



## Anexo I. Functionality requirements checklist within the scope of the biennial audit (version 2)

### Requirements of general functionality

The following table includes the requirements of general functionality to be verified in all audits of every general licence granted to the operator.

Area	Description	Regulation	Article	Requirement	Auditor's task
Responsible Gambling	Preventive actions for pathological gambling and its activities	OM_PLG	Appendix II. 3.1	d) The interface must not induce the gambler to recoup his/her losses. The operator shall identify gambling attempts arising from the player's impatience by pressing "play" repeatedly while waiting for a response from the system.	The existence of suitable procedure for logging said multiple attempts to gamble and whether there is a documented log of such must be audited.
Contract, Acceptance, copy and amendment	Gambling contract	RD_LIC	Article 31	2. The express acceptance of the gambling contract by the participant shall be made through any valid method under Law. Evidence of such acceptance and its recording shall be the responsibility of the gambling operator in all cases.	The existence of such a contract acceptance register must be verified by the audit.
	Operator responsibilities towards participants	RD_LIC	Article 33	The operator must retain the gambling contract entered into by the player for a period of six years following the cancellation of the user's registration and also adopt all necessary measures for the protection of the participant's data.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.
	Privacy policy	RES_TEC	Appendix I. 2.4.2	Any changes to the privacy policy must be notified to the user and shall also require his/her acceptance.	Verify that all changes to the privacy policy have been notified to the users and that users' acceptance has been received.
User registration and exclusion checks	Storage of a copy of all documents supplied	RES_TEC	Appendix I. 2.1.2	The operator must retain a copy of the documents supplied for identifying the registered participants. The operator shall implement the necessary technical procedures for storing a digital copy of the documents provided by the participants.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Verification services offered by the Directorate General for the Regulation of	RES_TEC	Appendix I. 2.1.4	The operator shall keep a record of all queries made to the identity verification system and record the date and exact time of the query. The data must be stored together with user registration data for the period of the user's registration and the six years subsequent to the cancellation or termination of registration.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.



Area	Description	Regulation	Article	Requirement	Auditor's task
	Gambling	RES_TEC	Appendix I. 2.1.4	The operator shall keep a record of all queries made to the general register of gambling access prohibitions and record the date and exact time of the query. The data must be stored together with user registration data for the period of the user's registration and the six years subsequent to the cancellation or termination of registration.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.
	User registration activation and restriction on participation.	RES_TEC	Appendix I. 2.1.5	The operator shall have a documented procedure for the registration and activation of the user that shall include the identity requirements and the restriction on participation stipulated in articles 26 and 27 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.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 2.1.5	The operator is responsible for the veracity of the data that appears in its user registrations and for the correct identification of the participants in any gambling that it organises or promotes. The operator must furthermore possess a verification service for identity details and dates of birth to ascertain the veracity of registrations. This service may be provided by third parties who supply professional identity verification services.	The existence of a procedure for verifying the data under the terms set forth above must be audited.
		RES_TEC	Appendix I. 2.1.5	Operators must record and store all steps, queries and requests made for verifying the data supplied by applicants, as well as those documents received or used for this purpose. The data must be stored together with user registration data for the period of the user's registration and the six years subsequent to the cancellation or termination of registration.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.
	Periodic review of user registrations	RES_TEC	Appendix I. 2.1.6	The operator shall implement a technical procedure for the periodic review of user registrations under the terms stipulated in article 26.3 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.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Cancellation of user registration	RES_TEC	Appendix I. 2.1.7	The operator shall store the data of cancelled user registrations. The record shall include the time and reasons for the cancellation.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.
	Suspension due to inactivity	RES_TEC	Appendix I. 2.1.8	The operator shall keep a record of user registrations suspended due to inactivity, which shall include the suspension date.	The existence of a record and that it complies with the stipulated requirements of storage and the particular storage periods must be audited.



Area	Description	Regulation	Article	Requirement	Auditor's task
	Fraud prevention measures	RES_TEC	Appendix I. 2.1.9	The operator must have procedures in place for detecting fraud. Procedures shall include the timely reporting of suspicious activities to the relevant public bodies for subsequent investigation.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Register and reporting of precautionary suspension of user registration	RES_TEC	Appendix I. 2.1.9	The operator shall keep a record of suspended users. The register shall include the date and reason for the suspension.	The existence of a record and that it complies with the stipulated requirements of storage and the particular storage periods must be audited.
	Single active user registration	RES_TEC	Appendix I. 2.1.10	The operator shall adopt the necessary procedures and mechanisms for ensuring a single active user registration per participant as required by article 26.2 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.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
Gaming account, amounts paid and collected	Operator responsibilities towards participants	RD_LIC	Article 33	The operator must store, for a period of six years, analytical details of the player's gambling account and of the wagers placed.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.
	Functioning of the gambling account	RES_TEC	Appendix I. 2.2.1	Corrections, cancellations or adjustments shall be recorded under separate entries. Under no circumstances may the original transaction be deleted.	Compliance with the stipulated obligations of storage and the particular storage periods, as well as procedures preventing deletion, cancellation, correction, etc., must be audited.
	Control procedure for deposits from participants	RES_TEC	Appendix I. 2.2.2	A record book shall be kept and updated at least weekly, in which the balance of the funds deposited by the participants into the gambling accounts, as well as the balance of each Spanish current account referred to in article 39 of Royal Decree 1614/2011, the time and date of the verification and the signature of the person appointed by the operator, shall be checked and noted.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 2.2.2	If the balance of the funds deposited by the participants is below that of the current accounts, immediate measures shall be taken to increase the balance in the current accounts and the checking and noting in the record book shall take place again on the following work day.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.



