and the reasons behind individual gambling prohibitions shall be analysed and the measures for combating fraud and money laundering shall be assessed. In the case of specific licences, the game logic and, where applicable, the return percentage to the player and the random number generator shall be analysed.



c) Integration tests:

The certification body must devise and perform the necessary integration tests for proving the compliance of the used technical gambling system with the requirements.

In the case of the initial authorisation, integration tests must be conducted on the technical gambling system actually used by the operator for carrying out and operating the licensed gambling. They may not be conducted in any other environment.

For subsequent certifications, integration tests may be conducted, with respect to managing a substantial change, in an environment different to that of the technical gambling system actually used by the operator for carrying out and operating the licensed gambling. Where test environments differ from the environments actually used by the operator, the certification body must, under its own responsibility, certify that the results obtained in the test environment are comparable to the results that would have been obtained in testing the technical gambling system employed by the operator for realising and operating the licensed gambling. It must further certify that it has examined that any possible differences between the test environment and the actual technical gambling system do not affect the quality of the test results.

The set of integration tests must include, at a minimum, those tests described in appendix VI of the Resolution approving this regulation.

The purpose of integration tests is to analyse real data generated during the time the operator carries out and markets the gambling activity. These integration tests in relation to real data require the technical gambling system to have at least one month of data. They cannot be completed through tests or simulations. Should the operator not have commenced the gambling activity at the moment of submitting the final certification report, the report may be submitted without providing the results of the cited tests. However, the authorisation shall be conditional on the submission of the results of the tests and their favourable assessment by the Directorate General for the Regulation of Gambling. If the final certification report is submitted without the results of those tests analysing the real data generated during the realisation and



marketing of the gambling activity, said results must be submitted within three months of the commencement date of the relevant gambling activity.

The final certification report of functionality shall include a copy of the binary files of the certified software and a fingerprint of the critical components.

Eight. *Final certification reports on security.*

Security certification may be performed only on the technical gambling system employed by the operator for carrying out and operating the licensed gambling in relation to the security procedures, processes, arrangements and measures in effect.

The operator may request the certification body to issue a single certification report on security that covers the entire technical gambling system for the purposes of using said report in the authorisation processes of each licence granted to the operator.

Where one or more providers of gambling services form part of the technical gambling system used by the operator for developing and operating the gambling activity to be permitted by the relevant licence, the operator applying for the licence must submit a final certification report on the security of the technical infrastructure of each one of the providers.

The form and minimum content of said final certification report on security is contained in appendix IV of the Resolution approving this regulation.

The final certification report on security shall be composed of two parts. In the first part, the certification body shall accredit compliance with the security requirements listed in appendix VII of the Resolution approving this regulation. Partial endorsement of compliance with technical security requirements shall be possible where the system for security management subject to certification holds an ISO 27001 certificate that has an identical scope and is valid on the date of applying for authorisation. The security requirements that may benefit from this recognition are stated in the aforementioned appendix VII. The certification body must attach a copy of the ISO 27001 certificate which clearly states the recipient, the scope of the certificate and its period of validity.



In the second part, the certification body must perform specific audit analyses in relation to the list of critical components, change management, business continuity management and prevention of information loss.

Nine. *Compliance with the regulations on personal data protection.*

Together with the final certification report, the operator shall submit a detailed report on compliance with the regulations related to personal data protection.

There shall be only one such report per operator and it will apply to the all general and specific licences held by the operator.

In accordance with article 16.4 of the Gambling Act 13/2011 of 27 May, the Directorate General for the Regulation of Gambling shall request a report from the Spanish Data Protection Agency.

Ten. *Procedure on managing substantial changes to the technical gambling system.*

The introduction of any substantial modification affecting a critical component shall require the prior approval from the Directorate General for the Regulation of Gambling after the submission of the relevant certification report. The Directorate General for the Regulation of Gambling shall give its decision on approving the substantial changes to critical components within one month from the date on which the operator's application is received.

The Directorate General for the Regulation of Gambling may classify other components as critical in addition to those noted in the final certification reports or those classified as such by the operator.

In the event of extraordinary emergency situations affecting security, which have been duly substantiated and reported to the Directorate General for the Regulation of Gambling, the operator may introduce substantial changes to the critical components and apply for their approval at a later date. In such cases and in order to obtain the authorisation, the operator shall submit to the Directorate General for the Regulation of Gambling a report substantiating the



exceptional circumstances and the risk to the security of the technical gambling system together with the certification report.

From the moment the licence is granted until the operator submits the final certification reports, the operator may request approval for introducing substantial changes to the technical gambling system in accordance with the specific procedure on applying for substantial changes. However, the time limit for deciding on the approval of said substantial changes shall not commence until after the decision on authorising the technical system that is based on the technical draft previously assessed for granting the licence.

Subsequent to authorisation of the system, the operator shall prepare a detailed report every quarter on all changes made to the technical gambling system and provide it to the Directorate General for the Regulation of Gambling. The following documentation shall be included:

- An executive summary in the Spanish language, which makes qualitative explanations on the changes made.
- The description of the updated technical system covered by the licence, with the content described in article four of appendix I of the Resolution approving this regulation.

The Directorate General for the Regulation of Gambling may establish an obligation to include fingerprinting of binary files in the quarterly reports detailing all changes made to the technical gambling system.

The Directorate General for the Regulation of Gambling shall request from the operator all information considered necessary in relation to the changes made.

If the Directorate General for the Regulation of Gambling deems a change made to the critical components is of a substantial nature, it shall require the operator to undergo the authorisation process for the change, without prejudice to the possibility of requiring the operator to undo said change until obtaining the relevant authorisation.



Eleven. *Fingerprints.*

With regard to the procedure for obtaining the fingerprint of the software referred to herein, the following aspects must be observed:

- a) The SHA-1 algorithm shall be used unless the use of another algorithm is justifiable on a technical basis. Any other algorithm must be approved in advance by the Directorate General for the Regulation of Gambling.
- b) The tool or procedure used for obtaining fingerprints, as well as the tool or procedure for validating the obtained fingerprints, must be attached with the fingerprints. The necessary tools or a statement on their publicly and freely accessible location must be attached in digital form.
- c) Where the tools are patented or subject to intellectual property rights, the Directorate General for the Regulation of Gambling and any other certification body must be informed on how they can gain free access to and the right to use such tools.

APPENDIX II

Operator's descriptive questionnaire.

The questionnaire shall collect information on the operator, its business and the technical gambling system for carrying out and operating the licensed gambling.

The questionnaire shall include the following information:

- Identification details of the operator, the licences held and the commencement of its business.
- Information regarding the operator's contacts.
- Description of software providers.
- Listing of the operator's websites.



- Listing of websites with domains other than ".es" which are owned or controlled by the gambling operator, its parent company or subsidiaries.
- Types of means used for verifying the identity of the players.
- Listing of the payment methods used and the commencement date of their marketing. The types of payment methods must be adapted to the classification established in the Resolution approving the data model for use in the information monitoring system of gambling operation records.
- Information relating to the co-organised gambling networks.
- Description of the gambling on offer. A list of the gambling versions.
- Description of the applications for access by participants.
- Description of the communication channels used and the types of access technology.

The questionnaire may also include any other details on the technical gambling system that is relevant to the authorisation process.

To assist in completing the questionnaire, it shall be published in a digital format on the website of the Directorate General for the Regulation of Gambling.

The Directorate General for the Regulation of Gambling may update the content and format of the questionnaire. In all cases, the latest published questionnaire is the version that must be completed.

APPENDIX III

Form and minimum content of the certification report of functionality.

The final certification report of functionality is composed of sections and must contain the minimum content that is detailed as follows:

1. Identification of the certification.
2. Description of the certification's subject matter.
3. Executive summary of the functionality certification.
4. Compliance details on the technical requirements.
5. Details of specific analyses.



