



**GOVERNMENT OF THE CITY OF BUENOS AIRES**

"2019 -Year of the 25th Anniversary of the recognition of the autonomy of the City of Buenos Aires"

**Board Resolution**

**Number:** RESDI-2019-80-GCABA-LOTBA

Buenos Aires,

Thursday, April 25, 2019

**Reference:** EX-2018-31933557-MGEYA-LOTBA Approves Regulations and Comprehensive and Social Policy for Responsible Gaming

**VIEWED:** Laws No. 538 and No. 5,785 (texts consolidated by Law No. 6,017), Decree No. 88-GCABA / 17, Resolution No. 487-LCABA-2018, Board Resolution No. 321-LOTBA / 18, File Electronic No. EX-2018-31933557-MGEYA-LOTBA and,

**CONSIDERING:**

That Lottery of the City of Buenos Aires S.E. (hereinafter "LOTBA SE") with a view to achieving its corporate purpose as organizer of games of chance, skill and mutual bets and related activities in the area of the City of Buenos Aires and in its capacity as Authority of Application of Law 538 (cf. Art. 2 Law 5785, text consolidated by Law No. 6017) issued Board Resolution No. 321-LOTBA / 18 through which it created online games using machines, instruments or supports, of any type or technology indicated in its Annex I (cf. Art. 1 of said Resolution), which was approved by the Legislature of the Autonomous City of Buenos Aires through Resolution No. 487-LCABA-2018 dated December 13, 2018

That by the mentioned Resolution of LOTBA SE it was established that the activities of commercialization and / or distribution and / or sale of the online games owned by LOTBA SE may be carried out both by LOTBA SE directly, as well as by natural or legal persons defining Online Games Agencies or Platforms as: "... the human or legal person who owns an" online games "platform that, by using machines, instruments or supports, of any type or technology, performs the commercialization and / or distribution and / or sale in accordance with the provisions of Law No. 538 (text consolidated by Law No. 6,017) any online game of: chance and / or skill; sports bets; bets virtual games and bets non-sporting events "(Art. 2, inc. e);

That the basic principles for the development of the games created have also been established stipulating when online games produce effects in the Autonomous City of Buenos Aires (cf. Art. 3 °); what are the games included (cf. art. 4); requirements to be the holder of an Agency (cf. Arts. 6 and 7); prohibitions to be the holder of an Agency and to bet on online games (cf. Arts. 8 and 9);

That regarding the regulation of the conditions for the development of the games created, it has been stipulated that LOTBA SE will dictate the regulations related to the operations of the games created with respect to the audit and control systems, suitable technical systems for the identification of gamblers and standards in the area of responsible gambling and prevention of pathological gambling (cf. Art. 11) setting basic principles to be observed by the regulations (cf. Arts. 12, 13, 14 and 15);

That it has also been contemplated (cf. Arts. 5 and 10) the regulation of the modality of each one of the games created and their requirements of enforceability (understanding by the latter the rights, obligations,

granting and expiration criteria of Online Gambling Agencies; to the modality of collection and collection; and to the homologation and requirements of the technical systems) stating that these aspects of the regulation will be sent for endorsement by the Legislature of the Autonomous City of Buenos Aires within the framework of the provisions of Article 18 subsection a of Law No. 538 ( text consolidated by Law No. 6017);

That Law No. 25,246 on Prevention of Money Laundering and Terrorism Financing, establishes in its Article 20 inc. 3, that human or legal persons who as a habitual activity exploit games of chance are found to be bound by the obligations imposed by said norm;

That, likewise, the Financial Information Unit (FIU), in its capacity as Law Enforcement Authority No. 25,246, has issued Resolution No. 199-UIF / 11 that regulates the gaming sector;

That, in its capacity as a Mandatory Subject, LOTBA S.E. develops and implements a comprehensive prevention policy, which includes its internal regulations, systems, tools and processes for monitoring, control and reporting and all other aspects required in order to comply with its obligations to the Financial Information Unit;

That, in this context, through the issuance of Board Resolution No. 76-LOTBA / 19, the Policy on Prevention of Money Laundering and Terrorism Financing and the Manual on Prevention of Money Laundering and Terrorism Financing were approved ;

That, in the aforementioned framework, in order to fully comply with the provisions of Articles 5 and 10 of Board Resolution No. 321-LOTBA / 18 and with the purpose of complementing the regulatory framework of reference by means of which establish the substantial principles for the development of the Online Games created by the referred resolution, intervention of its competence has been given to the technical areas of LOTBA SE;

That the Games Operations and Marketing Sub-divisions have issued a report on their specialty through IF-2019-12774242-GCABA -LOTBA, promoting the approval of the regulations of the games created, contemplating their modalities and the guidelines that should be taken into consideration in order to issue the corresponding regulations;

That, in turn, the Sub-Management for Gambling Conduct (cf. IF-2019-12780383-GCABA -LOTBA) has stated that it is convenient to approve the Comprehensive and Social Responsible Gaming Policy committed to protecting the rights of minors. , consumers and users (cf. 12 of Directory Resolution No. 321-LOTBA / 18);

That, the Deputy Manager of Intelligent Control of Games and Gambling (IF-2019-12803931-GCABA -LOTBA) indicating, among other aspects, that it is necessary to establish the obligation of homologation and certification - granted by international laboratories recognized by LOTBA S.E. - of all the software, hardware, game material and other components used for the commercialization and / or distribution and / or sale of the online games appropriately created;

That, the Unit for the Prevention of Money Laundering and the Prevention of Terrorism has intervened, indicating the aspects to be incorporated in these regulations (cf. IF-2019-12815727-GCABA -LOTBA);

That the Management of Modernization and Information Technologies (cf. IF-2019-12821357-GCABA -LOTBA) has taken action promoting - within the framework of the best practices collected at the international level and the usual practices of the industry - the Technical Requirements that online gambling agencies must comply with;