Area	Description	Regulation	Article	Requirement	Auditor's task
	Record	RES_TEC	Appendix I. 2.2.3	The participant may consult in real time a summary of the movements on his/her gambling account, covering at least the calendar year, which includes: the initial balance, total deposited, total withdrawn, total charges for participating in the gambling and for any additional services offered by the operator, total payments for any payments accepted by the participant and for prizes won, and the current balance.	The correct implementation of this obligation should be audited, providing evidence of compliance.
		RES_TEC	Appendix I. 2.2.3	The system shall be designed to allow real-time issuance, following application from the participant, of a document including the information described in the previous paragraph and containing the operator and participant's identification details.	The correct implementation of this obligation should be audited, providing evidence of compliance.
		RES_TEC	Appendix I. 2.2.3	The operator shall have a procedure allowing those users without an active gambling account with the operator at the moment of the query to obtain such information through the operator's user service channels. With regard to the application of the participant, the operator must, subsequent to making the necessary identity verifications, provide the user with the requested document within ten days.	Correct compliance with this obligation must be audited. The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Restriction on transfers between participants	RES_TEC	Appendix I. 2.2.5	The operator shall implement technical procedures required to prevent the transfers between gambling accounts associated with different user registrations.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Accounts associated with user registrations that are not active	RES_TEC	Appendix I. 2.2.7	The operator must have a documented procedure of technical controls and reviews in order to ensure that gambling accounts associated with non-active user records do not make unauthorised movements.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Register of payment and collection transactions	RES_TEC	Appendix I. 2.3.1	The operator must store or be in the position to obtain a detailed statement of every deposit or withdrawal, in addition to all the information associated with each transaction, whether by its own means or that of a third party.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 2.3.1	Where additional pricing services are employed, the operator must store the information relating to the participation price and the identifier of the participated game or competition. The operator must also be in the position to obtain the telephone number and the bank account used in order to bill the player for participating.	Compliance with the stipulated duties of storage and the particular storage periods must be audited.
	Monitoring procedure for payment and collection transactions	RES_TEC	Appendix I. 2.3.3	<p>The operator shall implement a procedure for cross-checking payment and collection transactions with the entries on gambling accounts or gambling software, which shall include at least:</p> <ul style="list-style-type: none"> <li>• Verification that gambling accounts linked with non-active user records are not making unauthorised movements.</li> <li>• Verification that deposited and withdrawn amounts match the transactions carried out through the payment methods.</li> <li>• Verification that participants do not make deposits exceeding the limits established for them.</li> <li>• Verification that withdrawals are ordered within 24 hours, unless there are exceptional reasons that have been notified in advance to the Directorate General for the Regulation of Gambling.</li> </ul> <p>The procedure shall be performed on at least a monthly basis.</p>	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
Deposit limits		RES_TEC	Appendix I. 2.2.8	The operator shall keep a record of the changes to the deposit limits according to user registration. The record shall include the date and reason for the change. It must be recorded whether the change was requested by the player or established by the operator.	Compliance with the stipulated duties of information storage and the particular storage periods must be audited.
		RES_TEC	Appendix I. 2.2.8	The operator must retain the tests, passed by the player, on addictive gambling prevention and on responsible gambling, which are necessary for applying for an increase of deposit amounts or the removal of any limit established on the player's deposits, as well as the historical analysis of the participant's actions in the event of a second application or subsequent requests to raise the limits from the participant.	Compliance with the stipulated duties of information storage and the particular storage periods must be audited.
Records and traceability	Records and logs of the technical gambling system	RES_TEC	Appendix I. 6.1	The operator shall maintain records and logs of all decisions made by the participant, operator, its staff or systems, which may have an impact on game progress, user registration, gambling accounts or payment methods.	Compliance with the stipulated duties of information storage and the particular storage periods must be audited.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 6.1	With regard to game progress data, the data must be able to reconstruct all moves that may have a consequence on its progress. The Technical Gambling System must store all records and logs pertaining to security of the IT systems.	Compliance with the stipulated duties of information storage and the particular storage periods must be audited.
		RES_TEC	Appendix I. 6.1	The Directorate General for the Regulation of Gambling must have online access to the mentioned records and logs for a period no less than twelve months. The operator may be exempted from this requirement, on an exceptional and justified basis, following prior request of authorisation from the Directorate General for the Regulation of Gambling.	Compliance with the stipulated duties of information storage and the particular storage periods must be audited.
		RES_TEC	Appendix I. 6.1	The records and logs must be kept on file for at least 6 years.	Compliance with the stipulated duties of information storage and the particular storage periods must be audited.
		RES_TEC	Appendix I. 6.1	Operators must plan to implement a procedure for recovering such information.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 6.1	Records and logs shall be designed in such a way as to prevent deletion or modification.	The existence of procedures or measures preventing deletion or modification of the records and logs must be audited.
		RES_TEC	Appendix I. 6.1	In the event of the operator having to delete an entry, for example, in order to correct technical errors, such deletion must be approved by the operator and the supporting documentation for the changes must be retained.	Compliance of said procedure with the aforementioned purpose and the duties of information storage must be audited.
		RD_TEC	Article 4.1.a) and c)	The operator must record all gambling actions or transactions made from devices and by users connected to them; transactions and results of betting and lottery events; distribution of prizes; operations made pertaining to user registration and gambling accounts; aggregated and control data; as well as operational incidents of the gambling platform.	A record should be kept of all gambling actions or transactions made from devices and users connected to them; transactions and results of betting and lottery events; distribution of prizes; operations made pertaining to user registration and gambling accounts; aggregated and control data; as well as operational incidents of the gambling platform.
Terminals and user sessions	Terminal identification	RES_TEC	Appendix I. 3.7.1.1	The platform must be capable of identifying the different types and versions of terminals. A record of such identification shall be kept.	Verify that the platform is able to identify the different types and versions of terminals, and keeps records of them.
		RES_TEC	Appendix I. 3.7.1.1	If the terminal is located in physical betting premises, casino or other authorised establishment, the platform must identify the establishment.	For the terminals installed in physical gaming rooms, casino or other establishments where they are authorized, the platform identifies the establishment.