6. Details of integration tests
7. Description of certification team, dates and place.
8. Description of the test environments differing from those used by the operator in carrying out the gambling activity.
9. Description of the digital supporting documentation accompanying the certification report.

1. *Identification of the certification*

The first page of the report shall describe the following:

- a) Type of certification report: "Final certification report of functionality" shall be stated.
- b) Identification code of the report: The identification code of the report shall be unique, allowing the report to be referred to unambiguously and distinct from any other report issued by the certification body. Any time that the certification body modifies a report, a new identification code for the report must be generated.
- c) Details identifying the certification body.
- d) Details identifying the report's signatory on behalf of the certification body.
- e) Dates on which the certification work was performed.
- f) Publication date of the certification report.

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

The subject matter of the certification shall describe the scope of the technical gambling system undergoing certification and shall include, at least, the following information:

- The identification of software components used in the technical system for carrying out and operating the licensed gambling, with a clear reference to the manufacturer, product name and version. In all cases the data capturer and storage regarding the components must be recorded.



- An account of the critical components and their fingerprints. This account may be attached in a separate section, such as an appendix, while obeying order criteria.
- The identification of the data centres where they are installed.
- Certified access channels (Internet SMS, IVR, on-site, etc.).

For general licences:

- Certified websites and brand names.
- The version of the web service for verifying player identity which is checked by the system.
- Payment methods used during the certification.

For specific licences:

- Certified websites and brand names.
- The operator's role: it must be stated whether the operator acts as a B2C, B2B or both. In the case of a B2B operator, it must be stated whether the operator acts as a gambling co-organiser, i.e., whether it manages gambling platforms of which other gambling operators that pool together the amounts gambled by their respective users are members.
- The gambling on offer within the scope of the certification, which also indicates the certified versions of the gambling activity. For each gambling activity and certified version, the manufacturing name, brand name and, if applicable, the correlation with the gambling activities and versions permitted by basic regulations must be stated.
- Types of access technology for the technical gambling system, for example:
 - Web access.
 - Flash-based downloadable client.
 - PC-based downloadable clients (with indication of target operating systems).
 - Native applications for smartphones, tablets or other mobile devices (with indication of target operating systems)
 - Web-accessible mobile clients, e.g., based on HTML.



For bets with bookmakers on sporting events and exchange bets, it must be stated whether the gambling on offer includes live betting.

Where the scope of the certification report includes several gambling versions, for every test, analysis or technical requirement, it must be stated throughout the report whether the given assessment or any other included information refers to all versions or, where appropriate, only to particular versions.

3. *Executive summary of the functionality certification.*

3.1 Overall classification of functionality.

An overall classification on compliance with the technical requirements by the technical gambling system used by the operator in relation to the licence shall be included. The classification may be "Compliant" or "Not compliant".

This classification may only show "Compliant" if the certification body considers that the technical gambling system used by the operator on the basis of the licence satisfies all applicable requirements.

Overall classification of functionality	The analysis result shall be classified, on an overall basis, as "Compliant" or "Not compliant".
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3.2 Summary table on compliance with technical requirements.

The requirement areas whose compliance must be certified for every licence are listed in appendix V of the Resolution approving this regulation.

The possible classifications for each requirement are: "Compliant", "Not compliant" or "Not applicable".

The technical requirements have been grouped by area.

The executive summary shall contain a summary table showing the number of requirements that received a particular classification for each area.

The classifications shall be described as follows:



Area XXX..... Area YYY.....	Number of requirement s	Number of compliant requirement s	Number of non- compliant requirement s	Number of non- applicable requirement s
	7	6	0	1
	4	4	0	0

3.3 Summary table of the specific analyses.

For particular functionalities of significant relevance, the certification body must perform several specific analyses. In some cases, it will be necessary to describe, in a later section, the performed analysis.

3.3.1 Analysis of checks on identity and prohibitions.

This analysis shall apply only to general licences.

Classification.	In relation to the technical requirements on this subject, the overall classification of the analysis results shall be either "Compliant" or "Not compliant".
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General details

Are non-resident participants accepted?	Yes/No.
Is gambling without a user registration allowed?	Yes/No. If yes, list the gambling activities in which it is allowed.
Channels for proving identity.	Provide a list of channels: internet, telephone, SMS, on-site, others.

Checks prior to activating the user registration

Is the service for identity verification of residents provided by the Directorate General for the Regulation of Gambling used?	Yes/No. If used, but not in all cases, state when.
Other means of checking identity.	List of other means used for checking identity.



Identification documents accepted for non-residents.	List of documents accepted for proving the identity of non-residents.
Check on legal age?	Yes/No.
Is the verification service for registration in the RGIAJ used?	Yes/No.
Are checks made for connected persons?	Yes/No.

Checks prior to the payment of prizes

Is the service on changes to the RGIAJ used and the operator's list of prohibited persons updated?	Yes/No.
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3.3.2 Analysis of the random number generator.

This analysis shall apply only to specific licences where a random number generator (GNA) is used.

Classification.	In relation to the technical requirements on this subject, the overall classification of the analysis results shall be either "Compliant" or "Not compliant".
Manufacturer.	GNA manufacturer details.
Product and version.	Name of software component and version.
Fingerprint.	Binary file fingerprint.
Type of GNA.	It must indicate: - Hardware GNA. - Software GNA.
True-random/Pseudo-random.	It must indicate: - True-random. - Pseudo-random. In the case of being a true random number generator, the name of the phenomenon on which it is based shall be stated.
Shared GNA.	One of the following values shall be indicated: - Application of a GNA not shared with other gambling activities. - Application of a GNA shared with other gambling activities. Indicate which activities. - GNA integrated into the game software. - Others. Specify.
Algorithm.	In the case of hardware GNA, the name of the



	phenomenon on which it is based shall be stated. In the case of software GNA, the name of the algorithm, as well as the name of the operating system's library or calls on which it is based, shall be noted. It is to be noted if it is based on its own algorithm.
Reseeding.	State Yes/No including the reseeding procedure.
Space length.	Space length of different random numbers, measured in bits.
List of statistical tests.	List of the names of the performed statistical tests.

3.3.3 Analysis of the percentage return to player.

This analysis shall apply only to those gambling activities under a specific licence which have a return percentage.

Percentage return to player published for the gambling activity.	The percentage return published by the operator for each gambling activity shall be stated. The location where the percentage return is published shall also be mentioned.
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3.3.4 Analysis of the game logic and random events.

This analysis shall apply only to specific licences.

Compliance with the particular rules of the game.	Yes/No.
System of risk management for bets with a bookmaker.	Statement on the custom development or name of the product or service used.
Audit of changes to the configuration through parameters of the risk management system in relation to bets with a bookmaker.	Yes/No.
Audit of changes made by the operator's staff to bets.	Yes/No.
List of random events.	List of events which involve the random number generator with an



	indication on whether they are pre-sequenced.
Audit of changes to the configuration through parameters of the game logic.	Yes/No.

3.3.5 Measures to combat fraud and money laundering.

This analysis shall apply only to general licences and must describe the measures established by the operator for monitoring fraudulent or collusive behaviour by players.

Existence of technical measures for combating fraud and money laundering.	Yes/No.
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3.4 Summary table of integration tests.

The table shall include the classification of the conducted integration tests divided by area, which must include, at least, the tests described in appendix VI. The name of any tests supplementing those described in appendix VI shall begin with an "X".

The results shall be described as follows:

Area of requirements A

A.1	Name of test.....	Compliant.
A.2	Name of test.....	Not applicable.
A.3	Name of test.....	Not compliant.
X.1	Name of additional test.....	Compliant.
X.2	Name of additional test.....	Compliant.

Requirement area and reference	Classification.
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Area of requirements B

B.1	Name of test.....	Compliant.
B.2	Name of test.....	Not applicable.
X.3	Name of additional test.....	Compliant.