That, likewise, the Administrative Management Sub-department (cf. IF-2019-12839108-GCABA -LOTBA);

That regarding the regulation of the operational questions necessary for the implementation of the activities regulated in the Resolution of the Directory No. 321-LOTBA / 18 related to the conditions of distribution, sale and commercialization of the Online Games, it should be borne in mind that the Article 17 of Law N ° 538 (text consolidated by Law N ° 6.017) establishes, among the functions that correspond to the Application Authority, to organize, administer, regulate, exploit, collect and directly control the gambling games contemplated in this law; regulate everything pertaining to the distribution and sale of gambling games and set the marketing policy for the products it exploits;

That attentive to the provisions of Articles 5 and 10 of the aforementioned Resolution, it is appropriate to carry out the procedures aimed at obtaining the endorsement of this Resolution by the Legislature of the Autonomous City of Buenos Aires;

That the Intervention of the Gaming, Gaming and Gambling Control, Modernization and Information Technologies, the Money Laundering Prevention Unit and the Administrative and Technical and Legal Affairs Sub-Departments have taken the intervention of their competence;

That the Attorney General of the Autonomous City of Buenos Aires has taken the intervention that is incumbent upon it pursuant to the provisions of Article 13 of Law No. 1,218 (text consolidated by Law No. 6,017);

Therefore, and in exercise of the functions and powers entrusted by Articles 17 and 18 of Law No. 538 (consolidated text by Law No. 6.017), and Article 15 of the Statute of Lottery of the City of Buenos Aires, approved by Decree No. 88-GCABA / 17,

**THE LOTTERY DIRECTORY  
OF THE CITY OF BUENOS AIRES S.E.**

**RESOLVES:**

**Article 1 °** .- Approve the regulation of the modality of each of the games created by Board Resolution No. 321-LOTBA / 18 (cf. IF-2019-13132303-GCABA -LOTBA) and its enforceability requirements (cf. IF-2019-13131645 -GCABA -LOTBA and IF-2019-13133844-GCABA -LOTBA) which as Annexes I, II and III form an integral part of this.

**Article 2 °** . - Approval of the Comprehensive and Social Responsible Gaming Policy (cf. IF-2019-13130986-GCABA - LOTBA) which, as Annex IV, forms an integral part of this.

**Article 3** . - Give intervention to the General Directorate of Legislative Matters for the purposes provided in the Article 18 inc. a) of Law 538 (text consolidated by Law N ° 6.017).

**Article 4** .- For the General Secretary, be published in the Official Gazette of the Autonomous City of Buenos Aires and carry out whatever steps may be taken. Fulfilled, file.

Pando Agustina  
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LOTTERY OF THE CITY OF BUENOS AIRES S.E

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## GOVERNMENT OF THE CITY OF BUENOSAIRES

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### Report

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### ANNEX I

#### ONLINE GAMES REGULATION

##### **Article 1 .- Scope of application**

These Regulations are applicable to all online games of chance and / or skill; sports bets; bets virtual games and bets non-sporting events made using machines, instruments or supports, of any type or technology consisting of: online sports betting, online slots, online roulette, card games (poker, black jack, point and banking) and Lottery Games as established in Annex I of Resolution No. 321 - LOTBA / 18 or the one that will replace it in the future.

##### **Article 2 ° .- Participation**

Online games are those in which the operation is carried out through a gaming platform, which has the corresponding enabling title and operates over the Internet using remote connection devices, offering the bettor an interactive means of participation.

In order to be able to participate in any of the online games offered by the Online Gambling Agencies, the bettor will create a user account for free, which will require the necessary information to complete the registration process. The information provided at the time of registration will be safeguarded by Law No. 1845/2006 (text consolidated by Law No. 6017). The treatment of said data is reserved exclusively to LOTBA S.E.

Participation in online games will not be allowed without prior registration. The account is considered personal and non-transferable, as well as the funds that are in it.

The acquisition of credits for participation and the withdrawal of their value are made through the payment method selected by the bettor among those authorized by LOTBA S.E

The credits acquired are reflected in the game account from which the bettors can place their bets on the different authorized games that are available on the platform. The amount of money to bet cannot exceed the amount of the balance that the bettor has in his gaming account at the moment of starting the gaming session.

Once the bet has been made, the game is developed, obtaining the result either immediately or deferred. The development of the game and its form of resolution depend on the mechanics of the selected game and the rules that apply to them.

Once the result is generated, the bettor is creditor of the prizes that, according to the prize plan of the game in which the bet was made, correspond to him.

##### **Article 3.- User Account and Game Account**

Once the user account is created, an associated game account must be automatically generated, in which the

bettor may consult the following information:

1. Account balance.
2. Game account history and participations or plays. Transaction report that allows checking profits and losses, as well as account balances. It will contain at least the following information: identification of the bet played, the value of the bet, event in which it participates, type of bet, forecast made, coefficient assigned to the bet at the time it is made.
3. Deposits and withdrawal of funds made.

#### **Article 4.- Publication of bets and results**

The value of the bets, as well as the maximum and minimum bet ranges, and the results of the games will be published on the site and / or platform clearly and visibly, in order to guarantee that the bettors know if their bets they were awarded or not, according to each type of game and their prize plan.

#### **Article 5 .- Awards**

The determination of the prizes depends on the type of game and the bet made. The successes of the bets made will be paid according to the prize plan of each game.

The prize plans will be public and accessible to bettors and will include all possible winning combinations and a description of the prize corresponding to each combination.

The prizes are reflected in the bettor's account and are added to the balance available in his game account.

#### **Article 6.- Transfers between gambling accounts**

Balance transfers between gambling accounts of different bettors are not allowed.