Area	Description	Regulation	Article	Requirement	Auditor's task
	Operation of the terminal	RES_TEC	Appendix I. 3.7.1.2	All transactions carried out through the terminal shall be recorded in the central gambling unit and ascribed to a person who must have provided prior authentication, whether participant, operator, technicians or staff authorised by said operator.	All transactions carried out through the terminal are recorded in the central gambling unit and are ascribed to a person providing prior authentication, whether participant, operator, technicians or staff authorised by said operator.
	Physical terminals of an incidental nature	RES_TEC	Appendix I. 3.7.3.3	Terminal integrity. The terminal must also enter a local record or log, which stores an audit trail for any modification, deletion or reinstallation of an installed software component, as well as any access and attempted access, whether locally or remotely. These records shall be kept on file for at least ninety days. The general requirement of six year storage is not applicable. The technical system shall, on a daily basis at least, check that the terminal's software components are the approved components.	Correct compliance with this obligation must be audited. Compliance with the stipulated duties of recording and information storage and the particular storage periods must be audited.
	User session	RES_TEC	Appendix I. 3.8.2	User session record. The platform shall keep a record of user sessions, detailing the start and end times of the session, authentication methods employed by the user and reason for disconnection or inactivity.	Correct compliance with this obligation must be audited. Compliance with the stipulated duties of recording and information storage and the particular storage periods must be audited.
Communication channels	Gambling websites	RD_TEC	Article 15	2. The operator must establish systems, mechanisms or arrangements for guaranteeing that all gambling activities carried out in Spain or using a Spanish user registration are carried out from the operator's website with the ".es" domain name. In particular, the operator must guarantee that all connections made from the Spanish territory or by participants with Spanish user registrations, which were initially directed to websites with a domain name other than ".es" owned or controlled by the operator, its parent company or subsidiaries, are redirected to the operator's specific ".es" website.	Correct compliance with this obligation must be audited. The correct deployment of this procedure must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Gambling activities through landline or mobile telephone text messaging services.	RD_TEC	Article 17	4. The operator must store recordings for at least a year or until expiration of the prizes related to the gambling activities, whichever is the longest.	Compliance with the stipulated duties of recording and information storage must be audited.
	Redirection to the «.es» domain	RES_TEC	Annex I. 3.2	The operator shall establish procedures and mechanisms to ensure that all connections made from Spain or with a Spanish user registry to a domain that is owned or controlled by the gaming operator, its parent company or its affiliates is directed to a named website Domain name under .es.	The correct implementation of the procedure must be audited, as well as the effective execution of the different tasks assigned to each one of the actors that take part in the procedure. It should be audited that the register associated to the procedure is correctly updated with the corresponding periodicity in your case.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Annex I. 3.2	The operator must implement measures that allow, as far as possible, to detect and avoid connections through network technologies whose purpose is to hide the IP address of the player.	The operator has implemented measures that allow it, as far as possible, to detect and avoid connections through network technologies whose purpose is to hide the player's IP address. A detailed specification of the tools or companies related to this IP routing identification task is requested.
		RES_TEC	Annex I. 3.2	The operator must have a procedure that allows to contrast the geolocation of the player's IP, with his / her country of residence and, if applicable, the means of payment used, in order to detect possible fraud by the player.	The correct implementation of the procedure must be audited, as well as the effective execution of the different tasks assigned to each one of the actors that take part in the procedure. It should be audited that the register associated to the procedure is correctly updated with the corresponding periodicity in your case. A detailed specification of the tools or companies related to this IP geolocation task is requested.
Internal control system (SCI)	Unavailable SCI and suspension of the gambling on offer	RES_TEC	Appendix I. 5.1.8	In the event that the internal control system becomes unavailable, the operator must suspend the gambling on offer. In the case that the storage system is unavailable for 24 hours, the operator may continue the gambling on offer if the capture system remains operable and is capable of recording transactions until the storage system becomes available. The operator shall suspend the gambling on offer where the storage system is unavailable for over 24 hours.	Correct compliance with this obligation must be audited. The correct deployment of the procedure to this effect must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Information quality of the SCI	RES_TEC	Appendix I. 5.1.11	The operator must have a documented control procedure for the data quality of the SCI. This procedure must be performed at least monthly and shall include, as a minimum, the following verifications: <ul style="list-style-type: none"> <li>– That the data includes all participants registered with the operator.</li> <li>– That financial data includes all gambling transactions for the period, consisting of deposits and withdrawals, and that the obtained figures match the official figures of the operator.</li> <li>– That the participant account balances are adequately described in the information of the internal control system.</li> <li>– That the monthly and daily files for the period have been created.</li> </ul>	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.





Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 5.1.11	The operator shall store documentation of previous verification results. Said documentation shall include the date of verifications, the signature of the supervisor on behalf of the operator, the main financial and registered user figures transmitted in the files of the internal control system, as well as their comparison with the operator's official figures.	Compliance with the stipulated duties of recording and information storage must be audited.
	Storage of SCI information	RES_TEC	Appendix I. 5.1.13	The storage system must retain its data for a minimum period of six years.	Compliance with the stipulated duties of recording and information storage and the particular storage periods must be audited.
		RES_TEC	Appendix I. 5.1.13	Gambling operators are obliged to allow and provide the Directorate General for the Regulation of Gambling with online access to information related to the previous twelve months of activity recorded on the storage system.	The existence of a procedure to comply with this obligation must be audited.
		RES_TEC	Appendix I. 5.1.13	Operators must plan to implement a procedure for recovering information related to a period of no less than six years.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.



## Requirements of particular functionality

The following table includes the requirements of particular functionality to be verified in all audits for every specific licence granted to the operator.

Area	Description	Regulation	Article	Requirement	Auditor's task
Return percentage and prize tables	Basic game rules	RES_TEC	Appendix I. 3.1	Operator gambling systems must incorporate procedures necessary for fulfilling the requirements stipulated in every game's basic regulations and in the relevant ministerial order and also, in particular, the established requirements relating to: <ul style="list-style-type: none"> <li>• Particular rules of the game.</li> <li>• Claims by participants.</li> <li>• Duties of informing participants.</li> <li>• Promotion of gambling.</li> <li>• Channels and means of participation.</li> <li>• Objective of the game.</li> <li>• Game participation and restrictions on participating.</li> <li>• Game progress, prize determination and allocation.</li> <li>• Establishment of bets or wagers as well as for cancellation and postponement.</li> <li>• Payment of prizes.</li> </ul>	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 3.1	The operator shall establish a procedure, to be carried out at least on a monthly basis, which shall verify that the operator's gambling on offer is suited to the held licences. It shall also verify that the options and variant of each type of game comply with the current regulations and that the authorised software versions are being used.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 3.1	The operator shall keep a record of active games at all times. The record shall indicate the game, option or variant, where appropriate, commercial name and the authorised version.	A record shall be kept of active games, at any moment, indicating the game, option or variant, where appropriate, commercial name and the authorised version.
	Return percentage to the participant	RES_TEC	Appendix I. 3.3	The operator shall implement a procedure that shall help ensure the proper functioning of the expected return to the participant. It shall verify, at least on a monthly basis, that the return percentage to the participant obtained in any one of the gambling activities, options or variants, coincides with the expected value or ranges.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 3.3	If any serious deviations are detected, the operator must deactivate the affected gambling activities, options or variants, until the problem is discovered and resolved.	For all cases where serious deviations have been detected, the gambling activities must have been deactivated.
		RES_TEC	Appendix I. 3.3	If improper functioning is confirmed, the operator shall notify the Directorate General for the Regulation of Gambling and state the cause, time period, the gamblers and amounts concerned as well as the adopted measures.	The DGOJ must have been informed of all improper functioning.
		RES_TEC	Appendix I. 3.3	In those gambling activities where the return percentage may depend on parameters that are configurable on the technical system, such as prize tables, the operator shall keep a record of all changes to said parameters.	The record of changes to parameters is kept.
	Prize tables	RES_TEC	Appendix I. 3.4	The operator shall keep a record of prize tables for each game so that changes may be audited.	A record of prize tables is kept.
Random number generator (GNA)	GNA authorisation	RES_TEC	Appendix I. 3.5	The GNA fingerprint is the same as that of the latest authorisation report.	Verification of the GNA fingerprint.
	Faults in the GNA	RES_TEC	Appendix I. 3.5.4	The operator must implement a monitoring system for the GNA, thereby allowing detection of its faults, as well as mechanisms disabling the game if there is a fault in the GNA.	There is a monitoring system for the GNA, which allows detection of faults, as well as mechanisms disabling the game on the occurrence of a fault in the GNA, specifying whether the monitoring procedure is performed automatically and in real time, or in retrospective review processes
	GNA reseeding	RES_TEC	Appendix I. 3.5.5	The operator must have a procedure for reseeding the GNA.	The correct implementation of the procedure must be audited, as well as the effective execution of the different tasks assigned to each one of the actors that take part in the procedure. It should be audited that the registry associated to the procedure is correctly updated with the corresponding periodicity in its case, giving a detailed explanation of the software algorithm of resemillado used.