4. *Compliance details on the technical requirements*

The technical requirements whose compliance must be certified for each licence are listed in appendix V of the Resolution approving this regulation.



The possible classifications for each requirement are: "Compliant", "Not compliant" or "Not applicable".

This section shall describe the fulfilment of each technical requirement. The requirements have been grouped by area.

Furthermore, it shall be necessary to document the following situations in the space left for observations:

- Where the reason for the requirement may be deemed "Not applicable".
- In the occurrence of any incidents even though they had been subsequently rectified.
- Where the tests have been conducted in environments differing from those used by the operator in carrying out the gambling activity.

The classifications shall be described as follows:

Requirement area and reference	Classification	Observations
Area of requirements X:		
Reference A	Compliant.	
Reference B	Not compliant.	It does not comply with the requirement because...
Reference C	Not applicable.	The requirement does not apply because...

The certification body must submit an appendix substantiating the tests conducted and the results obtained for each technical requirement.

5. *Details of specific analyses*

For particular functionalities of significant relevance, the certification body must perform several specific analyses which are described in this section.

5.1 Analysis of checks on identity and individual prohibitions.

The certification body shall analyse the checks on identity and individual prohibitions.

The analysis must provide, at least, the following details:



- General details:
 - Whether the system accepts non-resident participants.
 - Whether the system allows gambling without a user registration. The certification body must describe the gambling activity or activities to which this situation applies.
 - A list of channels through which the identity can be proved: Internet, telephone, SMS, on-site or others.

- The checks made prior to activating a user registration:
 - Whether the service for identity verification of residents provided by the Directorate General for the Regulation of Gambling is used.
 - List of other means used for checking identity.
 - The check on legal age.
 - Use of the verification service for registration in the RGIAJ.
 - The performance of checks for connected persons.

- Checks made prior to the payment of prizes:
 - Hourly usage of the RGIAJ service in relation to changes and the resulting update of both the operator's list of prohibited persons and the status of affected participants.

5.2 Analysis of the random number generator.

This analysis shall apply only to specific licences where a random number generator (GNA) is used.

The certification body shall describe the analyses or tests performed for substantiating the randomness of the GNA and the compliance with the technical requirements. It shall include summaries or supporting graphs, the number of conducted simulations, parameters used and the confidence interval. The certification body shall state whether there are reseeding procedures and whether they comply with the technical requirements.



In the case where there are configurable settings on which the operation of the GNA depends, the configuration values that were established for the certification must be indicated and described.

5.3 Analysis of the return to player in the gambling activities.

The certification body must describe the percentage return published by the operator for each gambling activity. The location where said percentage is published must also be checked.

The certification body must describe all configurable parameters affecting the return percentage to player and whether the technical gambling system allows the creation of an audit trail of changes to said parameters.

5.4 Analysis of the game logic and random events.

For each version of the gambling activities, the certification body must substantiate whether the gambling activity is carried out in compliance with the particular rules.

The certification body must analyse certain features of the game logic, the random events in the activity, configurable settings, gambling accounting and, in general, the capacity to audit any changes manually introduced to the bets or winners.

This analysis shall apply only to specific licences.

In the case of bets:

- Risk management system.

For bets with a bookmaker, the risk management system shall be described along with an indication as to whether a commercial application or custom development has been installed for this purpose.

It must be indicated whether the system used is configurable or not. If so, the most important configuration settings as well as the values set at the moment of the certification must be described.

Moreover, the certification body must include in the report whether the application saves a record of changes carried out on the risk management system. If such records are saved, the files or database tables storing this information shall be noted.



Also, for operators offering live betting, the certification body must describe the measures implemented by the operator in order to avoid players from betting on events that have already occurred or whose outcome is known (late betting).

– Audit of bets.

The certification body must clarify the application of bet management and the recording and tracing of changes that may be made by the operator's staff through back-office applications. The following of which, at least, shall be analysed:

- Changes to the details of a bet.
- Insertion of new bets.
- Deletion of bets.
- Changes to the outcome of an event.
- Changes to the awarding of prizes.

The audit of changes shall be described along with how any manipulation to the audit is prevented.

The files or database tables storing this audit information must be described.

– Fund management.

In parimutuel bets, the application managing the bookkeeping of funds must be analysed.

The application shall explain the recording and auditing in relation to the gambling fund, distribution of prizes, events lacking a particular category of winner or any other transaction.

In online casino games, poker, additional games and online slot-machines:

- Each random event implemented in the game, which involves a random number generator, shall be described. For example, where a deck of cards is initially shuffled; the sequence of cards where there is no initial shuffle; the production of bingo cards; sale of bingo cards; the pre-sequencing of bingo balls; the drawing of a bingo ball if not pre-sequenced; the spin of the roulette wheel; the spin of slot machine reels, etc.



– The account management of games, and of progressive jackpots, in those gambling activities allowing its use must be analysed. The amounts bet, prizes won, commissions calculated and progressive jackpots formed or applied must be capable of being audited.

– Audit of games.

The certification body must clarify the recording and tracing of changes that may be made by the operator's staff through back-office applications.

The audit of changes shall be described along with how any manipulation to the audit is prevented.

The files or database tables storing this audit information must be described.

– Where the software used for implementing the game logic is configurable, the certification body must describe and state the value of the configurable settings that are associated with the following features:

- Forms of gambling.
- Gambling strategy of the house or the level of risk assumed.
- Maximum amounts.
- Gambling rules.

The certification body must also verify that there is an audit trail for any changes to these settings.

5.5 Measures to combat fraud and money laundering.

This analysis shall apply only to general licences.

The certification body shall describe and assess the measures integrated into the technical gambling system for combating fraud and money laundering. It shall, furthermore, attach the documents or evidence gathered during the certification.

6. *Details of the integration tests*

This section shall describe the conducted integration tests, divided by area, which include, at a minimum, those tests described in appendix VI of the Resolution approving this regulation.



The name of tests supplementing those described in appendix VI shall begin with an "X".

The result of each test shall receive the classification "Compliant", "Not compliant" or "Not applicable", based on the expected result and compliance with the regulations.

Each test shall be described as follows:

Area.	From appendix VI.
Test reference.	From appendix VI or "X****" for supplementary tests.
Name of test.	
Description of test.	
Expected result.	
Type of test.	According to the classification of test types in appendix VI.
Time/date of test.	
Obtained result.	
Classification.	
Observations.	

In relation to the obtained result, the certification body must supply an appendix which documents the evidence for the result of the integration tests. Said evidence depends on the type of test performed and is described in appendix VI of the Resolution approving this regulation.

7. Description of certification team, dates and place

This section shall provide details on the work group who carries out the certification along with the place or places and the date or dates of the certification process.

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

In the event that particular tests of the technical gambling system are conducted under an environment different to that employed by the operator in carrying out



and operating the licensed gambling activity, the certification body must describe those different environments in this section.

For each particular environment, an account of the tests conducted under those environments shall be noted.

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

This section shall describe the content of the digital supporting documentation that accompanies the certification report.

The certification report shall have digital supporting documentation that is structured as follows:

- The entire certification report in digital format.
- The questionnaire describing the certification's subject-matter, in digital format.
- Evidence for the assessment on the technical requirements. This shall be placed within a folder entitled "Technical requirements".
- Evidence of the integration tests. This will be placed within a folder entitled "Integration".
- Copy of software components belonging to the technical gambling system, which contains binary file copies of the software components of the certified technical gambling system. These must be placed within a folder entitled "Binary" which contains sub-folders with the name of each software component that is mentioned in the questionnaire.

APPENDIX IV.

Form and content of the certification report on security.

The certification report on security is divided into sections and must contain the following minimum content:

1. Identification of the certification.



2. Description of the certification's subject matter.
3. Executive summary of the security certification.
4. Compliance details on the security requirements.
5. Details of specific audit analyses.
6. Description of certification team, dates and place.
7. Description of the digital supporting documentation accompanying the certification report.