Loan loans by online gambling agencies to bettors are prohibited.

#### **Article 7.- Types of bets**

The bets can be developed in the modalities that are detailed below:

Mutual bet: it is one in which a percentage of the sum wagered is distributed among those bettors who would have guessed the result to which the bet refers, in accordance with the provisions of the prize plan.

Counterparty bet: That in which the bettor bets against the bank and gets the right to a prize if the prediction on the bet is correct, the prize being the result of multiplying the amount of the winning predictions by the coefficient that has been previously validated for them.

Cross bet: it is the one in which the online gambling agency acts as an intermediary and guarantor of the sums bet between the bettors. Cross bets are based on a bet coefficient that determines the amount that the bettor will be able to win in the cross bets in favor or the amount that the bettor must risk in the cross bets against.

Regarding the number of events, bets can be classified into:

Simple bet: one that falls on a single result of an event or fact related to it and in which a percentage of the bets placed is distributed among the bettors.

Multiple bet: one that falls on two or more results of the same event or related fact.

Combined bet: the one that falls on the results of two or more events.

#### **Article 8 .- Authorized online games.**

Under the provisions of Annex I of Resolution No. 321 -LOTBA / 18, online gambling can be classified into two categories:

1. Online games in which a Number Generator intervenes in the determination of the result or in the development of the game

Random. Within this category are the following games:

1. Slot machines or online gambling
2. Online roulette
3. Black Jack online
4. Online poker
5. Point and online banking
6. Online Lottery Games

2. Online games in which the result is determined by the occurrence of a real event whose results are future and uncertain, on which the bettor makes a forecast and who, in case of success, is awarded a prize. Within this category are:

1. Online sports betting

#### **Article 9.- Slot machines or online gambling**

They are those counterpart betting games in which the bettor is given a limited time to make a move in order to obtain a combination of signs or graphic representations that is favored with a certain prize.

The bettor can choose the combination and specific number of paylines he prefers, understanding as such those that identify a specific combination of symbols.

The maximum and minimum amount of each game will be visible on the gaming platform and expressed in Argentine peso currency.

The game will have a minimum duration of three (3) seconds and the bettor will be able to configure it in manual or automatic mode, and in the latter case, more than one hundred (100) games cannot be configured. You can change the mode at any time, either from manual to automatic mode or vice versa.

Progressive jackpots consist of accumulated prizes that are made up of the amounts obtained from the bettors' participations.

The play will be resolved using a Random Number Generator. Once the resulting combination of the play has been determined, if it is favored with any of the prizes established in the prize plan, it will be registered in the bettor's game account.

#### **Article 10.- Online roulette**

It is a game of bets, of the so-called counterpart, in which the possibility of winning depends on the coincidence of the bet made by the bettor with the symbol, number, color or location of the box in which the ball stops or another representation that is used within a rotating horizontal disk and divided into radial boxes identified by numbers, letters, colors, or any other graphic representation.

The game begins with the time available to the bettors to place their bets. The accepted bets will be available to be consulted at the time of starting the game.

Once the time allowed for placing bets has ended, the roulette will begin its spin. The result will be determined by a Random Number Generator. The bets that would have been winners and the value of the prize obtained in each case will be shown, under the provisions of the prize plan.

The prizes that correspond to the winning bets will be determined by multiplying the amount of each of the winning bets by the coefficient established for each of them in the prize plan.

Online Roulette game tables can be included in which several bettors can participate simultaneously, all of them linking their luck in the play to the result that occurs. At the tables of several simultaneous bettors, a period of time will be established prior to the throwing of the ball for the bettors to place their bets, which will be equal and simultaneous for all.

## **Article 11.- Black Jack online**

It is a counterpart betting card game whose objective is to reach or approach a sum of twenty-one points or less than twenty-one in a hand of cards without exceeding this limit.

It is played with six English decks of fifty-two cards each, excluding the wild cards, except that in some form of this game it is specified and is made known to the bettor before starting the game.

The cards have the following values:

The figures have a value of ten points.

The ace has a value of one point or eleven, depending on the bettor's convenience

The remaining cards have their face value.

The game begins with the random shuffling of the cards and their distribution to the bettors is done through a Generator of Random Numbers.

Each hand begins with the period bettors have to place their bets. The hand that plays the bench must always follow the rules as stipulated in each modality. Each hand will follow the normal order of distribution and card request.

At the start of the play, the bettor will find the possible combinations and the minimum and maximum value of the bets that can be made in each play according to the prize plan.

You can find Black Jack tables online where several bettors place their bets simultaneously, all of them linking their luck in the hand to their own move against the bank, or even the same bettor occupying the position of several bettors and behaving like multiple individual punters. In these cases, all bets made by bettors must be individually and in counterpart against the bank, and joint or cross bets are not allowed.

At tables that allow simultaneous betting, a period of time will be established prior to the start of the card deal for bettors to place their bets, which must be the same and simultaneous for everyone.

At the end of each hand, the results obtained in the play of each bettor are shown, indicating the total score to which each play amounts and the prizes obtained in each case as appropriate.

## **Article 12.- Online poker**

The online poker game is a game of mutual or counterpart betting cards in which several bettors face each other or against the bank, in order to obtain some of the card combinations that, according to the value assigned by the rules of the game and in relation to the combinations of the other bettors who have not withdrawn from the game, allows you to win the bottom of the game, the part of it that may correspond to you or the corresponding prize to multiply the value of the bet by the established coefficient.

The dynamics of the poker game successively alternate rounds, in which bettors place their bets with rounds in which cards are dealt with the intervention of a Random Number Generator. The objective is to get a combination of cards that, depending on the game variant chosen, allows you to obtain the game fund, or part of it that corresponds to it.