Game logic	Game logic controls	RES_TEC	Appendix I. 3.6.3	The game must be designed in such a way so as to minimise the risk of manipulation. Technical, organisational and procedural measures preventing behaviour that may breach the rules of the game shall be adopted.	For minimising the risk of manipulation, the game is designed so that technical, organisational and procedural measures preventing behaviour that may breach the rules of the game are adopted.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 3.6.3	<p>The operator shall have a documented procedure that details the measures applied to its system for ensuring that:</p> <ul style="list-style-type: none"> <li>• The game progresses in accordance with the rules of the game.</li> <li>• Game data is recorded on the system.</li> <li>• The receipts or identification documents of a bet or stake are protected from any possible alteration.</li> <li>• The system controls the time bets or stakes are made available. Closure of the bet or stake promotion must be in accordance with the provisions of gambling regulations and, in all circumstances, shall be prior to the final action which triggers the result of the game.</li> <li>• The system monitors the established prize fund.</li> <li>• The procedure for deciding winners is functioning correctly, and it does not introduce winners who do not fulfil the reward conditions, nor does it not award those who do fulfil such conditions.</li> <li>• The system shall actually award prizes to participants on the list of winners.</li> <li>• All types of operations occurring during the game, including those for exception handling, system parameter changes, cancellations, manual actions, must be registered on the system along with the relevant audit trail.</li> </ul>	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 3.6.3	Any data modification, alteration or deletion must leave an audit trail, especially when the action has been done manually.	Any data modification, alteration or deletion leaves an audit trail, especially when the action has been done manually.
Records and traceability	Central Gambling Unit requirements	RD_TEC	Article 4.1.a) and c)	The operator must record all gambling actions or transactions made from devices and by users connected to them; transactions and results of betting and lottery events; distribution of prizes; operations made pertaining to user registration and gambling accounts; aggregated and control data; as well as operational incidents of the gambling platform.	A record should be kept of all gambling actions or transactions made from devices and users connected to them; transactions and results of betting and lottery events; distribution of prizes; operations made pertaining to user registration and gambling accounts; aggregated and control data; as well as operational incidents of the gambling platform.
	Records and logs of the technical gambling system	RES_TEC	Appendix I. 6.1	The operator shall maintain records and logs of all decisions made by the participant, operator, its staff or systems, which may have an impact on game progress, user registration, gambling accounts or payment methods.	Records and logs of all decisions of the participant and those of the operator, its staff or systems, which may have an impact on game progression, user registration, gambling accounts or payment methods, shall be recorded.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 6.1	With regard to game progress data, the data must be able to reconstruct all moves that may have a consequence on its progress.	Recorded game progress data allows the reconstruction of all moves having a consequence on its progress.
		RES_TEC	Appendix I. 6.1	The Technical Gambling System must store records and logs on the security of IT systems.	The Technical Gambling System stores records and logs on the security of IT systems.
		RES_TEC	Appendix I. 6.1	The records and logs must be kept on file for at least 6 years.	The records and logs are kept on file for at least 6 years.
		RES_TEC	Appendix I. 6.1	Operators must plan to implement a procedure for recovering such information.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 6.1	Records and logs shall be designed in such a way as to prevent deletion or modification.	Verify that the design prevents any deletion or modification of the records and logs.
		RES_TEC	Appendix I. 6.1	In the event of the operator having to delete an entry, for example, in order to correct technical errors, such deletion must be approved by the operator and the supporting documentation for the changes must be retained.	Verify that all deletions by the operator have been duly approved and the supporting documentation for the changes are stored.
Terminals and user sessions	Terminal identification	RES_TEC	Appendix I. 3.7.1.1	The platform must be capable of identifying the different types and versions of terminals. A record of such identification shall be kept.	Verify that the platform is capable of identifying the different types and versions of terminals and a record of such identification is maintained.
		RES_TEC	Appendix I. 3.7.1.1	The platform must record if the participant is using a specific solution provided for mobile devices, except in cases of duly justified technical reasons.	A register indicating whether the participant is using a specific solution provided for mobile devices is maintained.
		RES_TEC	Appendix I. 3.7.1.1	If the terminal is located in physical betting premises, casino or other authorised establishment, the platform must identify the establishment.	The platform identifies the establishment for terminals located in a betting premises, casino or other authorised establishment.
	Operation of the terminal	RES_TEC	Appendix I. 3.7.1.2	All transactions carried out through the terminal shall be recorded in the central gambling unit and ascribed to a person who must have provided prior authentication, whether participant, operator, technicians or staff authorised by said operator.	All transactions carried out through the terminal are recorded in the central gambling unit and are ascribed to a person providing prior authentication, whether participant, operator, technicians or staff authorised by said operator.
		RES_TEC	Appendix I. 3.7.1.2	The records shall allow the transactions made from each terminal to be identified.	The records allow the transactions made from each terminal to be identified.



