



# iTech Labs Online Gaming Certification Scheme-DK

## Introduction

The Danish Gambling Authority requires that processes related to online gambling systems, gambling equipment and gambling business systems of the licence holder are certified against Danish Gambling Authority's Spillemyndigheden's certification programme by certification bodies, which operate under ISO/IEC 17025:2017, ISO/IEC 17020:2012 and ISO /IEC 17065:2012.

Spillemyndigheden's certification programme has specified the accreditation ISO/IEC 17065:2012: Requirements for bodies certifying processes for certification of Information security management system (SCP.03.00) and Change management programme (SCP.06.00).

iTech Global Pty Ltd (trading as iTech Labs) incorporated in Australia, is an industry leading testing company, specialising in independent compliance testing for Online Gaming Systems around the world. iTech Labs holds accreditations for ISO/IEC 17025:2017 and ISO/IEC 17020:2012. iTech Global Pty Ltd is the legally responsible entity for the certification activities of iTech Labs.

iTech Labs has the responsibility to provide impartial processes certification work to online operators and manufacturers for the Danish Gambling Authority with competence and integrity. Final certification decisions are made by the iTech Labs Certification Committee.

iTech Labs is responsible for the management of all information obtained or created during the certification activities. At all times, personnel involved in the certification activities, treat all acquired information as confidential and private. This is in accordance with iTech Labs' employment contracts, and Non-Disclosure agreements with customers.

This document is designed to provide comprehensive information for users of the iTech Labs Online Gaming Certification Scheme-DK for certification against Spillemyndigheden's certification programme components - Information security management system (SCP.03.00) and Change management programme (SCP.06.00).

## Key Terms and Definitions used (not exhaustive)

<p><b>Gambling system:</b> Electronic or other equipment used by or on behalf of the licence holder for offering, executing, and operating games including equipment that:</p> <ol style="list-style-type: none"><li>1. is used for the storage of information pertaining to a person's participation in gambling, including historical data and information concerning results,</li><li>2. produce and/or presents games to the gambler, or</li><li>3. determine the result of a game or calculate whether the gambler has won or lost a game.</li></ol>
<p><b>Gambling equipment:</b> Physical equipment used for executing and presenting games, including roulette wheels, slot machines, card shufflers and dealer shoes etc.</p>
<p><b>Business system:</b> Electronic or other equipment used by or on behalf of the licence holder to support the offering of gambling without being a part of the gambling system.</p>
<p><b>Business processes:</b> Described processes of the licence holders associated with the gambling system, business system and data contained in either. This can be described using formal management systems such as ISO / IEC 27001.</p>
<p><b>Certification requirement:</b> a specified requirement, including a requirement that relates directly to a product, service or process specified in standards or in other normative documents and identified by the certification scheme, that is fulfilled by the client as a condition of establishing or maintaining certification.</p>
<p><b>Certification Scheme:</b> a certification system related to specified products, service and/or process to which the same specified requirements, specific rules and procedures apply (the rules, procedures and management for implementing a product, process and service certification are stipulated by the certification scheme - Clause 3.9, ISO 17065:2012).</p>



**Scheme Type 6:** This scheme is mainly applicable to certification of processes.

Although services are considered as being generally intangible, the determination activities are not limited to the evaluation of intangible elements (e.g. effectiveness of an organization's procedures, delays and responsiveness of the management). In some situations, the tangible elements of a service can support the evidence of conformity indicated by the assessment of processes, resources and controls involved. For example, inspection of the cleanliness of vehicles for the quality of public transportation.

As far as processes are concerned, the situation is very similar. For example, the determination activities for welding processes can include testing and inspection of samples of the resultant welds, if applicable.

For both services and processes, the surveillance part of this scheme should include periodic audits of the management system and periodic assessment of the service or process.

**Conformity Assessment:** demonstration that specified requirements (regulations, standards, and technical specifications) are fulfilled.

**Surveillance:** systematic iteration of conformity assessment activities as a basis for maintaining the validity of the statement of conformity.

**Sampling** – selection and/or collection of material or data regarding an object of conformity assessments process, service, data, design, or any combination thereof.

## Scope and requirements of iTech Labs Online Gaming Certification scheme-DK

The scope of the iTech Labs Online Gaming Certification scheme-DK is the certification of processes related to Information security management system (SCP.03.00) and Change management programme (SCP.06.00) according to Spillemyndigheden's certification programme.

iTech Labs is the owner of the iTech Labs Online Gaming Certification scheme-DK.

The scheme is bound to be followed by iTech Labs as a Certification body and all client organisations (Online Gaming Operators and Manufacturers) that have a certification agreement with iTech Labs or that has applied for one.

The iTech Labs Online Gaming Certification scheme-DK was developed in recognition of the iTech Labs Certification Body's (henceforth referred as 'iTech Labs') responsibility in providing process certification to online operators and manufacturers for the Danish Gambling Authority.

The objectives of the iTech Labs Gaming Certification Scheme-DK are:

- to address the needs of all interested parties (online gaming operators, online gaming manufacturers, and regulators) by providing confidence regarding the fulfilment of applicable standards.
- to demonstrate to the Gambling market that the components of Information security management system and Change management programme have been attested by an impartial third party body- iTech Labs to fulfill the Spillemyndigheden's certification programme requirements specified by the Danish Gambling Authority.
- to add value to online operator's and manufacturer's processes by providing certifications for the Danish Gambling Authority.

The iTech Labs Online Gaming Certification scheme-DK is classified as a type 6 and it was prepared based on the guidelines given in ISO/IEC 17067, to comply with the requirements of ISO/IEC 17065.