The online poker game can take place in cash or tournament mode. In the cash mode, the bettor may enter or leave the game at any time, being able to make effective the prizes obtained in each of the hands in which he has participated until the moment in which he withdraws from the game. In tournament mode, the bettor participates in successive tables, competing to eliminate other bettors until he is the winner. Participation in the tournament modality requires the payment of a registration and participation fee.

In cash mode the game fund is constituted with the amount of the bets made by the bettors on each hand, and in the tournament mode it comes from the registration fees, deducting the corresponding commissions.

The dynamics of the game begins with betting rounds and card distribution according to the specific operations that are found. determined in the rules of the game.



The prizes and coefficients by which they are calculated in each modality are determined in the prize plan.

At the end of each hand, the results obtained in the play of each bettor are shown, indicating the total score to which each play amounts and the prizes obtained in each case, as appropriate.

It can be developed in one of the following variants:

No Limit Poker: There is no maximum bet and the bettor may bet any amount he has at the table before starting the hand and as long as the rules of the game allow.

Limit Poker: In this variant, and in some betting rounds determined by the chosen variant of the game, bettors may not raise their bet more than the amount equivalent to twice the highest initial bet.

Poker limited to the prize fund: the maximum bet is limited by the amount of the prize fund in play.

### **Article 13.- Point and Online Banking**

It is a mutual betting card game, which pits several bettors against each other. The online gambling agency acts as an intermediary and guarantor of the amounts wagered between the bettors.

The game consists of reaching in a hand of cards the sum of nine points or a sum that approaches it without going over and that is greater than the value of the hand that plays the bank.

It is played with six decks of fifty-two cards each, excluding wild cards. The cards have the following value:

The figures have a value of zero points;

The ace has a value of one point;

The ten has zero value

The remaining cards have their face value except the ten that has zero value.

At the moment of starting the play, the bettor will find the possible combinations and the minimum and maximum value of the bets that can be made in each play, according to the prize plan.

Each card hand starts with the period that bettors have to place their bets, and once they are done, continues with the deal of cards.

All bettors must be able to access the bench on a rotating basis. In case you lose the right to continue with it, your passage to the next bettor must be in a rotating order. Likewise, the cases in which a better may renounce the right to become a bank will be established.

You must inform about the value of the bets and which bettor corresponds the hand.

At the end of each hand, the results obtained will be shown in the bettor's hand and in the bank's hand, indicating the total score to which each play amounts. If the winner of the hand is the dealer, the amount of the loss suffered by the bettors will be shown. If, on the other hand, the winner is the bettor's hand, the prize money amount obtained by each of the bettors will be shown. If there is a tie between the bettor's hand and the bank's hand, this circumstance will be shown and the amount of the bets returned.

The amount of the prizes that correspond to the winning bettors and their determination will be made in accordance with the provisions of the prize plan.

For a point and banking game to start, the participation of at least two contestants with a maximum limit of twenty will be necessary. However, point and banking game tables may be included in which counterpart bets are allowed, where a single bettor can practice the game against the bank.

### **Article 14.- Online Lottery Games**

They are games in which prizes are awarded in cases where the number, combination of numbers, signs or graphic representations, expressed in the ticket or its electronic equivalent, coincide in whole or in part with that determined by a draw or event held in a date previously determined according to the prize plan.

The amount of the prizes that correspond to the winning bettors and their determination will be made in accordance with the provisions of the prize plan.

#### **Article 15.- Online sports betting**

Sports bets are those in which the predictions fall on the result of one or more sports events or competitions, included in the programs previously established by the organizing entity, or on sports events or activities that are part of or are carried out within the framework of such events. The organization of these events corresponds to persons, associations or entities independent of the Online Gambling Agency, and whose results are uncertain and unrelated to the Online Gambling Agency and to the bettors.

Regarding the betting modalities, these may be mutual, counterpart or cross. In relation to the first two modalities, these in turn can be simple, multiple or combined.

Simple bets must be made within the fixed time limit, which will be prior to the start of the sporting event contained in the betting program. In the case of multiple or combined bets, bets must be placed before the start of the first event, in chronological order, of the contents of the bet.

The bettor will know the coefficients on which he places the bets and the prizes will be calculated in case they are winners, according to the prize plan.

The prizes will be awarded when the predictions contained in the bets coincide with the result considered valid according to the prize plan. Regarding official sporting events, the result determined by the organizing entity will be taken as valid.

In the event of suspension or cancellation of sports events established in the betting program, the collection of prizes obtained by bettors for bets made prior to the suspension or cancellation will be guaranteed.

Pando Agustina  
Chief Conductor

LOTTERY OF THE CITY OF BUENOS AIRES S.E.



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**Report**

**Number:** RESDI-2019-80-GCABA-LOTBA

Buenos Aires,

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**Reference:** EX-2018-31933557- -MGEYA-LOTBA Annex II

**ANNEX II**

**REGULATION OF THE DEMANDABILITY REQUIREMENTS OF THE GAMES CREATED BY RESOLUTION OF THE BOARD OF DIRECTORS RESDI-2018-321 -LOTBA**

**CHAPTER 1 - GENERAL CONDITIONS.**

**Article 1 .- Object.**

The purpose of these regulations is to establish the requirements for the enforceability of games created by Resolution No. 321 -LOTBA / 18, establishing the substantial principles regarding the rights, obligations, criteria for granting and expiration of Online Gambling Agencies; to the method of capturing and collecting Online Games; and to the approval and requirements of technical systems.

**Article 2.- Granting.**

LOTBA SE may grant qualifying titles for the commercialization and / or distribution and / or sale of the games provided for in Article 1 of Resolution No. 321-LOTBA / 18 and / or those that in the future complement and / or replace it as established in Articles 2, paragraph e) and 6 of the aforementioned Resolution.