1. *Identification of the certification*

The first page of the report shall describe the following:

- a) Type of certification report: "Final certification report on security" shall be stated.
- b) Identification code of the report: The identification code of the report shall be unique, allowing the report to be referred to unambiguously and distinct from any other report issued by the certification body. Any time that the certification body modifies a report, a new identification code for the report must be generated.
- c) Details identifying the certification body.
- d) Details identifying the report's signatory on behalf of the certification body.
- e) Dates on which the certification work was performed.
- f) Publication date of the certification report.

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

The subject matter of the security certification shall be the technical gambling system employed by the operator for carrying out and operating the licensed gambling activities in relation to the security procedures, processes, arrangements and measures in effect.

For the purposes of describing the scope of the security certification, both the data centres housing the technical gambling system and the software installed in the centres shall be listed, as well as the organisations where the security procedures, processes, plans and measures are implemented.



In order to describe the data centres (CPD) subject to the certification, the following shall be included:

CPD	Street, number	City	Country	Type	Business name of host
CPD 1					
CPD 2					
.....					

The fields "street", "number", "city" and "country" refer to the physical location of the CPD. The "type" field indicates the hosting method of the CPD and must match one of the following: "hosting", "co-location" or "own".

The field "business name of hosting company" only requires filling out if the "type" field is either one of: "hosting" or "co-location".

For each data centre, the technical system's software components, which are installed in the centres, must be identified with an express reference to the manufacturer, product name and version.

Additionally, there must be an account of the bodies in charge of managing security, i.e., applying security policies, procedures and measures recorded in the report.

3. *Executive summary of the security certification*

3.1 Overall classification of security.

An overall classification on compliance with the technical requirements on security by the technical gambling system used by the operator in relation to the licence shall be included. The classification may be "Compliant" or "Not compliant".

This classification may only show "Compliant" if the certification body considers that the technical gambling system used by the operator on the basis of the licence satisfies all applicable requirements.

Overall classification of security	The analysis result shall be classified, on an overall basis, as "Compliant" or "Not compliant".
ISO 27001 endorsement	It shall be stated whether certain



	requirements have been endorsed on the basis of an ISO 27001 certificate.
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3.2 Summary table on compliance with security requirements.

The technical requirements on security whose compliance must be certified for each licence are described in appendix VI of the Resolution approving this regulation.

The possible classifications for each requirement are: "Compliant", "Endorsed", "Not compliant" or "Not applicable".

The technical requirements have been grouped by area.

The executive summary shall contain a summary table showing the number of requirements that received a particular classification for each area.

The classifications shall be described as follows:

Area	Number of requirements	Number of compliant requirements	Number of endorsed requirements (ISO 27000)	Number of non-compliant requirements	Number of non-applicable requirements
Area XXX	7	6	0	0	1
Area YYY	4	3	1	0	0

3.3 Summary table of the specific audit analyses.

For particular areas of security, the certification body must perform several specific audit analyses which are described in a subsequent section.

This section shall contain an executive summary of those analyses:

3.3.1 Audit analysis of the critical components.

Classification.	In relation to the correct identification of critical components, the overall classification of the analysis results shall be either "Compliant" or "Not compliant".
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3.3.2 Audit analysis of change management.

Classification.	In relation to the technical requirements on this
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	subject, the overall classification of the analysis results shall be either "Compliant" or "Not compliant".
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3.3.3 Audit analysis on the management of business continuity and preventing information loss.

Classification.	In relation to the technical requirements on this subject, the overall classification of the analysis results shall be either "Compliant" or "Not compliant". The "Compliant" result conveys the certification body's opinion that the operator's technical system can achieve the recovery times or the maximum times permitted for data loss, which are analysed under this section.
Maximum recovery time after an emergency situation.	Among the maximum recovery times after an emergency situation, known as "recovery time objective (RTO)", which are provided by the operator, the worst time shall be noted.
Maximum time of information loss after an emergency situation.	Among the maximum times of information loss after an emergency situation, known as "recovery point objective (RPO)", which are provided by the operator, the worst time shall be noted.

4. Compliance details on the security requirements

The technical requirements on security whose compliance must be certified for each licence are described in appendix VI of the Resolution approving this regulation.

The possible classifications for each requirement are: "Compliant", "Not compliant" or "Not applicable".

This section shall describe the fulfilment of each technical requirement. The requirements have been grouped by area.

Furthermore, it shall be necessary to document the following situations in the space left for observations:

- The reason for the requirement being "Not applicable".
- In the occurrence of any incidents even though they had been subsequently rectified.



If certain requirements have been endorsed on the basis of an ISO 27001 certificate, the classification "Endorsed" shall be used and "ISO 27001" shall be noted in the observations field.

The classifications shall be described as follows:

Requirement area and reference	Classification	Observations	Document reference
Area of requirements X:			
Requirement AA	Compliant.		Document XXXXX section YY
Requirement XX	Not compliant.	It does not comply with the requirement because...	
Requirement YY.	Not applicable.	The requirement does not apply because...	
Requirement ZZ.	Endorsed.	ISO 27001	

The certification body must supply an appendix containing security documentation as well as all evidence confirming compliance with the requirements.

In cases where there is supporting documentation on the policy or procedure, the document reference as well as the heading under which compliance is supported must be stated in the space for observations.

The certification body must accredit the effective application of security controls on the technical gambling system being used. To this end, the tests supplementing the document check shall be described.

5. *Details of specific audit analyses*

For particular areas of security, the certification body must perform several specific audit analyses which are described in this section.

5.1 Audit analysis of the critical components.

The certification body shall issue an analysis on the operator's correct identification of the components critical to the technical gambling system.



The certification body shall include a list of those critical components and state whether the security on said components has been enhanced. Each component on the list and the corresponding software component or components mentioned in the operator's questionnaire must be noted.

5.2 Audit analysis of change management.

The certification body shall issue an analysis on the correct handling of the procedure on change management.

Where possible, the certification body shall attach evidence and documentation related to the last three changes managed by the operator prior to the moment the analysis is conducted.

Should the operator have a software tool for managing changes, the tool must be noted. The certification body must also show that any action (introduction, modification or withdrawal of a change) can be audited.

5.3 Audit analysis on the management of business continuity and preventing information loss.

The certification body must analyse the maximum recovery time following an emergency situation, known as "recovery time objective (RTO)", which is reported by the operator. The body must also assess whether the available technical measures are sufficient to achieve said time. The analysis must describe the technical measures and the use of redundancy systems, back-up file arrangements, support centres or other measures.

The certification body must analyse the maximum time of information loss following an emergency situation, known as "recovery point objective (RPO)", which is reported by the operator. The body must also assess whether the available technical measures are sufficient to achieve said time. The analysis must describe the technical measures and the use of redundancy systems, back-up file arrangements, support centres or other measures. The certification body must be sure that the measures available protect all user and gambling data held by the operator.

In relation to an unforeseen hazard, the possibility of an incident completely rendering a physical location as unusable must be assessed.



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

This section shall provide details on the work group who carries out the certification along with the place or places and the date or dates of the certification process.

7. *Description of the digital supporting documentation accompanying the certification report*

This section shall describe the content of the digital supporting documentation that accompanies the certification report.

The certification report shall have a digital appendix structured as follows:

- The entire certification report in a digital format.
- All security documentation used for the assessment of security, which shall be contained within a folder entitled "Documentation".
- Evidence for the assessment on the technical requirements of security. This shall be placed within a folder entitled "Technical requirements".

ISO 27001 certificate if it has been provided for the purposes of endorsement.

APPENDIX V.

List of technical functionality requirements.

The different requirements subject to certification are established under regulatory texts for gambling: Statute, Royal Decrees, Ministerial Orders and Resolutions.