Area	Description	Regulation	Article	Requirement	Auditor's task
	Terminal integrity	RES_TEC	Appendix I. 3.7.3.3	The terminal must also enter a local record or log, which stores an audit trail for any modification, deletion or reinstallation of an installed software component, as well as any access and attempted access, whether locally or remotely.	The terminal creates a local record or log, which stores an audit trail for any modification, deletion or reinstallation of an installed software component, as well as any access and attempted access, whether locally or remotely.
		RES_TEC	Appendix I. 3.7.3.3	These records shall be kept on file for at least ninety days. The general requirement of six year storage is not applicable.	The records are stored for at least ninety days.
		RES_TEC	Appendix I. 3.7.3.3	The technical system shall, on a daily basis at least, check that the terminal's software components are the approved components.	On a daily basis at least, the technical system checks that the terminal's software components are the approved components.
	User session record	RES_TEC	Appendix I. 3.8.2	The platform shall keep a record of user sessions, detailing the start and end times of the session, authentication methods employed by the user and reason for disconnection or inactivity.	The platform keeps a record of user sessions, which describes the start and end times of the session, authentication methods employed by the user and reason for disconnection or inactivity.
		RES_TEC	Appendix I. 3.8.2	If the terminal belongs to the user, the platform shall allow identification, if technically possible, of the type of device (computer, smartphone or other), the application/version used (browser or actual application), and the IP address where appropriate.	If the terminal belongs to the user, the platform identifies, if technically possible, the type of device (computer, smartphone or other), the application/version used (browser or actual application), and the IP address where appropriate.
		RES_TEC	Appendix I. 3.8.2	If the terminal belongs to an operator, it shall allow identification of the type and version of the terminal as well as the actual terminal if technically possible.	If the terminal belongs to an operator, it identifies the type and version of the terminal as well as the actual terminal if technically possible.
Communication channels	Gambling activities through landline or mobile telephone text messaging services.	RD_TEC	Article 16	2. Communications between participants and the operator shall be recorded in a database using the formats that the Directorate General for the Regulation of Gambling may establish. The Directorate General for the Regulation of Gambling may, at any time, access the database storing the communications.	Communications between participants and the operator are recorded in a database using the formats established by the Directorate General for the Regulation of Gambling. (At the time of publication of this guide, the format has not been published.) The Directorate General for the Regulation of Gambling can, at any time, access the database storing the communications.
	Gambling activities through voice communication services.	RD_TEC	Article 17	1. Operators who organise, operate or promote gambling activities that employ voice communication services, whether primarily or additionally, as a means of participation or interaction must implement an internal control system allowing the capture and recording of communications between the participants and operator.	Operators who organise, operate or promote gambling activities that employ voice communication services, whether primarily or additionally, as a means of participation or interaction have implemented an internal control system allowing the capture and recording of communications between the participants and operator.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RD_TEC	Article 17	3. Voice communications between participants and the operator shall be recorded and registered in a database using the formats and method that the Directorate General for the Regulation of Gambling may establish. The recordings shall allow the time and date of the communication to be correctly determined. The Directorate General for the Regulation of Gambling may, at any time, access the database storing the oral recordings.	Voice communications between participants and the operator are recorded and registered in a database using the formats and method established by the Directorate General for the Regulation of Gambling. The recordings allow the time and date of the communication to be correctly determined. The Directorate General for the Regulation of Gambling can, at any time, access the database storing the voice recordings.
		RD_TEC	Article 17	4. The operator must store recordings for at least a year or until expiration of the prizes related to the gambling activities, whichever is the longest.	The operator stores recordings for at least a year or until expiration of the prizes related to the gambling activities, whichever is the longest.
	Gambling activities through audio-visual communications	RD_TEC	Article 18	Operators who organise, operate or promote gambling activities through audio-visual communication must implement an internal control system allowing the capture and recording of communications between the participants and operator.	Operators who organise, operate or promote gambling activities through audio-visual communication have implemented an internal control system allowing the capture and recording of communications between the participants and operator.
Behaviour in relation to technical faults	Game or user session disabling	RES_TEC	Appendix I. 3.11	The platform must allow under exceptional circumstances the possibility to disable a game in its totality, or particular user sessions, and record the actions and their reasons for subsequent review.	When exceptional circumstances occurred, a complete game, or particular user sessions, was disabled and the actions and their reasons were recorded for subsequent review.
	Incomplete games	RES_TEC	Appendix I. 3.12	In the event of an incomplete game, the particular rules of the game shall decide the platform's action, which may be to wait for a participant, cancel the game or continue as if the game were complete. <ul style="list-style-type: none"> <li>• If the incomplete game is due to a user's terminal losing connection, the platform shall show the game as incomplete when the participant reconnects.</li> <li>• The operator must have a documented procedure for managing the downtime of one, several or all components and which includes associated technical measures. The components must run a self-diagnostic, a critical file check and an inter-component communication check.</li> <li>• Following recovery, the technical gambling system must handle the on-going games affected by the interruption.</li> </ul>	Verify that the particular rules of the game were applied during incomplete games.