In this scheme, the processes of the Online gaming systems (and/or their components) related to Information security management system (SCP.03.00) and Change management programme (SCP.06.00) are subject to determination activities. A certificate of conformity or other statement of conformity (e.g., a letter) is issued for the processes related to Information security management system (SCP.03.00) and Change management programme (SCP.06.00), the characteristics of which are detailed in the certificate, or a document referred to in the certificate. Surveillance of certification processes is part of the scheme and requires periodic audits of the management system processes. Subsequent production processes are not covered by iTech Labs attestation of conformity.

	<b>Conformity assessment functions and activities within the process certification scheme</b>	<b>Type 6 Certification Scheme (x-in scope, N/A- not in scope)</b>
<b>I</b>	<b>Selection</b> , including planning and preparation activities, specification of requirements, e.g. normative documents, and sampling, as applicable	<b>x-in scope</b>
<b>II</b>	<b>Determination of characteristics</b> , as applicable, by: a) testing b) inspection c) design appraisal d) assessment of services or processes e) other determination activities, e.g. verification	<b>x-in scope</b>
<b>III</b>	<b>Review</b> Examining the evidence of conformity obtained during the determination stage, to establish whether the specified requirements have been met	<b>x-in scope</b>
<b>IV</b>	<b>Decision on certification</b> Granting, maintaining, extending, reducing, suspending, and withdrawing certification	<b>x-in scope</b>
<b>V</b>	<b>Attestation, licensing</b> a) issuing a certificate of conformity or other statement of conformity (attestation)	<b>x-in scope</b>
	b) granting the right to use certificates or other statements of conformity	<b>x-in scope</b>
	c) issuing a certificate of conformity for a batch of products	N/A- not in scope
	d) granting the right to use marks of conformity (licensing), based on surveillance (VI) or certification of a batch.	<b>x-in scope</b>
<b>VI</b>	<b>Surveillance, as applicable (see 5.3.4 to 5.3.8 of ISO17065:2012), by:</b> a) testing or inspection of samples from the open market	N/A- not in scope
	b) testing or inspection of samples from the factory	N/A- not in scope
	c) assessment of the production, the delivery of the service or the operation of the process	<b>x-in scope</b>
	d) management system audits, combined with random tests or inspections	<b>x-in scope</b>

iTech Labs will perform all evaluation, inspection or certification activities in accordance with the requirements of the following applicable standards and normative documents:

- ISO/IEC 17020:2012 Conformity Assessment – requirements for the operation of various types of bodies performing inspection
- ISO/IEC 17025:2017 Conformity Assessment – requirements for Testing and calibration laboratories
- ISO/IEC 17065:2012 Conformity Assessment – Requirements for the bodies certifying product, process and services
- ISO 17067:2013 Conformity Assessment – Fundamentals of product certification and guidance for product certification schemes
- ISO 17000:2004 Conformity Assessment – Vocabulary and General principles
- Danish Gambling Authority’s jurisdictional requirements as specified in the Spillemyndigheden’s



certification programme:

- SCP.00.00.EN.2.0 - General requirements.pdf and SCP.00.00.DK.2.0 - General requirements.pdf, January 1, 2023
- SCP.03.00.EN.2.0 - Information Security Management System.pdf and SCP.03.00.DK.2.0 - Information Security Management System.pdf, January 1, 2023
- SCP.06.00.EN.2.0 - Change Management Programme.pdf and SCP.06.00.DK.2.0 - Change Management Programme.pdf, January 1, 2023

The Danish Gambling Authority has published on their website Spillemyndigheden’s certification programme, which consists of several documents. Each document sets out minimum requirements for the gambling system, gambling equipment, business processes and business systems of the licence holder.

**iTech Labs Online Gaming Certification Scheme - DK requirements**

- Process requirements for the online gambling systems, gambling equipment, business processes and business systems (and their components) as per the Danish Gambling Authority’s jurisdictional requirements as specified in the Spillemyndigheden’s certification programme

<b><i>Type of online gambling systems, gambling equipment, business processes and business systems (and their components) processes in scope of the scheme:</i></b>	<b><i>Spillemyndigheden’s certification programme Documents</i></b>
Information security management system processes that ensures the protection of the gambling system and business systems against threats and secure sensitive information stored in the systems. The Information security management system is applicable for offering of: <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> <li>• Lotteries</li> </ul>	SCP.03.00.EN.2.0 - Information Security Management System.pdf SCP.03.00.DK.2.0 - Information Security Management System.pdf
Change Management Programme processes that ensures that all changes to the gambling system are conducted according to the standards, ensuring an adequate quality for the implementation of changes. The Change Management Programme is applicable for offering of: <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> <li>• Lotteries</li> </ul>	SCP.06.00.EN.2.0 - Change Management Programme.pdf SCP.06.00.DK.2.0 - Change Management Programme.pdf

- Other Requirements to be fulfilled by the Clients organisations (Online Gaming Operators and Manufacturers):
  - Signing a certification agreement
  - Meeting arrangements for the selection and sampling process, testing, assessment, and auditing.
  - Payment of necessary fees.
  - Signing an agreement for the use of certification documents.
  - Providing processes information throughout the certification period and after certification as needed.