The certification of the technical gambling system shall only apply to the obligations stipulated in the regulations that are directly connected to the technical assessment of equipment, software or means.



This section aims to provide a guide summarising the technical requirements found in the various regulatory texts, which must be taken into account for the certification of functionality.

The requirements are classified according to area and include the terminology to be used in the final certification reports on functionality.

Areas:

General licences:

- Area: Responsible Gambling.
- Area: Contract. Acceptance, copy and amendments.
- Area: User registration and exclusion checks.
- Area: Gambling account, amounts paid and collected.
- Area: Limits on deposits.
- Area: Record and traceability.
- Area: Terminals and session.
- Area: Communication channels
- Area: Applications for free gambling.
- Area: Internal control system.

Specific licences:

- Area: Return percentage and prize tables.
- Area: Random number generator.
- Area: Game logic.
- Area: Record and traceability.
- Area: Terminals and session.
- Area: Communication channels.
- Area: Applications for free gambling.
- Area: Graphic interface.
- Area: Behaviour in relation to technical faults.
- Area: Automatic gambling.
- Area: Move repetition.
- Area: Live gambling activities.
- Area: Various features.



- Area: Progressive jackpots.
- Area: Internal control system.
- Area: Realisation of the gambling activity.
- Area: Monetary limits for participation.
- Area: Duties of informing participants.
- Area: Promotion of gambling activities.

APPENDIX VI

Basic account of integration tests.

The purpose of this appendix is to describe the tests that must be conducted in order to certify the integration of the technical gambling systems of operators.

The integration tests must always be conducted in the environment that the operator actually uses for carrying out and operating the licensed gambling.

In integration tests requiring personal details of residents in Spain, the certification bodies may use the trial games provided on this basis by the Directorate General for the Regulation of Gambling for the production environment of the online verification services.

The tests are categorised according to the type of licence.

The following types of tests are described along with the minimum evidence to be gathered for each one:

a) Functional.

Functional tests shall consist of an evaluation of the external features of an application or system by using the same methods available to a participant or the management applications available to the operator's staff.

The minimum evidence that must be collected is:

- The conformity or non-conformity of the test.
- Screenshots showing the interaction between the gambling platform and either the participant or the operator's staff conducting the test.



b) Traceability.

Traceability tests shall consist of an analysis and cross-check of the records and traces created in the system when the particular test is performed. The records and traces used for this type of test shall be the records and traces from the information system of the central gambling unit and not those from the internal control system.

The minimum evidence that must be collected is:

- The conformity or non-conformity of the test.
- The screen shots that show the information related to the record or trace.
- The description of the information source (file, table, etc.) from which the record or trace has been obtained.

c) Real data.

The analysis of real data shall consist of verifying the proper accounting, format and completeness of the data created through the interaction between participants and the technical gambling system.

These integration tests in relation to real data shall require the technical gambling system to have at least one month of data, which may not be completed through tests or simulations.

The minimum evidence that must be collected is:

- The conformity or non-conformity of the test.
- The source (file, tables, etc.) from which the information has been obtained.
- All representative data required in each test.

The following are the basic integration tests according to the type of licence and categorised by area:

A. General Licences

A.1. User registration and exclusion checks.

Test reference	A.1.1
Name of test	Addition of user registration.
Type of test	Functional, Traceability.



Description of test	<p>From the participant's point of view, registration will proceed in the case of:</p> <ul style="list-style-type: none"> - A participant resident in Spain who has correct identity details, is of legal age and does not appear in the RGIAJ. - A non-resident participant. <p>This test must be performed by all operators regardless of whether user registration is necessary for gambling or for the recording of winners.</p>
Expected Result	<p>The result will include the DNI/NIE, time and date of every registration, so that the Directorate General for the Regulation of Gambling may later confirm that its verification services have been used.</p> <p>The user registration of a non-resident participant will include the code used to identify the customer along with the time and date of the tests.</p> <p>Functional</p> <p>It must be confirmed that the user has been registered on the system.</p> <p>The system must collect all information from the participant as detailed in RES_TEC Appendix I section 2.1.1.</p> <p>In the case of a non-resident participant, the system must request a copy of identification.</p> <p>Traceability</p> <p>The system's records and traces which collect the user registration details will be analysed.</p> <p>The traceability relating to the acceptance of the gambling contract, signed by the player, must be verified.</p>

Test reference	A.1.2
Name of test	Checks on individual prohibitions.
Type of test	Functional, traceability.
Description of test	<p>From the participant's point of view, registration will proceed in the case of:</p> <ul style="list-style-type: none"> - A participant resident in Spain who provides incorrect identity details. - A participant resident in Spain with correct identity details, who appears in the RGIAJ. - A participant resident in Spain with correct identity details but who is underage. - A participant not resident in Spain who is underage. <p>The test must be conducted with the operational verification services of the Directorate General for the Regulation of Gambling.</p>
Expected Result	<p>The result will include the DNI, time and date of every registration, so that the Directorate General for the Regulation of Gambling may later confirm that its verification services have been used.</p> <p>Functional</p> <p>The system must not allow the registration of minors, persons</p>



	<p>appearing in the RGIAJ or those whose verification details are incorrect.</p> <p>Traceability The system's records and traces which collect the user registration details will be analysed.</p>
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Test reference	A.1.3
Name of test	Validation of the DNI/NIE field.
Type of test	Functional, traceability.
Description of test	<p>This test will verify that the internal control system uses mechanisms to avoid the following scenarios:</p> <ul style="list-style-type: none"> - The introduction of wrong values into the DNI or NIE, such as, format errors, or letters not matching the number. - The activation of a user registration despite errors in the DNI or NIE. - Confusion of the NIE field for that of the DNI and vice versa.
Expected Result	The actions of the system for each of the above scenarios must be described along with an assessment on such actions.

A.2. Gambling account, amounts paid and collected.

Test reference	A.2.1
Name of test	Correct recording of transactions on the gambling account.
Type of test	Functional, traceability.
Description of test	<p>From the participant's point of view, deposits and withdrawals will be made on the gambling account.</p> <p>The possibility of performing other operations on the gambling account will be analysed.</p>
Expected Result	<p>The result will include the DNI, time and date and a description of every transaction carried out, so that the Directorate General for the Regulation of Gambling may later confirm that the data is correctly recorded in the internal control system</p> <p>Functional The proper accounting of deposits and withdrawals on the gambling account will be confirmed. If there are other operations available on the gambling account, the result will include a list of them. It will be confirmed that there is no account operation that allows a participant to receive credit from the operator or to make transfers to another participant.</p> <p>Traceability The system's records and traces which collect the deposit and withdrawal details will be analysed.</p>



A.3. Limits on deposits.

Test reference	A.3.1
Name of test	Depositing in excess of limits.
Type of test	Functional, traceability.
Description of test	<p>The system will be accessed with an account that has a default daily, weekly or monthly deposit limit.</p> <p>The limits will be reduced to €10, €15 and €20 respectively. Deposits under the limit will be made. Deposits over the limit will be made.</p> <p>Each limit, whether daily, weekly or monthly, must be tested by using various time-frame combinations.</p>
Expected Result	<p>Functional. The system allows limits to be reduced. The system allows deposits under the limit but does not allow deposits over the limit.</p> <p>Traceability. The system's records and traces which show the changes to limits will be analysed.</p>

Test reference	A.3.2
Name of test	Deposit limit details.
Type of test	Real data.
Description of test	<p>The system's real data will be checked to ascertain how many participants have limits greater than the predetermined limits.</p> <p>If there are participants who have limits greater than the predetermined limits, it will be verified that the requisite applications for increasing limits were correctly made and assessed. For the purposes of this test, a sample of 5 participants will suffice for the check.</p>
Expected Result	<p>The result will include the identification code "PlayerID" of the analysed participants along with the dates when the applications for increasing limits were made and the dates when they were authorised.</p> <p>The system will be checked to ensure it keeps the records and traces of the applications, analyses and authorisations for the limit increases.</p>

A.4. Internet. Redirection to a ".es" domain name.