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 3.12	The technical system shall keep a record of service interruptions, with details on its time, duration and affected services for later review.	The technical system keeps a record of service interruptions, with details on its time, duration and affected services. A review is later performed on all identified service interruptions.
Real-time gambling		RES_TEC	Appendix I. 3.19	There must be procedures for actions on resolving incidents that may occur during real-time gambling operations.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 3.19	Automatic devices used for recognition and registration must be equipped with an option of manual operability which allows correction of any erroneous result.	Automatic devices used for recognition and registration are equipped with an option of manual operability which allows correction of any erroneous result.
		RES_TEC	Appendix I. 3.19	Every time the manual operability option is activated, it must leave evidence of such for a subsequent review.	Every time the manual operability option had been activated, it left evidence of such for a subsequent review. Reviews were subsequently carried out on the activation of the manual operability option.
		RES_TEC	Appendix I. 3.19	There must be procedures for dealing with game interruptions caused by lapses in the flow of data, video and voice.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
Various features	Virtual players used by participants	RES_TEC	Appendix I. 3.15.2	Participants must have a mechanism for reporting the existence of a possible virtual player.	Participants have a mechanism for reporting the existence of a possible virtual player.
		RES_TEC	Appendix I. 3.15.2	The operator shall have procedures for detecting the use of artificial intelligence methods by a participant.	The correct implementation of the procedures, as well as the effective performance of the different tasks assigned to each person taking part in the procedures must be audited. The record associated with the procedures and its correct and regular updating must be audited.
	Gambling through delayed communication channels	RES_TEC	Appendix I. 3.21	The operator shall adopt the necessary technical, security and organisational measures for preventing that neither the operator, nor its staff, nor participants obtain any advantage resulting from prior knowledge, whether partial or otherwise, of the elements that may determine the result.	The operator has adopted the necessary technical, security and organisational measures for preventing that neither the operator, nor its staff, nor participants obtain any advantage resulting from prior knowledge, whether partial or otherwise, of the elements that may determine the result.