## Sampling

In accordance with the characteristics of the type of processes to be certified, sampling may be used (as indicated):

<b><i>Type of online gambling systems, gambling equipment, business processes and business systems (and their components) processes in scope of the scheme:</i></b>	<b><i>Determination method and Sampling used</i></b>
Information security management system processes that ensure the protection of the gambling system and business systems against threats and secure sensitive information stored in the systems. The Information security management system is applicable for offering of: <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> <li>• Lotteries</li> </ul>	Documentation review, Assessment of implementation; sampling of specific event handling e.g. for detailed review of firewall logs, or of security alerts; if there are different classes of alert or process, choose a sample from each.
Change Management Programme processes that ensures that all changes to the gambling system are conducted according to the standards, ensuring an adequate quality for the implementation of changes. The Change Management Programme is applicable for offering of: <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> <li>• Lotteries</li> </ul>	Documentation review, Assessment of changes, and effects on linked components; inspection of unchanged components to confirm this; verification of versions and checksums at each baseline; assess whether documented changes in the period match the record of actual change to the system. Depending on the component affected by the changes, sampling is done for processes affected ensuring that each change is tested on at least one affected component.

## Duties and Responsibilities

Impartiality is one of the core values of iTech Labs in performing testing and certification activities. iTech Labs' top management and staff understand and adhere to iTech Labs' Impartiality Policy and procedures, in carrying out all activities related to testing and certification. To preserve objectivity, iTech Labs manages any conflict of interest and any potential conflict of interest for existing and new clients.

Decisions related to certification, are not influenced by any conflict of interest or activities of internal and/or external parties and are solely based on conformity evidence and facts.

iTech Labs has tools for managing risks to impartiality, and Declarations of personnel conflicts of interest, Annual Impartiality Declarations, and Annual Management Reviews.

Liability is limited to iTech Labs' assets and staff (both permanent and contract). The amount of iTech Labs insurance for general liability and professional liability ensures there is appropriate cover for the provided testing and certification services.

iTech Labs evaluates and monitors finances and sources of income monthly and quarterly. iTech Labs is highly profitable and has been growing strongly in recent years. These evaluations ensure that commercial, financial, and other pressures do not compromise the provision of impartial testing and certification services.

All certification applicants are treated fairly, and in accordance with the requirements outlined in ISO/IEC 17065:2012. By following internally developed procedures and policies, based on the standards defined in the scheme, iTech Labs ensures that the certification process does not depend on applicants' size, membership or any previous number of certifications held by the applicant. iTech Labs does not discriminate against any applicant for certification, whose activities fall within the scope of the iTech Labs Online Gaming Certification Scheme-DK. Fees for certification are clearly and transparently shown in the proposal (agreement).

As required in accordance with our ISO/IEC 17025:2017 accreditation, iTech Labs has processes for the



determination of competence criteria and competence evaluation, to ensure that all categories of personnel involved throughout the certification activities demonstrate knowledge and skills, as required, in their areas of responsibility. A Skills matrix is maintained for all personnel involved in the evaluation. iTech Labs has documented processes for the initial competence evaluation, as well as ongoing monitoring of competence and performance, of all personnel involved in the certification activities.

## Certification Process

iTech Lab certification process is based on ISO /IEC 17067 and guidelines for product / processes certification schemes. The certification process ensures that product / processes are certified in compliance with the relevant applicable requirements as defined in the scope of the scheme.

### ➤ Selection

Selection involves planning and preparation activities, to collect or produce all the information and input needed for the subsequent **determination** function.

- **Application for certification and certification agreement**

On receipt of a request, regarding certification against ISO/IEC 17065:2012, iTech Labs will forward the 'ITL\_IID Initial Information Document' & 'ITL-KYC Know Your Customer' for completion by the client applying for certification.

The client makes an application to iTech Labs for certification of processes of the Online gaming systems (and/or their components) related to Information security management system (SCP.03.00) and Change management programme (SCP.06.00). The application provides iTech Labs with all necessary information to enable it to plan the evaluation and certification process.

**Client and Processes information** to be submitted\* must include the following:

Information regarding the client requiring certification	This includes: <ul style="list-style-type: none"> <li>• Legal name of the applicant, address of its registered office, contact details</li> <li>• Relationship to parent company (if applicable)</li> <li>• Name and function of the person acting as contact to the certification body and authorized to sign on behalf of the applicant</li> <li>• Business address</li> <li>• Role of applicant organization (manufacturer, operator, etc.)</li> <li>• Information on any outsourced process used by the client that may have an impact on conformity</li> </ul>
Information regarding intended certificate holder	Similar detail as the client are needed only if different from client.
Designation of Processes for which certification is requested	This includes: <ul style="list-style-type: none"> <li>• List of processes related to Information security management system (SCP.03.00) and Change management programme (SCP.06.00) and quantity</li> <li>• Description of processes related to Information security management system (SCP.03.00) and Change management programme (SCP.06.00), including descriptive identifier(s), name, versions, period applicable to</li> <li>• Jurisdictional standard(s) and other normative document(s) to which certification is requested: number, title, year of issue</li> </ul>
Manufacturer of processes	Similar detail as the client needed only if different from client.



Certification and licensing agreements	Declaration of willingness, on satisfactory completion of evaluation, to conclude the applicable certification agreement and licensing agreement, if not previously concluded.
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\* The above information is to be submitted using the form 'ITL\_IID Initial Information' & 'ITL-KYC Know Your Customer'.

Based on the information received, there may be further clarification required, to enable the preparation of the certification agreement. If the information provided is not clear or sufficient, iTech Labs will ask clarifying questions (via email or during meeting).

- **Application review**

iTech Labs conducts a review on the information obtained, to ensure that:

- ✓ the provided client and process information is sufficient for the certification agreement;
- ✓ there are no differences in understanding between the client and iTech Labs, regarding standards or any other normative documents;
- ✓ The certification scope is clear and defined;
- ✓ iTech Labs has sufficient and appropriate means, competence, and capacity, to perform all required certification activities.