Test reference	A.4.1
Name of test	Redirection to a ".es" domain name
Type of test	Functional.
Description of test	The operator will supply the certification body with the list of websites without the ".es" domain where gambling is offered by its parent company, subsidiaries or itself.



	The certification body will access each website from a Spanish IP address and verify the redirection.
Expected Result	The redirection to the ".es" domain will be confirmed. The certification body will list the websites without the ".es" domain that were accessed in this test.

A.5. Internal Control System.

Test reference	A.5.1
Name of test	Completeness of RUT and CJT records.
Type of test	Real data.
Description of test	<p>This test will compare the data in the SCI with the data held in the operator's information system for the purpose of assessing the completeness of the SCI data.</p> <p>The following monthly data will be obtained:</p> <p>From the monthly RUT record:</p> <ul style="list-style-type: none">· Number of registrations.· Number of participants according to status. <p>From the monthly CJT record:</p> <ul style="list-style-type: none">· Opening balance.· Deposits.· Withdrawals.· Wagered amounts.· Reimbursement of wagered amounts.· Prizes.· Closing balance.· Prizes in kind.· Other transactions. <p>This test requires access by the certification body to unencrypted real data. The operator must provide the certification body with unencrypted monthly RUT and CJT files. The certification body must confirm whether the files correspond to the files actually stored on the operator's information system.</p> <p>The certification body is not required to know the encryption key under any circumstances.</p>
Expected Result	<p>For the monthly RUT:</p> <ul style="list-style-type: none">- The data of the RUT file will be compared with the lists obtained from the back-office application of the technical gambling system. <p>The certification body must be certain of the accuracy of these lists since they are the source against which the completeness of</p>



	<p>the SCI's real data is compared.</p> <p>For the monthly CJT:</p> <ul style="list-style-type: none">- The data of the CJT file will be compared with the lists obtained from the back-office application of the technical gambling system. The certification body must be certain of the accuracy of these lists since they are the source against which the completeness of the SCI's real data is compared.- The opening balance of one month will be confirmed to be equal to the closing balance of the previous month.- The closing balance will be confirmed to equal the sum of the opening balance and the total of all transactions for that month. <p>As a result of this test, the certification body must include:</p> <ul style="list-style-type: none">- The conformity of the checks made and substantiation for those checks. <p>NOTE: The checks and calculations will be done separately, both in the Euro currency and in any other units, whether bonus points or others.</p>
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Test reference	A.5.2
Name of test	Valid certificate.
Type of test	Real data.
Description of test	<p>This test will verify what digital certificate is used for signing data. It will also confirm that the certificate is valid and has not been revoked.</p> <p>The certification body is not required to know the encryption key under any circumstances.</p>
Expected Result	<p>The certification body will confirm what digital certificate is used for signing data. It will also confirm that the certificate is valid and has not been revoked.</p> <p>In the result, the certification body will note the public key of the certificate used for signing the data of the storage system.</p>



Executive summary form for integration tests in relation to general licences.

Area and	Classification
A.1 User registration and exclusion checks.	
A.1.1 Addition of user registration.	
A.1.2 Checks on individual prohibitions.	
A.1.3 DNI/NIE field validation.	
A.2 Gambling account, amounts paid and collected.	
A.2.1 Correct recording of transactions on the gambling account.	
A.3 Limits on deposits.	
A.3.1 Depositing in excess of limits.	
A.3.2 Deposit limit details.	
A.4 Internet. Redirection to a ".es" domain name	
A.4.1 Redirection to a ".es" domain name	
A.5 Internal Control System.	
A.5.1 Completeness of RUT and CJT records.	
A.5.2 Valid certificate.	

B. Specific Licences.

B.1. Gambling on offer.

Test reference	B.1.1
Name of test	Gambling on offer and gambling versions.
Type of test	Functional.
Description of test	<p>The player's interface will be used to access the gambling on offer and check that it matches the specific licence.</p> <p>The available gambling on offer will be analysed from each type of application or terminal used for participation.</p> <p>Each gambling activity and offered version will be analysed along with whether they correspond to the gambling activities and versions allowed by the basic regulations.</p> <p>Gambling is not required to perform this test, instead it will suffice to analyse the information published by the operator, whether it be the rules of the gambling activities or strictly informative details.</p>
Expected Result	<p>The result will contain an account of the following information:</p> <ul style="list-style-type: none"> - the marketed name of the detected gambling activities and versions. - the applications or terminals from which they are available.



	<ul style="list-style-type: none"> - the correlation with versions from the basic regulations. - the version of the particular rules assessed. <p>This information will be compared with the descriptive questionnaire of the licence completed by the operator.</p>
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Test reference	B.1.2
Name of test	Realisation of the gambling activity and correct accounting.
Type of test	Functional, traceability.
Description of test	<p>The player's interface will be used to participate in gambling and:</p> <ul style="list-style-type: none"> - check the correct accounting of bets, prizes, fees or others. - in gambling activities where the operator charges a fee, it must be verified that the calculation of fees coincides with the calculation stipulated in the particular rules. - an attempt will be made to enter a wager greater than the balance available in the gambling account. In specific gambling activities, it will be verified: <ul style="list-style-type: none"> - For betting, that bets cannot be placed at times not prescribed by the particular rules, and especially following the close of a bet promotion, from the start of the event for conventional betting, or from the end of the event for live betting. - For bingo, that cards cannot be bought outside the promotion period, or when the game has commenced. - For poker or casino games, that bets cannot be placed outside the times designated in the particular rules. - For slot machines, it will be checked that, when the slot machine game session automatically concludes due to the time or money limit set during the session's configuration, the game in progress closes in an orderly manner and the accounting is correct. <p>Note: This test will be repeated for each type of application or terminal used for participation as well as for each gambling activity, version or form.</p>
Expected Result	<p>Functional</p> <p>The conformity of the above described verifications, broken down for each analysed version.</p> <p>It will be confirmed that a wager greater than the balance available in the gambling account cannot be made. The version of the particular rules will also be noted.</p> <p>Traceability</p> <p>The result will detail the tables, files or others containing the information.</p>



	An opinion will be expressed on whether the recording system of the technical gambling system can recover information accounting for every situation and completely reconstruct the history of every game.
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Test reference	B.1.3
Name of test	Tracing the wager in relation to channels other than the internet.
Type of test	Traceability
Description of test	Where applicable, several wagers will be made from every channel other than the internet, e.g. SMS and telephone.
Expected Result	Traceability The system's records and traces of every participation channel used will be analysed. In the case of SMS and telephone channels, it will be confirmed that the following details are kept: - time/date of every message or phone call. - telephone number from which the message or call was made. - content of the message or call.

B.2. Monetary limits for participation.

Test reference	B.2.1
Name of test	Monetary limits for participation.
Type of test	Functional.
Description of test	<p>The system's compliance with monetary limits, i.e. maximum amounts for participation and prizes, will be verified.</p> <p>To this end, the certification body will participate in gambling and attempt to exceed each limit described in appendix III section two of the ministerial orders in relation to gambling activities.</p> <p>For online slot-machines, the system's compliance with both the monetary limit and time limit set at the beginning of the online slot-machine game session will be verified. It will also be verified that the amount of money a single participant can allocate to gambling on the slot machine may not exceed the balance held by the participant in his gambling account at the moment of initiating the online slot-machine game session, taking into account any increase to the balance by the winnings obtained during said session.</p>
Expected Result	The performed tests and obtained result will be recorded.



B.3. Behaviour in relation to technical faults.