The procedures for the granting of qualifying titles as Online Gambling Agencies will start from the call made by LOTBA SE and will be substantiated according to the principles of advertising, competition defense, competition, equality, dissemination, efficiency and effectiveness. , reasonableness, transparency and objectivity.

In order to ensure free competition, a minimum number of three (3) Online Gaming Agencies will be authorized, and the marketing and / or distribution and / or sale of online games must be started simultaneously. Likewise, the exclusivity of the offer in the marketing and / or distribution and / or sale of an event or sports tournament will be strictly prohibited. The LOTBA SE call will establish the requirements to be met by those interested in obtaining an enabling title for the marketing and / or distribution and / or sale of online games, among which are:

1. In the case of human persons, prove identity by photocopying the National Identity Document.

1. In the case of legal entities, attach: a) Constitution, bylaws and its regulations, if applicable; b) list of partners updated to the filing date; b) conformation of the current administrative body, attaching the acts of appointment of authorities; c) formation of the current inspection body, attaching the appointment minutes; d) description of its corporate purpose as defined in its statute, which must be directly linked to the activity regulated in Article 1 of Board Resolution No. 321-LOTBA / 2018.

2. In case of acting by a representative or attorney, they must prove the legal status invoked. To this end, evidence of the power conferred or the instrument from which the powers of representation arise must be attached.
3. Accredited domicile in the Autonomous City of Buenos Aires.
4. Establish an electronic address to which LOTBA SE will send all communications.
5. Certificate of non-existence of debt granted by the Registry of Food Debtors / Defaulters.
6. Evidence / Report on the initiation of universal lawsuits (bankruptcies - bankruptcies).
7. Proof of registration with the AFIP.
8. Proof of registration in Gross Income / Multilateral Agreement.
9. Accredited economic and financial solvency, being able to attach to such effects: a) in the case of human persons, a sworn statement of equity, indicating Current and Non-Current Assets and Liabilities; Total income corresponding to the last TWO (2) years, both documents certified by a public accountant with the legalization issued by the competent professional council b) in the case of legal persons, the financial statements of the last 2 business years closed on the date of presentation of the information - in accordance with the legal deadlines - audited by an independent public accountant with the legalization issued by the competent professional council; Equity statement at the end of the previous month of the presentation of the information, if the closing date of the business year exceeds five months from the date of filing with this Company. Said statement must be certified by a public accountant with the legalization issued by the competent professional council c) all other accounting or commercial information that is suitable for this purpose.
10. Affidavit duly signed by the interested party, his representative or attorney, from which his statement arises if he is not included in any of the prohibitions and incompatibilities established in Board Resolution No. 321 - LOTBA / 18. The signature of said declaration must be certified by a notary public.
11. Accredited your technical capacity to distribute and sell online games by attaching in your presentation a technical project that contains the background you had on the activity, its business structure, work teams, technology providers and all other information that it deems pertinent for this purpose. .
12. Present an operational plan for the marketing and / or distribution and / or sale of the online games that are the subject of the call. Said plan must contain the programs of: a) design and development of the commercialization and / or distribution and / or sale of the games including the prize programs attending to the modalities of the bets included; b) marketing; c) promotion and marketing; d) training of its personnel; e) responsible gaming program; f) money laundering and terrorist financing prevention policy.
13. Present the guarantee proposals to be constituted in accordance with the requirements established in the specific regulations, indicating the issuing company and the conditions of the policies.
14. Present an affidavit on the status of Politically Exposed Person of the interested party, their representative or attorney and their authorities. The signature of said declaration must be certified by a notary public.
15. Present an affidavit indicating who / is in the quality of final beneficiary / entities of the entity, in the terms established in the General Resolution of the General Inspection of Justice 7/15 and / or the one that in the future replace it and / or complement it. The signature of said declaration must be certified by a notary public.

All documentation must be presented in Spanish.

No qualifying titles will be granted if the aforementioned documentation is not duly registered before the corresponding Registries or Organizations. Notwithstanding this, the interested parties may start their presentations attaching proof of the start of the corresponding registration procedures, and must subsequently prove the final proof of registration.

Likewise, the person interested in obtaining the enabling title must report any modification that occurs in relation to what has been presented –within 15 days after it occurs-, accompanying the corresponding supporting documentation.

LOTBA SE will resolve the granting or denial of the qualifying title as Online Gambling Agencies taking special consideration in:

- a) The protection of the public interest;

- b) The protection of minors;
- c) Responsible gaming policies;
- d) Market conditions and
- e) The presentations made by the interested parties within the framework of the corresponding call, especially in that related to the responsible management of the game and the technical solvency to guarantee it.

**Article 3.- Duration.**

The qualifying titles granted by LOTBA SE for the marketing and / or distribution and / or sale of online games will have a maximum term of five (5) years and may be extended at the discretion of LOTBA SE for a period of the same duration, provided that The online gambling agency maintains the standards and requirements established by LOTBA SE for its granting.

**Article 4 .- Operations. Monetary unit.**

The acquisition and withdrawal of funds corresponding to credits for participation in online games must be carried out in Argentine pesos. Online gambling made in foreign currencies or non-legal currencies is not allowed.

**Article 5.- Grounds of extinction.**

The enabling titles granted for the marketing and / or distribution and / or sale of online games will expire in the following cases:

- a) By decision of the Online Gambling Agency in accordance with the conditions established by LOTBA S.E.
- b) By the course of the established period of validity, without requesting or granting its extension.
- c) By resolution of LOTBA SE expressly confirming the concurrence of any of the causes of extinction that are detailed:
  1. The loss of any of the conditions that determined its granting.
  2. To become superveningly involved in any of the prohibitions, incompatibilities or inabilities provided for in current regulations.
  3. The death or supervening disability of the online gambling agency, when it is a human person, the dissolution or extinction of the company, or the definitive cessation of the activity of marketing and / or distribution and / or sale of online games in the case of a legal person.
  4. The bankruptcy declaration of the online gambling agency.
  5. The application of the revocation sanction.
  6. Failure to comply with the essential obligations of the Online Gambling Agency.
  7. The transfer or transfer of the enabling title, without the agreement of LOTBA SE
  8. Obtaining the enabling title with falsehood or alteration of the conditions that determined its granting.