- **Certification Agreement**

On completion of the review, iTech Labs notifies the client whether the information provided is satisfactory, and if so, provides a proposal for certification (certification agreement). The proposal will include scope of evaluation, applicable jurisdictional standards, submission requirements, proposed schedule, reporting during the valuation, deliverables, price, payment terms and terms & conditions. The agreement with the client is generally fixed price agreements, no additional cost is involved for the additional evaluation required after resolution of non-conformances. In case of specific projects where additional cost is involved, this will be specified in the proposal including payments terms.

iTech Labs is using proposals with each client as legally enforceable agreements for the provision of certification activities, in accordance with the relevant requirements. The proposals are binding contracts and are signed by both iTech Labs and the client. The period of validity of the agreement is specified in the proposal's Terms and Conditions. The proposal takes into account the responsibilities of iTech Labs and its clients.

iTech Labs reserves the right for its decisions, relating to: the granting, refusal, and maintaining of certification; the expansion or reduction of the scope of certification; the renewal, suspension, or restoration following suspension; or the withdrawal of certification. By signing the agreement, the customer agrees to follow and comply with iTech Labs' certification agreement, the Terms and Conditions, and rules.

## ➤ **Determination**

During this function, iTech Labs gather information to determine the extent to which the client demonstrates its fulfilment of certification requirements.

### **Submission required for Determination (Evaluation):**

<b>Type of processes</b>	<b>Required submission:</b>
Information security management system processes that ensure the protection of the gambling system and business systems against threats and secure sensitive information stored in the systems. The Information security management system is applicable for offering of: <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> </ul>	If the licence holder <b>is certified</b> in accordance with a valid ISO/IEC 27001:  <b>Initial Review/Certification:</b> Documentation for the combined scope of the license holder and supplier's ISO/IEC 27001 certifications encompassing the entire gambling system as defined in the Danish legislation, as well as any process related to the gambling system and all physical locations of the gambling system: <ul style="list-style-type: none"> <li>• Valid ISO/IEC 27001 Accreditation/Certification,</li> <li>• Statement of Applicability, and</li> </ul>



<b>Type of processes</b>	<b>Required submission:</b>
<ul style="list-style-type: none"> <li>• Lotteries</li> </ul>	<ul style="list-style-type: none"> <li>• Risk assessment.</li> </ul> <p>If the licence holder <b>is not certified</b> in accordance with a valid ISO/IEC 27001:</p> <p><b>Initial Review/Certification:</b> Documentation on the operation, procedures and policies used in operation, related to:</p> <ul style="list-style-type: none"> <li>• Information systems security of gambling system and business systems <ul style="list-style-type: none"> <li>➢ electronic systems that record, store, process, share, transmit or retrieve sensitive customer information, eg credit/debit card details, authentication information, customer account balances;</li> <li>➢ electronic systems that generate, transmit, or process random numbers used to determine the outcome of games or virtual events</li> <li>➢ electronic systems that store results or the current state of a customer’s gambling history</li> <li>➢ points of entry to and exit from the above systems (other systems that are able to communicate directly with core critical systems)</li> <li>➢ communication networks that transmit sensitive customer information</li> </ul> </li> <li>• Network diagram</li> <li>• Details of personnel access to the gambling system and the business systems</li> <li>• List of suppliers, supplier agreements</li> <li>• Evidence of implementation</li> <li>• Suppliers Information security management system Certification reports</li> </ul> <p><b>Renewed Certification:</b> Documentation with details of any changes since previous review on the operation, procedures and policies used in operation, related to:</p> <ul style="list-style-type: none"> <li>• Information systems security of gambling system and business systems <ul style="list-style-type: none"> <li>➢ electronic systems that record, store, process, share, transmit or retrieve sensitive customer information, eg credit/debit card details, authentication information, customer account balances;</li> <li>➢ electronic systems that generate, transmit, or process random numbers used to determine the outcome of games or virtual events</li> <li>➢ electronic systems that store results or the current state of a customer’s gambling history</li> <li>➢ points of entry to and exit from the above systems (other systems that are able to communicate directly with core critical systems)</li> <li>➢ communication networks that transmit sensitive customer information</li> </ul> </li> <li>• Network diagram</li> <li>• Evidence of implementation changes</li> <li>• Details of change in personnel since last review (people that left or joined)</li> <li>• Details of any changes to software used</li> <li>• Details of any changes to company structure, physical presence or business model (if any).</li> <li>• Details of any changes in supplier agreements</li> </ul>



<b>Type of processes</b>	<b>Required submission:</b>
	<ul style="list-style-type: none"> <li>• Details of current status/conformity for any observations and non-conformities from the last audits.</li> <li>• Suppliers Information security management system Certification reports</li> <li>• Previous certification report.</li> </ul>
<p>Change Management Programme processes that ensures that all changes to the gambling system are conducted according to the standards, ensuring an adequate quality for the implementation of changes. The Change Management Programme is applicable for offering of:</p> <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> <li>• Lotteries</li> </ul>	<p><b>Initial Review / Certification:</b> Documentation on the operation, procedures and policies used in operation, related to the clients Change Management Framework for managing changes to the gambling system:</p> <ul style="list-style-type: none"> <li>• delegated responsibilities and authorities in relation to change management,</li> <li>• formal change plan defining the structure for change management,</li> <li>• identified and classified components of the gambling system for the configuration management,</li> <li>• recorded changes in a change log (and change log from suppliers if applicable)</li> <li>• determined configuration baseline for the gambling system in its entirety.</li> <li>• Suppliers Change Management Programme Certification reports</li> </ul> <p><b>Renewed Certification :</b> Documentation with details of any changes since previous review on the operation, procedures and policies used in operation, related to the clients Change Management Framework for managing changes to the gambling system:</p> <ul style="list-style-type: none"> <li>• Details of changes to delegated responsibilities and authorities in relation to change management,</li> <li>• Details of changes to formal change plan defining the structure for change management,</li> <li>• Details of changes to identified and classified components of the gambling system for the configuration management,</li> <li>• recorded changes in a change log (and change log from suppliers if applicable),</li> <li>• determined configuration baseline for the gambling system in its entirety.</li> <li>• Testing /certification reports for Category 3 changes</li> <li>• Details on any significant changes to the CIS which may affect valid certifications and/or result in conditions arising which may pose a risk to the lawful running of Games in accordance with the Regulatory Framework.</li> <li>• Suppliers Change Management Programme Certification reports</li> <li>• Previous certification report.</li> </ul> <p><b>Assessment and approval of changes (every 3 months):</b></p> <ul style="list-style-type: none"> <li>• List of changes (change register)</li> <li>• Component register</li> </ul>