Test reference	B.3.1
Name of test	Loss of connection with the customer.
Type of test	Functional.
Description of test	<p>Tests will be performed for commencing a game and then causing a connection loss with the central gambling unit.</p> <p>The connection will be re-established after 1 minute, 5 minutes or 15 minutes (different time intervals).</p> <p>The reaction of the system for concluding the game and its compliance with particular rules in this regard will be verified. This test must be conducted for each application or customer terminal and each gambling activity or offered form.</p>
Expected Result	<p>Compliance with the particular rules will be noted.</p> <p>The result will state the consequent action of each application or customer terminal and for each gambling activity or form.</p> <p>The version of the particular rules that were analysed will also be included.</p>

Test reference	B.3.2
Name of test	Error in the customer terminal.
Type of test	Functional.
Description of test	<p>A game will be started and then an unexpected shut down of the customer terminal will be caused.</p> <p>The terminal will be restarted after 1 minute, 5 minutes or 15 minutes (different time intervals).</p> <p>The reaction of the system for concluding the game and its compliance with particular rules in this regard will be verified. This test must be conducted for each application or customer terminal and each gambling activity or offered form.</p>
Expected Result	<p>Compliance with the particular rules will be noted.</p> <p>The result will state the consequent action of each application or customer terminal and for each gambling activity or form.</p> <p>The version of the particular rules that were analysed will also be included.</p>



B.4. Internal control system.

Test reference	B.4.1
Name of test	Completeness of OPT/ORT records.
Type of test	Real data.
Description of test	<p>This test will compare the data in the SCI with the data held in the operator's information system for the purpose of assessing the completeness of the SCI data.</p> <p>The following monthly data will be obtained:</p> <p>From the monthly OPT/ORT record:</p> <ul style="list-style-type: none">• Wagered amounts.• Reimbursement of wagered amounts.• Prizes.• Prizes in kind. <p>This test requires access by the certification body to unencrypted real data. The operator must provide the certification body with unencrypted OPT/ORT files. The certification body must confirm whether the files correspond to the files actually stored on the operator's information system. The certification body is not required to have access to personal data.</p> <p>The certification body is not required to know the encryption key under any circumstances.</p>



Expected Result	<p>The data of the OPT/ORT files will be compared with the lists obtained from the back-office application of the technical gambling system. The certification body must be certain of the accuracy of these lists since they are the source against which the completeness of the SCI's real data is compared.</p> <p>As a result of this test, the certification body must include:</p> <ul style="list-style-type: none">- The conformity of the performed checks.- Calculated on the basis of monthly data, the following OPT/ORT data for every month: <p>The ratio between the prize amount and the amount wagered in gambling (to 4 decimal places). Note: The result will not directly include the turnover figures. Note: The checks and calculations will be done separately, both in the Euro currency and in any other units, whether bonus points or others.</p>
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Test reference	B.4.2
Name of test	Completeness of JUD/JUT records.
Type of test	Real data.
Description of test	<p>This test will compare the data in the SCI with the data held in the operator's information system for the purpose of assessing the completeness of the SCI data.</p> <p>The following daily data corresponding to the 5 days prior to the test will be obtained:</p> <p>From the JUT/JUD records:</p> <ul style="list-style-type: none">· Number of games for each gambling form· A random sampling of 5 games will be taken and their data will be compared with the operator's information system. For example, the participants, the prizes, the event in the case of a bet or the number of SMS's in the case of a competition. <p>This test requires access by the certification body to unencrypted real data. The operator must provide the certification body with unencrypted JUT/JUD files. The certification body must confirm whether the files correspond to the files actually stored on the operator's information system. The certification body is not required to have access to personal data.</p> <p>The certification body is not required to know the encryption key under any circumstances.</p>



Expected Result	<p>The data of the JUT/JUD files will be compared with the lists obtained from the back-office application of the technical gambling system. The certification body must be certain of the accuracy of these lists since they are the source against which the completeness of the SCI's real data is compared.</p> <p>As a result of this test, the certification body must include:</p> <ul style="list-style-type: none">- The conformity of the performed checks. <p>Note: The result will not directly include the turnover figures. Note: The checks and calculations will be done separately, both in the Euro currency and in any other units, whether bonus points or others.</p>
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Executive summary form for predefined tests in relation to specific licences.

Area and	Classification
B.1 Gambling on offer.	
B.1.1. Gambling on offer and gambling versions.	
B.1.2 Realisation of the gambling activity and correct accounting.	
B.1.6 Tracing the wager in relation to channels other than the	
B.2 Monetary limits for participation.	
B.2.1 Monetary limits for participation.	
B.3. Behaviour in relation to technical faults.	
B.3.1 Loss of connection with the customer.	
B.3.2 Error in the customer terminal.	
B.4. Internal control system.	
B.4.1 Completeness of OPT/ORT records.	
B.4.2 Completeness of JUT/JUD records.	

APPENDIX VII

Account of technical security requirements.

The purpose of this Appendix is to establish the list of requirements that are to be complied with by the technical systems of gambling operators, in accordance with the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, and which must be verified by certification bodies in their final certification reports.

The areas requiring verification from the certification bodies and the order in which they must be presented in the relevant report is as follows:

a) Security Policy.

In accordance with section 4.4 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving



the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. The operator has security procedures.
2. All employees of the operator and, where appropriate, collaborating businesses have been informed of the security procedures.

Those organisations with a valid ISO 27001 certificate, may be considered compliant with requirements 1 and 2. The observations section shall note "ISO 27001".

- b) Risk analysis and management.

In accordance with sections 4.1, 4.2 and 4.3 of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. The operator has a programme for the analysis and management of risks.
2. The risk analysis is periodically reviewed.
3. The organisation has identified the critical components of the Technical Gambling System.
4. The list of critical components includes:
 - a) The user registration.
 - b) The gambling account.
 - c) The processing of payment methods.
 - d) In relation to the random number generator: components of the technical gambling system which transmit or process randomised numbers upon which



the outcome of gambling activities are based and the integration of the outcomes from the random number generator into the game logic.

- e) Those components that store, handle or transmit sensitive information relating to customers (personal data), authentication, etc.
- f) Those components that store the occasional status of gambling activities. g) Connections with the Directorate General for the Regulation of Gambling.
- h) With regard to the internal control system: the data capturer and the storage system.
- i) Points of access and communications to and from the above-mentioned critical components.
- j) Communication networks that transmit sensitive information of the participants.

5. The operator has enhanced security for all critical components.

With regard to requirements 4 and 5, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.

- c) Organisation of the Information Security.

In accordance with section 4.5 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that the organisation has outlined a management framework for information security and has described the roles and responsibilities of its staff.

Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".



d) Security of communications with participants.

In accordance with sections 2.1.12 and 4.6 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. The operator has adopted authentication mechanisms allowing the gambling system to identify the participant and vice versa.
2. In relation to the transmission of personal or financial details (i.e. the user registration and gambling account respectively), such communications are encrypted.
3. The operator has adopted all necessary measures for guaranteeing the completeness and non-rejection of communications where personal or financial details are transmitted, and where gambling transactions are involved.
4. An initial user password is established either by default or by the participant.
5. During the process of creating a user password, the participant is informed of the good practices in relation to choosing secure passwords.
6. The minimum length of passwords is 8 characters or digits and includes elements from at least three of the following categories: numbers, lower-case letters, upper-case letters and other symbols.
7. The password cannot contain any of the following details: the username, pseudonym, given name, surname(s) or date of birth of the participant.
8. The user is reminded, on at least a yearly basis, to change his password, although such changes are not compulsory.
9. The identification mechanism by means of the username and password is locked if, during the same day, 5 failed attempts at access are made. The operator is allowed to establish a limit of fewer attempts to this requirement.
10. The operator's system is designed so as to require the authentication of the participant prior to each commencement of a user session and, where appropriate, the entering of the password. The system does not use cookies or



any other mechanisms for avoiding the authentication of the user or the entering of the password.