**CHAPTER 2 - OF THE BETTERS AND THE BETS.**

**Article 6 .- Prohibitions.**

Without prejudice to the prohibitions established in Law No. 538 (text consolidated by Law No. 6.017) and in Article No. 9 of the Board Resolution No. 321 -LOTBA / 18 may not bet:

- a) Those under 18 years of age;

b) Those legally unable to contract;

c) Those registered in the Self-Exclusion Registry created by LOTBA SE;

d) The personnel linked to the "online" gaming agencies in the games they distribute and sell, these being understood by those workers who intervene or may influence the development of the activity. Neither may their shareholders, owners, their management personnel, as well as their spouses or partners, ancestors and descendants in the first degree, regardless of whether the participation in the games, by any of the above, occurs directly or indirectly, through third human or legal persons.

e) Athletes, coaches, referees or other direct participants in the event or activity on which the bet is made, as well as their spouses or partners, ancestors and descendants in the first degree, regardless of whether participation in the games, by part of any of the above, is produced directly or indirectly, through third human or legal persons.

f) The managers of the participating entities or organizers regarding the sporting event or activity on which the bet is made, as well as their spouses or persons with whom they live, first-degree ancestors and descendants, regardless of whether participation in games, by any of the above, is produced directly or indirectly, through third human or legal persons.

g) LOTBA SE staff pursuant to Board Resolution No. 113 -LOTBA / 17 and / or in which it is amended and / or replaced in the future.

If by mistake, omission and / or deceit on the part of the bettor, bets are accepted and these are awarded, they will be considered void. In no case will a prize be paid for a void bet. LOTBA SE as appropriate, will apply blocking sanctions immediately and preventively without prejudice to complaints and / or civil and / or criminal actions that may correspond.

#### **Article 7.- Register of Gamblers and Prohibited.**

LOTBA SE will create an online gamblers registry. Likewise, you will have access to the personal data indicated in the user account of the bettors, respecting the provisions of National Law No. 25,326 on Data Protection and all regulations that in the future supplement and / or replace it.

Likewise, LOTBA SE will have a registry of prohibited online games, in accordance with the provisions of Article 6 of this annex. Online Gambling Agencies must establish a preventive control procedure to block the interaction of the prohibited subject in the events / games in which the prohibition applies.

#### **Article 8 °.- User Account.**

In order to participate in any of the online games created by Directory Resolution No. 321 -LOTBA / 18, the bettor must previously create a user account, in which they must generate their profile by completing the information required in the registration process.

The Online Agency must ensure the following premises:

a) In no case may participation in an online game be allowed without prior registration.

b) At the moment of opening the user account, the person must be identified individually with at least the following information: Name, Last Name, Identity Document, Address and Email Address.

c) Adopt the precautions in order to comply with those identification and due diligence requirements established in the rules and regulations on the prevention of Money Laundering and Terrorism Financing.

d) The account linked to a bettor will be considered personal and non-transferable, as well as the funds deposited in it.

e) The account can only be used by its owner, who will be responsible for the use of their credentials to access it.

#### **Article 9 °.- Betting.**

Bets for online games must be made by the bettor from his user account and using the funds available in his game account. At the online gambling agency the bettor will find the offer of online games, the types of bets allowed for each one, the prize plans and other related information, as well as the specific regulations for each type of online game in force by LOTBA SE

**Article 10.- Prohibition of means of payment for debit cards and / or transfers of savings banks of plans or social assistance programs.**

The transfer of funds or debit cards from savings banks for the payment of social assistance plans or programs, and / or accounts opened at the request of the National Administration of the Social Security (ANSES) or the entity that administers the corresponding payments, for the accreditation of social assistance benefits from programs, entities or services of the Nation, of this or other jurisdictions.

**CHAPTER 3 - ON-LINE GAME AGENCIES.**

**Article 11.- Obligations.**

Online gambling agencies must comply with the following obligations:

- a) Age verification: technical validation procedures must be established in order to comply with the prohibition of participation of minors under 18 years of age in online games.
- b) Advertising and promotion: responsible gaming standards established in this and the other applicable regulations that are issued must be followed.
- c) Responsible gambling tools for bettors: the tools must be available so that the bettor can establish spending limits, time per session and frequency of play. LOTBA SE will establish default values for the limits established by the bettor, which will be mandatory for Online Gambling Agencies.

Likewise, LOTBA SE may establish fixed limits of expense, loss and time as they arise from the best practices of Responsible Gaming worldwide.

- d) Self-exclusion: the possibility of self-exclusion of a site must be available to the bettor.
- e) Responsible Gambling Content: Information related to responsible gambling and sources of help must be available within the gaming platform.
- f) Training: user service personnel must be trained in responsible gaming.
- g) Prevention of Money Laundering and Terrorism Financing: the current regulations and the regulations on prevention of money laundering and terrorist financing issued by LOTBA SE must be complied with

**Article 12.- Guarantees.**

In order to carry out the activity of the commercialization and / or distribution and / or sale of online games, the online gaming agencies must constitute guarantees in favor and to the full satisfaction of LOTBA SE and / or the Government of the Autonomous City of Buenos Aires.

The amount of the same will be established by LOTBA SE, who may request its adjustment at any time and / or request the additional guarantees that it deems necessary in accordance with the development of the activity, within the period determined in each case.

The online gambling agency must grant LOTBA SE and the Government of the Autonomous City of Buenos Aires a guarantee of indemnity regarding the consequences of their activity and the relationship with the bettor.

