

Technical information note on the most common mistakes made by operators in the use of the web services provided by the general directorate for gambling regulation

Given the erroneous behavior among many operators in relation with the use of Web Services provided by the General Directorate for Gambling Regulation to make more accessible the compliance with regulations on identity verification and the presence on the RGIAJ (General Registry of Players Prohibited from Accessing Gambling), it has been considered that in order to correct their behavior, information on the most common mistakes made by operators should be provided.

Format errors

- In the case of players with NIF Identification (Tax Identification Number), it is compulsory to have two surnames
- In the case of players with NIE Identification (Foreigner Identity Number), it is compulsory to have one surname, and an optional second one.
- Names and surnames of players must not contain (invalid) characters which are not allowed such as numbers.
- Date birth previous to 01/01/1900 are not valid

Difference between the incorrect identification of a player identity and the impossibility to carry out the identity identification.

- An incorrect identification may occur due to:
 - The request for identification of a player with data not correctly matched with those appearing on the NIF / NIE, will result in COD004, showing on the error message the reason for the incorrect identification (TITULAR NO IDENTIFICADO)
 - On the request including data with an error format (i.e. the second surname has not been included), the error message obtained will be COD901.
 - o On the request including invalid characters the error message obtained will be COD902
 - On the request of player identification with birth date prior to 1900 the error message obtained will be COD901.
 - In the four previous cases <u>it does not make sense that the same data are submitted to the DGOI</u> <u>again by the operator</u>, as the response will be the same. It will be necessary to change the data of the request in order to achieve a correct identification.
 - In the case that even submitting different data three incorrect identification responses are obtained, the operator must cancel the player identification using the means provided by the DGOJ, starting a phase of player verification data (as it could be read at <u>Resolución de 12 de julio de 2012, de la Dirección General de Ordenación del Juego, por la que se aprueba la disposición que desarrolla los artículos 26 y 27 del Real Decreto 1613/2011, de 14 de noviembre, en relación con la identificación de los participantes en los juegos y el control de las prohibiciones subjetivas a la participación.
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 - An identification request of a player with NIF / NIE resulting in a COD004, associated with the message "La identidad del usuario es incorrecta - SE HA ENCONTRADO MAS DE UN REGISTRO CON ESE IDENTIFICADOR ". In this case the operator must cancel the player identification using the means provided by the DGOJ, starting a phase of player verification data.
- Impossibility of carrying out the identification
 - o It may be caused by



- The DGOJ services fall over (crash) (lack of response due to the crashing of the service or because an identification request does not report the corresponding response in the estimated time -30 seconds per each individual identification requests)
- Due to a technical impossibility to carry out the request (framed in response COD005 code)
- Technical error (ERR001)
- In all previous cases the operator will be able to retry the identification after a time that allows the DGOJ to enable the restore service (estimated time: 30 minutes as it could be read at <u>Resolución de 12 de julio de 2012, de la Dirección General de Ordenación del Juego, por la que se aprueba la disposición que desarrolla los artículos 26 y 27 del Real Decreto 1613/2011, de 14 de noviembre, en relación con la identificación de los participantes en los juegos y el control de las prohibiciones subjetivas a la participación.
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- Inclusion of duplicate players in the same request (ERR003). In that case the operator will be able to detect the problem and immediately submit the corrected request.

VerificarCambiosRGIAJ use

The DGOJ provides the changes in the RGIAJ 24 times a day, at each hour o'clock sharp. Operators must check the VerifyChangesRIGJ method every hour to update their customer database the changes that have been made in RGIAJ so far. <u>It makes no sense to connect to the link method more than 24 times per day.</u> If there was more than 50 diary request of VerificarCambiosRGIAJ, the DGOJ will consider that traffic as an attack and will block the operator IP address, preventing any further.

Individual consultation of the status of a player registered in the RGIAJ (General Registry of Players Prohibited from Accessing Gambling)

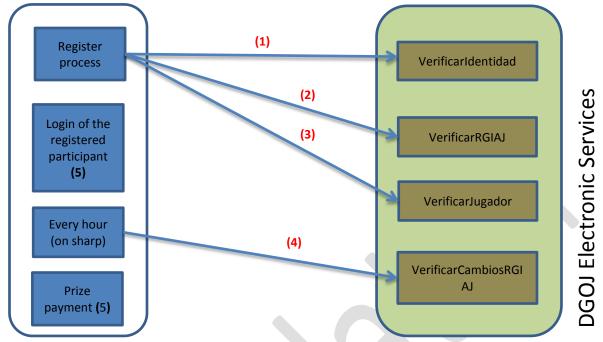
When an operator makes a consultation of the status of a player registered in the RGIAJ (using either of the two available operations -VerificarJugador or VerificarRGIAJ-), the DGOJ associates that player to the operator, reporting the changes in his status in the RGIAJ through the VerifyChanges RGIAJ operation. <u>It makes no sense for</u> an operator to repeatedly check (even on different days) the status of the same player in the RIGJ.