11. The operator has a procedure for detecting accounts that are inactive for a reasonably extended period, thereby requiring a greater-than-normal authentication level or additional verifications through the customer service centre prior to allowing the participant to resume gambling and, in particular, the withdrawing of funds.

12. The operator has a procedure for detecting, insofar as reasonable, unauthorised access to accounts of participants, phishing attempts or access to their personal details.

13. The operator shall have a procedure for detecting sudden changes in the behaviour of a participant and, in particular, in the amounts deposited or withdrawn. Accordingly, the operator shall initiate any action necessary for preventing the access to a gambling account by a third party.

With regard to the above requirements, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.

e) Staff and third-party security.

In accordance with section 4.7 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. The operator possesses a plan for staff security.
2. The plan includes training for all employees of the organisation and pays particular attention to permitting access to information and critical components.
3. In cases of the operator requiring services from third parties that may involve access, processing, communication or handling of information, or even



access to facilities, products or services related to gambling, said third parties must fulfil all security requirements that are applicable to the operator's staff. Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".

f) Physical and environmental security.

In accordance with section 4.8 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. There is a plan for the physical security of the components of the technical gambling system.
2. Perimeter security is established for areas containing critical components and sensitive information.
3. There is a physical access control to facilities, which store equipment, for both employees and outsourced staff. Such control includes physical items, authorisation procedures, access records and surveillance services.
4. The operator has taken into account protection from environmental risks: water, fire, risks caused by any person, etc.
5. Critical equipment is protected from electricity cuts and other interruptions caused by faults in ancillary facilities while the cabling of the electrical mains is protected from damage.
6. The operator has established mechanisms for access control to the communications cables in the event that unencrypted critical information is transmitted through them.
7. The appropriate maintenance of facilities and equipment is planned and provided.



8. Devices containing information are securely erased or destroyed prior to their reuse or disposal.
9. Equipment containing information cannot be transferred outside of secure facilities without proper authorisation.

With regard to the requirements 2, 3, 4, 5, 7, 8 and 9 above, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.

Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".

g) Management of Communications and Operations.

In accordance with section 4.9 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. Critical components are be monitored in order to prevent the possible use of versions different to the authorised versions.
2. The integrity and confidentiality of communications between the components of the technical gambling system are guaranteed.
3. Tasks are divided among the different areas of responsibility in order to minimise the possibility of unauthorised access and potential damage.
4. Tasks related to development, tests and production are separated.
5. Services provided by third parties include security controls and metrics in the contracts and such services are audited and monitored on a periodic basis.
6. Measures have been adopted to protect the system from malicious code.



7. Backup files are created on an appropriate regular basis and are securely stored as per the plan for backup files.
8. Security measures for the communications network have been adopted.
9. Security measures preventing the manipulation of removable media, as well as measures for the secure erasure or destruction of such media, have been adopted and expressed in a documented procedure.
10. The internal clocks of all components, in particular critical components, are synchronised with a reliable time source and the operator has established measures and controls aimed at preventing the tampering of time stamps or their later modification, especially in the audit trails.
11. An audit trail for the activities of all users, information security exceptions and incidents covering a minimum period of 2 years is created and kept.
12. The audit trails are protected from any alteration and unauthorised access.
13. The activities of the System Administrator and System Operator are recorded.
14. The audit trails are periodically analysed and actions based on any detected incidents are undertaken.

With regard to the requirements 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14 above, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.

Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".

h) Access Control.

In accordance with section 4.10 of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems



licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. The policy on information access is documented.
2. Authorised access is ensured, while unauthorised access is prevented, through controls on user logins, management of access privileges, periodic review of such privileges and a policy on the management of passwords.
3. Users follow good practices in the use of passwords and adequately protect documentation and media at their workstations.
4. Users have access only to those services that they have been authorised to use.
5. There are no generic usernames and all users have access through the use of their own unique username.
6. The system authenticates each and every access, whether by the system's staff, maintenance staff, etc., or by other systems and components. Access by the inspection staff of the Directorate General for the Regulation of Gambling or other staff acting on its behalf will also be authenticated.
7. The networks are separated on the basis of the area and accountability of the task or role.
8. Access to operational systems requires a secure authentication mechanism.
9. The use of programs allowing the bypass of access and security controls is restricted and controlled.
10. User sessions have a maximum time limit of connection and also a period of inactivity leading to disconnection.
11. IT staff has restricted access to the real data of applications. Sensitive real data is located in isolated environments.
12. Risks associated with mobile devices are managed.
13. Where teleworking is possible, the associated risk is being managed within the framework of the security plan.

With regard to the requirements 1, 2, 3, 4, 6, 7, 8, 9, 10, 11 and 12 above, the certification body shall note in the part for observations the document



references and the document headings under which compliance with the requirements is confirmed.

Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".

i) System purchase, development and maintenance.

In accordance with section 4.11 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that there is a security plan in relation to the decision process on the purchase, development and maintenance of information systems.

Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".

j) Management of security incidents.

In accordance with section 4.12 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. There is a documented procedure for the management of any security incidents.
2. There is a record of security incidents (containing facts, consequences and adopted measures).



Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".

k) Change management.

In accordance with section 4.13 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May and the provisions of section ten of this Regulation, the certification body must verify that:

1. There is a procedure for managing changes to equipment and components of the technical gambling system in the production environment.
2. There is an internal approval process for changes (change request, approval by those in charge).
3. A record of changes (requests, adopted decisions) is kept, which may be audited later.
4. In the case of changes to critical components, it must be assessed whether such changes are of a significant nature.
5. In relation to all software versions used in the technical system, the operator must store copies of the binary files of the software elements.

The Directorate General for the Regulation of Gambling may establish an obligation to include a fingerprint of the binary files that are the subject of the storage procedure.

With regard to the requirements 1, 2, 3, 4 and 5 above, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.



l) Plan for preventing information loss.

In accordance with section 4.15 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. There is a plan for preventing the loss of data or transactions affecting the realisation of gambling activities, rights of participants or the public interest.
2. There is an action plan for complying with the plan for preventing information loss, which includes the following features:
 - a) The location where copies of the information are kept.
 - b) Security measures for protecting the copy from unauthorised access.
3. There is a procedure for action in the event of information loss, which includes the following features:
 - a) Mechanisms for handling claims.
 - b) Mechanisms for continuing interrupted gambling.

With regard to the requirements 1, 2, and 3 above, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.

m) Business continuity management.

In accordance with sections 4.14 and 4.16 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved



technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. There are steps for continuing business after emergency conditions, which include the following features:

- a) Technical, staff and organisational measures necessary for guaranteeing service continuity.
- b) A replication of the Central Gambling Unit allowing the smooth realisation of the gambling activities.

2. The continuity plan takes into account the following scenarios:

- a) User registration and gambling account, with the possibility of checking the balance and transactions on associated gambling accounts. The maximum amount of time for providing these services again shall be one week.
- b) Withdrawal of funds. The maximum amount of time for providing these services again shall be one week.
- c) The continuation of incomplete gambling activities or pending bets and the paying out of validly won prizes. The maximum amount of time for providing these services again shall be one month.
- d) The complete re-establishment of all services.

3. All scenarios include the following information:

- a) Recovered services.
- b) Maximum recovery time.

With regard to the requirements 1, 2, and 3 above, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.



Those organisations with a valid ISO 27001 certificate, may be considered compliant with the requirements of this area. The observations section shall note "ISO 27001".

n) Penetration testing and vulnerability analysis.

In accordance with section 4.17 of Appendix I of the Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under the Gambling Act 13/2011 of 27 May, the certification body must verify that:

1. In the previous year, the technical gambling system underwent a penetration test and a vulnerability analysis.
2. There is a schedule for a vulnerability analysis on at least a yearly basis.

With regard to requirement 1 above, the certification body shall note in the part for observations the document references and the document headings under which compliance with the requirements is confirmed.