Area	Description	Regulation	Article	Requirement	Auditor's task
Roll-over jackpots	Jackpots, progressive jackpots and additional prizes	RES_TEC	Appendix I. 3.20	<p>The operator's system shall maintain an account linked to the management of jackpots, thereby allowing control of the jackpots and identifying at the very least:</p> <ul style="list-style-type: none"> <li>– The creation of each jackpot.</li> <li>– The time periods during which each jackpot has been active.</li> <li>– The configurable features active at any time for the jackpot.</li> <li>– The games or machines allowing participation or contributing at any time to the jackpot.</li> <li>– The jackpot's balance at all times, and the contributions to it from every type of game or machine.</li> <li>– The prizes awarded on the basis of the jackpot, describing the winner, amount and time of award.</li> <li>– The record of manual actions affecting the jackpot's balance.</li> <li>– The transfer or redirection to another jackpot.</li> <li>– The close of a jackpot or the moment it was cancelled.</li> </ul>	<p>Accounting linked to the management of jackpots is conducted, thereby allowing control of the jackpots and identifying at the very least:</p> <ul style="list-style-type: none"> <li>– The creation of each jackpot.</li> <li>– The time periods during which each jackpot has been active.</li> <li>– The configurable features active at any time for the jackpot.</li> <li>– The games or machines allowing participation or contributing at any time to the jackpot.</li> <li>– The jackpot's balance at all times, and the contributions to it from every type of game or machine.</li> <li>– The prizes awarded on the basis of the jackpot, describing the winner, amount and time of award.</li> <li>– The record of manual actions affecting the jackpot's balance.</li> <li>– The transfer or redirection to another jackpot.</li> <li>– The close of a jackpot or the moment it was cancelled.</li> </ul>
		RES_TEC	Appendix I. 3.20	<p>The operator must have a procedure providing control over the jackpots and ensuring that the jackpot is created, managed and awarded in accordance with the rules of the game.</p>	<p>The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.</p>



Area	Description	Regulation	Article	Requirement	Auditor's task
		RES_TEC	Appendix I. 3.20	<p>On at least a monthly basis, the operator must check:</p> <ul style="list-style-type: none"><li>• The proper functioning, balances and movements of the jackpots.</li><li>• That once the jackpot has been created and opened, the conditions do not change until the jackpot has been won by one or several participants and the amount paid out.</li><li>• That the procedure for deciding winners is functioning correctly. The procedure must not introduce winners who do not fulfil the reward conditions, nor must it not award those who do fulfil such conditions.</li><li>• That the system awards prizes to participants on the list of winners.</li><li>• If applicable, special attention shall be placed on systems redirecting a jackpot where part of the accumulated jackpot is redirected to another fund and may be won later. The system redirecting a jackpot may not be used as a means to postpone indefinitely the awarding of a prize.</li></ul>	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
Internal control system (SCI)	Unavailable SCI and suspension of the gambling on offer	RES_TEC	Appendix I. 5.1.8	<p>In the event that the internal control system becomes unavailable, the operator must suspend the gambling on offer</p> <p>In the case that the storage system is unavailable for 24 hours, the operator may continue the gambling on offer if the capture system remains operable and is capable of recording transactions until the storage system becomes available. The operator shall suspend the gambling on offer where the storage system is unavailable for over 24 hours.</p>	In the case where the internal control system had been unavailable, the gambling on offer was suspended.



Area	Description	Regulation	Article	Requirement	Auditor's task
	Information quality of the SCI	RES_TEC	Appendix I. 5.1.11	The operator must have a documented control procedure for the data quality of the SCI. This procedure must be performed at least monthly and shall include, as a minimum, the following verifications: – That the data includes all participants registered with the operator. – That financial data includes all gambling transactions for the period, consisting of deposits and withdrawals, and that the obtained figures match the official figures of the operator. – That the participant account balances are adequately described in the information of the internal control system. – That the monthly and daily files for the period have been created.	The correct implementation of the procedure, as well as the effective performance of the different tasks assigned to each person taking part in the procedure, must be audited. The record associated with the procedures and its correct and regular updating must be audited.
		RES_TEC	Appendix I. 5.1.11	The operator shall store documentation of previous verification results. Said documentation shall include the date of verifications, the signature of the supervisor on behalf of the operator, the main financial and registered user figures transmitted in the files of the internal control system, as well as their comparison with the operator's official figures.	Documentation of the verification on controls for SCI data quality is stored. Said documentation includes the date of verifications, the signature of the supervisor on behalf of the operator, the main financial and registered user figures transmitted in the files of the internal control system, as well as their comparison with the operator's official numbers.
		RES_TEC	Appendix I. 5.1.11	The operator must be prepared to rectify incorrect data within one month by means of new extractions.	The operator is prepared to rectify incorrect data within one month by means of new extractions.
Record of session configurations for online slot-machine gambling		RES_TEC	Appendix I. 2.1.14	In relation to online slot machines, operators must record and store data on the user's configurations for each one of the user's slot machine gambling sessions, pursuant to article 14 of the Order HAP/1370/2014 of 25 July, which enacts the basic regulation for slot machine gambling.	In relation to online slot machines, operators record and store data on the user's configurations for each one of the user's slot machine gambling sessions, pursuant to article 14 of the Order HAP/1370/2014 of 25 July, which enacts the basic regulation for slot machine gambling.