**Article 13.- Control Tools.**

The online gaming agency must implement tools that allow LOTBA SE to carry out real-time control and monitoring of the marketing and / or distribution and / or sale of online games.

**Article 14.- Commission.**

The commission of the online gambling agency will be up to twenty percent (20%) of the gross collection for bets, and will be comprehensive of all the expenses that must be incurred to develop the marketing activity and / or

distribution and / or sale of online games such as: the organization of marketing and promotion, content providers, data providers, payment services, technological infrastructure, maintenance and administration, among others.

#### **Article 15.- Suspicious and / or Unusual Operations.**

In the case of detecting suspicious and / or unusual operations that are included in the provisions of National Law No. 25,246, its regulations and / or any regulations that will replace it in the future, the Online Gambling Agency must send in time and forms LOTBA SE reports, documentation, background and all other related elements, as established in Article N ° 16 of Board Resolution N ° 321-LOTBA / 18 and all other regulations that LOTBA SE dictates in due course.

#### **Article 16.- Breaches.**

Failure by the Online Gaming Agency to comply with the provisions contained herein and the applicable rules that are issued, will lead to the application of the penalties of warning, fine, suspension and / or revocation of the title granted.

Without prejudice to the application of the corresponding sanctions, LOTBA SE may order the suspension of the enabling title as a preventive measure and denounce the fact before the Public Prosecutor for the possible commission of any of the contraventions typified in Title V of Book II of the Code. Contravencional of the Autonomous City of Buenos Aires approved by Law No. 1,472.

#### **Article 17.- Sanctioning Principles.**

When applying a LOTBA SE sanction, the principles of rationality and proportionality must be taken into account, paying particular attention to:

- a) The seriousness of the event and the potential damage it may have caused.
- b) Vulnerability to the gambler's rights.
- c) The intensity of the violation of the habitual practices carried out by a good businessman.
- d) The antecedents registered in the Sanctions Registry.
- e) The amount involved in the game

### **CHAPTER 4 - APPROVAL AND REQUIREMENTS OF THE TECHNICAL SYSTEM.**

#### **Article 18.- Homologation and Standards.**

Online gaming agencies must have software, hardware, gaming equipment and other components necessary for the development of the activity certified by international laboratories recognized by LOTBA SE

The approval of the Technical System used for the marketing and / or distribution and / or sale of online games, as well as the necessary specifications for its operation, must comply with the technical requirements contained in Annex III and current regulations.



Pando Agustina  
Chief Conductor

LOTTERY OF THE CITY OF BUENOS AIRES S.E.



## GOVERNMENT OF THE CITY OF BUENOSAIRES

"2019 -Year of the 25th Anniversary of the recognition of the autonomy of the City of Buenos Aires"

### Report

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### ANNEX III

#### CHAPTER 1 - ON THE SYSTEMS.

##### Article 1 ° - Technical System

The Technical System is the set of processes, system modules, hardware, software, databases, and computer infrastructure used by the Online Gaming Agency for the marketing and / or distribution and / or sale of online games. It supports the operations necessary for this purpose, recording gaming and economic transactions between the bettors and the Online Gaming Agency and for this it must be located in a data center with a minimum level of TIER III (guaranteed availability of 99.982%, Redundancy N + 1 ).

This system must guarantee all the operations and transactions of the game carried out during the development of the game, including records, events, virtual processes, or any other information that is considered relevant.

Likewise, it must provide the necessary authentication mechanisms to guarantee the confidentiality and integrity in communications, the identity of the bettors, the transparency of the bets, control in relation to the duration of the game time, maximum amount played, use of the options self-exclusion, among others. In general, the control of the correct operation of the system, the secure access of LOTBA SE for the purposes of supervision and control, and the fulfillment of all the other requirements demanded in the current regulations on the matter.

The basic elements of this system are the Game Platform and the Internal Control System.

##### Article 2 ° - Gaming Platform

The gaming platform is the set of technical elements necessary to process and manage the operations carried out by bettors in games. It records all the operations from the access of the bettor, operations on the gaming accounts to the results of the events, of the operation of the platform, including the distribution of prizes, aggregated and control data.

This is understood as the technological infrastructure (software and hardware) that constitutes the main interface between the bettor and the Online Gambling Agency. The gaming platform offers the bettor the necessary tools to open or close their user account, record and edit their profile information, deposit or withdraw funds from their game account, and view the detail or a summary of their movements. account.

The gaming platform includes any technical element that shows relevant information to the bettor about the games offered by The Online Gambling Agency, as well as any client software that the bettor has to download and install on their computer in order to interact with it.

They are part of the game platform:

- a) User management module: contains the functions for registering, canceling and modifying users, identity and prohibited control, game parameters, including responsible gaming tools, and all the functions associated with user administration.

b) Game software: Contains the modules that allow you to manage each of the games, authorize and implement the rules for each of them.

c) Random Number Generator - RNG: A hardware or software system that generates the random number that will define the outcome of some of the online games of luck and chance, must be statistically independent, unpredictable and pass several statistical tests that guarantee randomness. of their results; must be certified by an international laboratory recognized by LOTBA SE

d) Gaming databases: Set of databases that record and preserve the personal data of gamblers in games, related to all transactions made by them, regarding information on event results , coefficients and other relevant data for the purposes of the development and management of gaming activities.

e) Payment gateway: Set of systems and technical instruments that allow economic transactions to be carried out between the bettor and the Online Gambling Agency, in order to feed or decrease the balance in the bettor's gaming account.

### **Article 3.- Internal Control System**

The Internal Control System is the set of components intended to record the operations and transactions carried out in the development of the games, in order to guarantee LOTBA SE the possibility of maintaining permanent control over the gaming activities of the Game Agency online.