Note: Submission requirements are included in our proposal (Agreement to be signed).

Determination (Evaluation) activities are undertaken to develop complete information regarding the fulfilment of the specified requirements, by the object of conformity assessment or its sample.

These activities include:

- Testing, Inspection
- Review of relevant procedures/processes as required by the type of processes
- Obtain evidence (by sample) to show that policies are being complied with, that procedures and standards are being followed, and that guidance is being considered



- **Evaluation Plan**

Each project is assigned a Project manager and Team Leader, to manage the determination (evaluation) activities.

In accordance with the certification scope, the project manager develops a project plan according to our management system and assigns competent personnel for each task. The plan consists of project timelines, assigning resources and selection of iTech Labs internal checklists according to the relevant jurisdictional requirements.

**Details on Type of Processes and Evaluation methods used (based on specific applicable requirements relating to the characteristics of the object of conformity).**

<b>Type of processes</b>	<b>Evaluation methods used</b>
<p>Information security management system processes that ensure the protection of the gambling system and business systems against threats and secure sensitive information stored in the systems. The Information security management system is applicable for offering of:</p> <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> <li>• Lotteries</li> </ul>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> <li>➤ Asking questions (enquiry based approach)</li> <li>➤ Gathering evidence (evidence based approach)</li> <li>➤ Being on-site / off-site and speaking to staff (observation based approach)</li> <li>➤ Review of procedures/processes where applicable.</li> </ul> <p>The following requirements from the <b>Spillemyndigheden's certification programme</b> regulations are covered in our checklists: SCP.03.00.EN.2.0 - Information Security Management System.pdf SCP.03.00.DK.2.0 - Information Security Management System.pdf</p>
<p>Change Management Programme processes that ensures that all changes to the gambling system are conducted according to the standards, ensuring an adequate quality for the implementation of changes. The Change Management Programme is applicable for offering of:</p> <ul style="list-style-type: none"> <li>• Online betting</li> <li>• Land-based betting</li> <li>• Online casino</li> <li>• Lotteries</li> </ul>	<p>iTech Labs has developed internal checklists consisting of the following evaluation methods and requirements:</p> <p>Evaluation methods:</p> <ul style="list-style-type: none"> <li>➤ Review of procedures/processes where applicable.</li> <li>➤ asking questions (enquiry based approach)</li> <li>➤ gathering evidence (evidence based approach)</li> </ul> <p>The following requirements from the <b>Spillemyndigheden's certification programme</b> regulations are covered in our checklists: SCP.06.00.EN.2.0 - Change Management Programme.pdf SCP.06.00.DK.2.0 - Change Management Programme.pdf</p> <p>For the assessment and approval of changes (every 3 months): Changes will be reviewed and sample tested as required Component register will be reviewed and baselined. The 3 months assessment is a review only and no certificate will be issued.</p>

• **Processes Evaluation and resources**

The evaluation activities are performed in accordance with the project plan and the standards and methods listed in the table above (*Details on Type of Processes and Evaluation methods used*). The objective is to ascertain if the Processes fulfil the specified jurisdictional requirements.

The evaluation activities are always performed by appropriately qualified personnel based on their qualifications, authorisations and experience in accordance with confidentiality and impartiality requirements. iTech Labs does not use subcontractors.

➤ **Nonconformities**

All non-conformities are recorded in iTech Labs Project management system with clear reference to the



jurisdictional requirements. Progress for each module is also recorded in iTech Labs project management system. The client is notified of non-conformances and progress in weekly or bi-weekly reports (Defects report and Progress report).

If the client expresses interest in continuing the certification process, iTech Labs will provide any additional information about the non-conformities and the evaluation tasks needed to be completed. As the agreement with the client is generally fixed price agreements, no additional cost is involved for the additional evaluation required after resolution of non-conformances. In case of additional costs, this is clearly mentioned in the agreement with the client.

If the client agrees to the completion of the additional evaluation tasks, and upon receipt of resolution of non-conformities, the project manager revises the evaluation plan and re-assigns personnel. The conformity assessment process or parts of it are repeated to complete the additional evaluation tasks.

The above process (reporting and resolution of non-conformities) is repeated until all non-conformities are resolved. After confirming resolution of non-conformities, the project management system is updated and the client is informed.

## ➤ Evaluation report

As part of the evaluation, internal checklists are used to ensure that all requirements are met, results are recorded, and evidence are kept. The outcomes of all evaluation activities, results and relevant evidence are documented and after satisfactory resolution of any nonconformities, an Evaluation report on the assessment team findings is prepared. The report will be considered as part of the total package of evidence to demonstrate compliance with the certification requirements by the certification body's person or group responsible for making the certification decision.