In the case of using VerificarJugador operation regardless of the outcome of the identification (correct or not correctly identified user, the player will be associated to the operator to carry out the corresponding messages through VerificarCambiosRGIAJ. An additional note to mention that if any of the above-mentioned operations obtains a format error as response, the player will not be associated to the operator, in such a way that the operation VerificarCambiosRGIAJ will not alert on the changes of the status of that player in the RGIAJ.

Possible differences between the information included in identification cards (NIF/NIE) and the response obtained in the identification checking.

The DGOJ provides the identity verification services using computerized information from the Police General Directorate. In order to obtain a correct identification, the player must enter the data exactly the same as the information appears on the identification card. There may be cases in which the data included in these cards are different from the ones stored on the Police General Directorate computer file. Such cases will be individually resolved by the player with the Police General Directorate, as the DGOJ cannot check personal identification data to find out the possible error without breaching current legislation. So, in this case the operator must cancel the player identification using the means provided by the DGOJ, starting a phase of player verification data





Examples of use of each of the methods

(1) In the case that the operator uses the identifying participant services provided by the DGOJ, the service will be used at the initial stage of the registration process in order to verify the player identity and, in the case of an incorrect identification (misidentification) later stages of the registration process cannot be accessed while other verifications are carried out (status of the General Registry of Players Prohibited from Accessing Gambling - RGIAJ-) or other additional data needed for the effective registration of the user account (credit card, address, ...) have been required. From the DGOJ point of view there will be no association between player and operator.

(2 To use in the final stage of the registration process, after which the user account may be activated (if appropriate). Using this method involves that the DGOJ will associate the player to the operator who makes the consultation, so in the future and regarding the consultation, changes of the status of the player in the RGIAJ will be notified through VerificarCambiosRGIAJ.

(3) To use when the player's registration process is carried out in one stage, verifying in one stage both, identity and status in RGIAJ, after which the user account may be activated (If appropriate). Using this method involves that the DGOJ will associate the player to the operator who makes the consultation, so that in the future and regarding the information of the player checked, the changes of his status in the RGIAJ will be notified through VerificarCambiosRGIAJ.

As additional information to the three previous cases it is necessary to remember that, unless the exception stated in the next paragraph regarding operations to be carried out when services are not available, usage of electronic services provided by the DGOJ will only be used as a result of an action started by the participant.

(4) Given that changes in the status in RGIAJ take place at every hour o'clock sharp, data obtained in the consultation of the method are valid for the next hour and should be used to prevent the operation of any gambling activity as provided under the current regulation.



(5) Both actions must take into account the player's status in RGIAJ. In order to achieve this it will be used the information obtained through the service VerificarCambiosRGIAJ, whose responses will update the operator's customer database so that this operator includes the updated information in order to act accordingly.

Actions to be carried out in the case that the aforementioned services are not available:

1. - Unavailability of identity verification service (or Verifyldentity or VerificarJugador service): The operator will be able to use the mechanisms to enable the identity verification. Once the service has been restored it will be possible to check those users who could not be verified during the system crash period. As it could be read at <u>Resolución de 12 de julio de 2012, de la Dirección General de Ordenación del Juego, por la que se aprueba la disposición que desarrolla los artículos 26 y 27 del Real Decreto 1613/2011, de 14 de noviembre, en relación con la identificación de los participantes en los juegos y el control de las prohibiciones subjetivas a la participación. the operator could retry the request each 30 minutes.</u>

2. - Unavailability of identity verification service in RGIAJ (VerificarRGIAJ methods and VerificarJugador): The DGOJ will establish the contingency mechanisms required to provide this information through an alternative procedure.

3. VerificarCambiosRGIAJ: if this service is not available, download will be retried at a later time and the operation will be carried out with the information previously downloaded from the previous consultation made.

Upcoming features of Web services

In view of the inadequate use of the services provided by the DGOJ, in the near future a new feature will be deployed to avoid the indiscriminate and not allowed use of the DGOJ services.

Therefore, regarding the checking of the status of a player in RGIAJ (through VerificarJugador or VerificarRGIAJ operations) in the case that the operator has already request information about that NIF/NIE more than a certain number of times, the operation will return an error showing that individual NIF/NIE checking in relation to RGIAJ of players associated to the operator concerned must be made through VerificarCambiosRGIAJ operation. To enable a certain number of times to request for the same NIF/NIE is due to ensure that the response submitted by the DGOJ reaches the operator and it is also considered by the operator, although honestly speaking it should be never requested information about a previously checked NIF/NIE.

In relation to the identification checking it will be followed the above mentioned policy, taking in account that only in this case:

- It will be checked that all identity data match (name, NIF/NIE and date of birth) to confirm that the request has already been submitted by the concerned operator.
- It will be allowed to submit requests with repeated data within a certain period of days in order to allow players who have incorrect data (differences between data included in the Identity card and data stored in the Police General Directorate database, as Police contrast the validity of the identity) modify the relevant authority and retry the identification process.

At the time of this writing there is no specific date for implementation of these features, although the procedure will be firstly deployed in the pre-production area and in the production area afterwards. A sufficient interval of time in between will be considered to allow operators to carry out the relevant developments and appropriate verifications.