### • Use of conformity assessment results from other Conformity Assessment Bodies (CAB)

In some cases, on request from the customer, iTech Labs can accept conformity assessment results from other Conformity Assessment Bodies, if the following conditions are met:

- ✓ The scope of accreditation requirements is as defined in the iTech Labs Online Gaming Certification Scheme-DK.
- ✓ The test and inspection reports cover all relevant jurisdictional requirements.
- ✓ The results in these reports show compliance.
- ✓ The reports are current / valid as per the applicable requirements.

### Use of conformity assessment results from other Conformity Assessment Bodies (CAB) for certifications under Spillemyndigheden's Certification Programme - Information Security Management System

iTech Labs will accept conformity assessment results in line with Spillemyndigheden's Certification Programme - Information Security Management System, when the **applicant / licence holder has a valid ISO/IEC 27001 certification** and if the following conditions are met:

- ✓ The certification body issuing the certificate is accredited against ISO/IEC 17021-1 for certification referring to ISO/IEC 27001.
- ✓ If the certification body is from EA's jurisdiction, accreditation should be by DANAK (the Danish Accreditation Fund) or a similar accreditation body, who is co-signer of EA's (European co-operation for Accreditation) multilateral agreement with regard to certification of management systems;
- ✓ If the certification body is from outside EA's jurisdiction, accreditation by an accreditation body, who is co-signer of the relevant multilateral agreement on reciprocal recognition under IAF (International Accreditation Forum).
- ✓ The combined scope of the license holder and supplier's ISO/IEC 27001 certifications must encompass the entire gambling system as defined in the Danish legislation, as well as any process related to the gambling system and all physical locations of the gambling system.
- ✓ The conformity assessment results must include:
  - Valid ISO/IEC 27001 Accreditation/Certification
  - Statement of Applicability, and
  - Risk assessment.



When **the applicant / licence holder does not have a valid ISO/IEC 27001 certification**, iTech Labs will accept conformity assessment results in line with Spillemyndigheden's Certification Programme - Information Security Management System if the following conditions are met:

- ✓ Certification in accordance with the Spillemyndigheden's Certification Programme - Information Security Management System SCP.03.00.DK.
- ✓ The certification body, issuing the certificate is accredited against ISO/IEC 17021-1 or ISO/IEC 17065 for certification referring to Spillemyndigheden's Certification Programme SCP.03.00.EN and SCP.03.00.DK
- ✓ If the certification body is from EA's jurisdiction, accreditation should be by DANAK (the Danish Accreditation Fund) or a similar accreditation body, who is co-signer of EA's (European co-operation for Accreditation) multilateral agreement with regard to certification of management systems;
- ✓ If the certification body is from outside EA's jurisdiction, accreditation by an accreditation body, who is co-signer of the relevant multilateral agreement on reciprocal recognition under IAF (International Accreditation Forum).
- ✓ The conformity assessment results must include:
  - Valid Certification for Spillemyndigheden's Certification Programme SCP.03.00.EN and SCP.03.00.DK
  - Documentation for the accreditation of the certification body. Alternatively, a link to the accreditation can be provided in the certification report.

#### **Use of conformity assessment results from other Conformity Assessment Bodies (CAB) for certifications under Spillemyndigheden's Certification Programme - Change Management Programme**

iTech Labs will accept conformity assessment results in line with Spillemyndigheden's Certification Programme - Change Management Programme if the following conditions are met:

- ✓ Certification in accordance with the Spillemyndigheden's Certification Programme - Change Management Programme- SCP.06.00.EN and SCP.06.00.DK
- ✓ The certification body, issuing the certificate is accredited against ISO/IEC 17021-1 or ISO/IEC 17065 for certification referring to Spillemyndigheden's Certification Programme SCP.06.00.EN and SCP.06.00.DK.
- ✓ If the certification body is from EA's jurisdiction, accreditation should be by DANAK (the Danish Accreditation Fund) or a similar accreditation body, who is co-signer of EA's (European co-operation for Accreditation) multilateral agreement with regard to certification of management systems;
- ✓ If the certification body is from outside EA's jurisdiction, accreditation by an accreditation body, who is co-signer of the relevant multilateral agreement on reciprocal recognition under IAF (International Accreditation Forum).
- ✓ The conformity assessment results must include:
  - Valid Certification for Spillemyndigheden's Certification Programme SCP.06.00.EN and SCP.06.00.DK.
  - Documentation for the accreditation of the certification body. Alternatively, a link to the accreditation can be provided in the certification report.

#### **➤ Review**

On completion of the evaluation process, the outcome of all evaluation activities, results and relevant evidences of the Processes compliance with the defined certification scheme and the evaluation report are gathered and presented for an independent review by a senior staff member, not involved in the evaluation process.

The aim of this review is to ensure that they provide a suitable, adequate, and effective demonstration that the Processes fulfil the specified requirements.

If the evidence is sufficient, a recommendation for certification is made. The Evaluation report, the results of the review and recommendations are sent to the Certification Committee.

#### **➤ Certification decision**

The **Certification decision** is the consideration of the suitability, adequacy and effectiveness of the selection and determination activities, as well as the results of these activities, with regard to the fulfilment of specified



requirements for the object of conformity assessment.

iTech Labs is responsible for, and retains authority for, all decisions related to certification under this scheme. The certification decision is drawn upon review of all information related to the evaluation, documentation, results, independent review and relevant information from the whole certification process. The certification decision is made by the Certification Committee, not involved in the evaluation activities.

iTech Labs will inform the client of the certification decision.

In case the outcome of the review is positive, iTech Labs decides to grant the certification. As a result of the positive decision, the client will be provided final certification report and certificate. The certification documents reflect the scope of certification in detail, including unique certification number, name of scheme under which the certificate is issued, name and address of the certification body, name and address of the certificate holder, reference to certification agreement, statement of conformity, the date of the certification, and the expiry date of the certification and legally binding signature of authorised personnel.

In case the outcome of the review is negative, iTech Labs decides not to grant the certification and in addition to the decision, the client will also be provided with the reasons for the negative decision.

## ➤ **Attestation, licensing**

iTech Labs will issue formal certification only upon fulfilment of the following conditions:

- The certification agreement (proposal) has been completed /signed by both parties.
- Payments have been received.
- Certification requirements have been satisfied.
- The decision to grant or extend the scope of certification have been made.

Following the decision to grant certification, iTech Labs issues a statement of conformity. The 3 months assessment performed as part of the Change Management Programme is a review only and no certificate will be issued.

Under this scheme, the statement of conformity is in the form regulatory reports (templates provided by the regulator) and a certificate. The certificate will be listed on iTech Lab's website subject to client's approval.

iTech Labs certificate clearly displays the reference to the scheme, lists the Identification of the subject of the assessment and display a statement of conformity - "Summary of the outcome of the assessment: Comply". The client will be granted the right to use the certificates and other statements of conformity.

### **Use of certificates and marks**

iTech Labs is the owner of this certification scheme and the scheme can be used for certification only by iTech Labs. iTech Labs is the authorised entity to make all decisions related to certifications made under this scheme.

iTech Labs is the only certification body that can refer to this certification scheme in marketing or public materials. iTech Labs ensures control over the ownership, use and display of certificates, and any mechanisms for indicating a process is certified.

iTech Labs' Terms and Conditions/Rules define all the information related to use of certificates.

iTech Labs has rules governing the use of any statement or accompanying information, related to certification, under this scheme. iTech Labs will take suitable action when dealing with incorrect references to certification status or misleading use of certification documents, marks, or certification statements.

The iTech Labs Online Gaming Certification Scheme-DK does not cover the use of certification marks.

## ➤ **Termination, reduction, suspension or withdrawal of certification**

iTech Labs' processes certification work is performed within a defined period of time and includes obtaining a baseline –and evidence. The certification of processes related to Spillemyndigheden's certification programme components - Information security management system (SCP.03.00) and Change management programme (SCP.06.00) have an expiry date. Any current certification becomes suspended upon reaching the expiry date and/or major changes to the certified processes, which then requires a conformity assessment, as part of a new certification process. The new certification process will result in a new certificate, which will replace the previous one.



In cases of non-conformance in certified **Processes** being identified by, or reported to iTech Labs, iTech Labs will investigate, consider and decide on appropriate action, which may include:

- Evaluation, review and/or a certification decision, as per iTech Labs' scheme, and issuing a new certificate to replace the previous one. The new certification process will start once the non-conformity has been rectified and will go through the same conformity assessment process defined in this scheme.
- Conditional continuation of the certification - iTech Labs will define and impose additional conditions that the customer must implement and follow.
- Reduction in the scope of certification to remove the non-conforming Processes variant.
- Suspension of the certification, pending remedial action by the client.
- Withdrawal of the certification.

In cases iTech Labs suspends/withdraws the certification, the client will be clearly informed on what actions are needed to end the suspension/withdrawal and restore certification, according to the iTech Labs Online Gaming Certification Scheme-DK, and any additional relevant actions and requirements that are considered appropriate by iTech Labs.

## Changes affecting certification

iTech Labs' Management System has a process for monitoring the development of the standards and other normative documents, which define the specified requirements used in the scheme.

In case the certification scheme presents new or updated requirements that affect the client certification, changes are implemented, as per the process in our Management System, and iTech Labs ensures that details of the changes are communicated to all clients. iTech Labs verifies the implementation of the changes by the clients and follows the certification steps required by the scheme.

In cases where the client introduces changes into the certified processes, iTech Labs will decide upon appropriate actions (selection, determination, review, decision, issuance of a revised formal certification document to extend or reduce the scope of certification, etc.) in accordance with the scheme.

As a scheme owner, iTech Labs will review the operation of the scheme on a periodic basis (at least annually) in order to confirm it is meeting its objectives, and to identify aspects that require improvement.

## Surveillance

All Processes certified under this scheme are subject of a new certification (certification renewal) within 12 months of the latest certification with particular reference to:

- Changes in personnel, especially responsible persons;
- Changes in **Processes of** management and management systems;
- Facilities, equipment, software and documentation managements system, their ability, maintenance and update;
- Records and traceability of use of the certified systems;

The activities performed during the Surveillance are the same as for the Original Certification with appropriate sampling. The required submission for certification renewal is as per the iTech Labs Online Gaming Certification Scheme- DK.

## Directory of certified products / processes

iTech Labs maintains details on all certified products and processes. iTech Labs preserves information such as:

- Certification number
- Identification of the client, products and processes
- The standard and other normative documentation to which conformity has been certified
- Formal certification documents

iTech Labs will provide information, upon request, about the validity of a given certification.

## Records

iTech Labs maintains and keeps records on all certifications including results and evidences. iTech Labs ensures that record confidentiality is upheld during retention, transport, transmission or transfer in any way.



## Publicly available information

iTech Labs maintains on its website, and on request, makes available, iTech Labs' Online Gaming Certification Scheme-DK, including: evaluation methods; relevant jurisdictional standards, certification activities, rules and procedures for granting, maintaining, extending or reducing the scope of certification; or for suspending, withdrawing or refusing certification, information on complaints and appeals and terms & conditions. Additionally, iTech Labs maintains, and on request, makes available: general information on the fees charged to applicants and to clients and any additional relevant information as requested by the clients. The public information will be available on [www.itechlabs.com/certification](http://www.itechlabs.com/certification)

## Confidentiality

iTech Labs is responsible for the management of all information obtained or created during the certification activities. At all times, personnel involved in the certification activities, treat all acquired information as confidential and private. This is in accordance with iTech Labs' employment contract, which is a legally enforceable agreement at all levels.

Information about the client, from sources other than the client (e.g. complainant or regulators), is and shall be treated as confidential, consistent with iTech Lab's policies.

iTech Labs will inform the client in advance, of the information it intends to place in the public domain. All other information, except for information that is made publicly accessible by the client, is and shall be considered confidential.

Except as required by the certification standards, information about a particular certified client will not be disclosed to a third party, without the written consent of the certified client.

When iTech Labs is required by law or authorised by contractual arrangements (such as with the accreditation body), to release confidential information, the client concerned shall, unless prohibited by law, be notified of the information provided.

iTech Labs has processes and, where applicable, equipment and facilities that ensure the secure handling of confidential information

## Processes Liability

In this scheme, all questions related to Processes liability are dealt with on the basis of the relevant legal system(s).

## Complaints and appeals

iTech Labs has a documented process to receive, evaluate and make decisions on complaints and appeals, related to the certification of Processes related to this scheme.

Upon receipt of a complaint or appeal, iTech Labs will log the complaint in our system, send acknowledgement to the client, investigate, and confirm that the complaint or appeal relates to iTech Labs' certification activities, and if so, will address it. The client will be informed of the progress and final decision.

iTech Labs is responsible for all decisions, at all levels, of the complaints and appeals handling process. iTech Labs ensures that the persons engaged in the complaint and appeal handling process, are different from those who carried out the evaluation and made the certification decisions.

iTech Labs will provide a formal notice of the outcome of the investigation to the complainant and/or appellant.

The submission, investigation and decision on complaints and appeals shall not result in any discriminatory actions against the complainant or appellant.





## Certification agreement Rules

The customer agrees to follow and abide by iTech Labs' certification rules as below:

1. The customer always fulfils the certification requirements, including implementing appropriate changes when they are communicated by iTech Labs. This will include product / processes requirements that are fulfilled by the client, as a condition for establishing and maintaining certification. Product / processes requirements relate directly to a product / processes, specified in standards, regulations and specifications, or are imposed by the certification scheme.
2. If the certification applies to ongoing production processes, the client agrees that the certified product / processes continues to fulfil the product / processes requirements (specified in standards, regulations and specifications or imposed by the certification scheme).
3. The client agrees to make all necessary arrangements for:
  - the conduct of the evaluation and surveillance (if required), including provision for examining documentation and records, and access to the relevant equipment, location(s), area(s), personnel, and client's subcontractors;
  - investigation of complaints;
  - the participation of observers, if applicable;
4. The client makes any claims regarding certification, consistent with the scope of certification:
  - the products, processes or services for which certification is granted;
  - the applicable certification scheme;
  - the standards, regulations, specifications and the certification scheme, by which it is judged that the products/processes/services comply.
5. The client does not use its product / processes certification in such a manner as to bring the certification body into disrepute, and does not make any statement regarding its product / processes certification that the certification body may consider misleading or unauthorised.
6. The client agrees that upon suspension, withdrawal, or termination of certification, the client discontinues its use of all advertising matter that contains any reference thereto, and takes action, as required, by the certification scheme (e.g. the return of certification documents), and takes any other required measure.
7. If the client provides copies of the certification documents to others, the documents shall be reproduced in their entirety, or as specified in the certification scheme.
8. The client agrees that in making reference to its product / processes certification in communication media, such as documents, brochures or advertising, the client complies with the requirements of the certification body, or as specified by the certification scheme.
9. The client complies with any requirements that may be prescribed in the certification scheme, relating to the use of marks of conformity, and on information related to the product/ processes.
10. The client agrees to keep a record of all complaints made known to it, relating to compliance with certification requirements, and makes these records available to the certification body when requested, and takes appropriate action with respect to such complaints and any deficiencies found in products / processes that affect compliance, with the requirements for certification, and documents the actions taken.
11. The client agrees to inform the certification body, without delay, of changes that may affect its ability to conform to the certification requirements. Changes can include the following:
  - the legal, commercial, organisational status or ownership,
  - organisation and management (e.g. key managerial, decision-making or technical staff),
  - modifications to the product / processes or the production method,
  - contact addresses and production sites,
  - major changes to the quality management system.
12. Where witnessed assessments are deemed necessary, the client agrees to provide, on request, access to the United Kingdom Accreditation Service (UKAS) representatives, to assess the certification body's performance in carrying out conformity assessment activities at the client's premises.
13. A certificate or report issued by the certification body in no way implies that any product, service, process or management system is approved by UKAS.

Revision Updated	Date	Description of Change	Authorisation
1.0	23 Aug 2022	Created and submitted to UKAS	Created: Gyulserian Hyussein Reviewed and Authorised: Kiren Sreekumar
2.0	21 Dec 2022	Updated to reflect the new scheme is a process certification scheme for the information security and change management	Created: Gyulserian Hyussein Reviewed and Authorised: Kiren Sreekumar



		processes of Danish Gambling Authority License Holders	
3.0	20 Oct 2023	Added 'ITL-KYC Know Your Customer' form details under the section "Application for certification and certification agreement"	Updated: Deval Mau Reviewed and Authorised: Alvin Rizaldi