You must have all the security and connectivity conditions for data capture from the Gaming Platform and the consultation or extraction of information from LOTBA S.E

The Internal Control System shall maintain all historical records for the term of the title that enables the operation of online games, of which at least two (2) online and the remaining years in backup devices.

### **Article 4 °.- Technical Project**

The Technical Project is a document that must be presented by the interested party to LOTBA SE at the time of making its presentation and its purpose is to describe the architecture of the Technical Gaming System and each of its components in aspects such as technological architecture, the bases of data, operational processes and procedures, information security used for the operation, and the integration characteristics of all the components that ensure the correct operation of the system.

The Technical Project must address at least the following aspects for each of the components of the Platform of Game and Internal Control System:

- Application architecture
- Data architecture
- Technological architecture and the location of its infrastructure
- Definition of integration with means of payment.
- Definition of integration with games.
- Identification of the third-party components used by your gaming platform and the means of payment.
- Previously obtained certifications. In addition, it must contain a separate or chapter that describes the following aspects

Administrative:

- Verification mechanisms of the bettor's identity.
- Responsible gaming tools, prevention and intervention.
- Business Impact Analysis Report (BIA) identifying the operational and economic impacts in the event of a disaster event, as well as the recovery times established for the Online Gaming Agency.

## **CHAPTER 2 - ABOUT USERS**

### **Article 5 .- User Registration Process**

The registration and identification process of the bettor is in charge of the Online Gambling Agency. In order to guarantee the conditions required to access the games through a user account, the Gaming platform must have a registration form to be completed by the bettor in order to access the platform's offer of games.

This process must be carried out by bettors as established in the previous paragraph. The massive inclusion of users will not be allowed through database migration, or any other automatic mechanism that does not comply with the user registration procedures authorized by LOTBA S.E.

This form must contain the following minimum data: Identification data:

- Type and number of identity document
- Full name and surname
- Sex
- Date of birth
- Place of birth
- Nationality

Contact information:

- Home
- Email Address - Email
- Mobile phone

Likewise, the platform must have forms that allow the user to set the parameters of the game with regard to the Responsible Gaming tools in accordance with current regulations.

The Online Gambling Agency must guarantee the correct identification of the bettors in the games they organize or develop: it must have a mechanism for verifying the identity data and sufficient date of birth to determine the veracity of the registration. This mechanism may be provided by third parties that provide professional identity verification services.

Pursuant to Article 7 of Annex II hereto, LOTBA SE will have a Single Register of Gamblers for online games.

The Single Register of Gamblers will be fed by the user accounts generated through the registration processes that each online gambling agency has. In order to comply with this requirement, the Online Gaming Agency must send the corresponding information according to the data model and periodicity established in the current regulations.

Participation in any online game will not be allowed without due inclusion in the Single Register of Gamblers and verification of the provisions of Articles 6 and 7 of this Annex. The account created in each online gambling agency is considered personal and non-transferable, as well as the funds found therein.

The Online Gambling Agencies must register and keep all the procedures, queries and requirements that they would have carried out for the verification of the data provided by the applicants, as well as how many documents they have received or used for this purpose. The data must be kept, along with those corresponding to the user registration process, during the period of validity of the user account and for the six years following its cancellation or cancellation.

#### **Article 6.- Verification of Self-Excluded.**

LOTBA SE will provide online gambling agencies with an online service to verify the identity and date of birth of those who are in the Self-Excluded Registry: the verification service will be based on the bettor's DNI, or any other Identification number proving identity in accordance with current regulations.

The online gambling agency will record and keep any queries made to the Self-Excluded Computer Registration System (SIRA), recording the date, hour and minute of the query. The data must be kept, along with those corresponding to the user registration process, during the period of validity of the user account and for the six years following its cancellation or cancellation.

LOTBA SE will provide online Gambling Agencies with two online verification services for the registration of bettors:

- A verification service for the registration of a bettor in the Computer System for Self-Exclusion Registration based on the National Identity Document. Online Gambling Agencies should use this service to allow enrollment in the user registration process.
- A consultation service of the variations (additions / cancellations) in the registration in the Computer System of Self-Exclusion Registry, corresponding to the bettors that the Online Gambling Agency had previously verified. Online Gambling Agencies must use this service periodically in order to verify variations in the enrollment in the Computer System of Self-Exclusion Registry of their bettors.

Each online gambling agency must have a mechanism that allows bettors to exclude themselves in accordance with the provisions of current regulations.

#### **Article 7.- Prohibited from the Game**

LOTBA S.E. will provide online gambling agencies with an online verification service for the subjects included in the Prohibited Registry of LOTBA S.E.

This verification service will be based on the bettor's DNI, or any other identifying number that proves identity in accordance with current regulations.

The Online Gambling Agency must make inquiries about the registration in the cases of:

- High User
- Payment of prizes

Likewise, it must establish a procedure with a minimum daily frequency in which it will verify existing users in order to keep its database updated.

In the aforementioned cases, the Online Gambling Agency must implement the preventive suspension of the user account and inform LOTBA S.E.

The online gambling agency will record and keep as many queries as possible from the Prohibited Registry of LOTBA SE, recording the date, hour and minute of the query. The data must be kept, along with those corresponding to the user registration process, during the period of validity of the user account and for the six years following its cancellation or cancellation.

Without prejudice to the provisions, the Online Gambling Agency must have its own detection mechanisms for the prohibited subjects according to Article 6 of Annex II, and must inform LOTBA SE of the detection in order to include them in said register for compliance.

#### **Article 8 °. - User Account and Game Account**

The user account will be made up of the gaming account, the latter will be made up of the credits for participation and the bonus credits of each bettor granted by the Online Gaming Agency.

The game account will allow the deposit / withdrawal of credits for participation in the games and will reflect all transactions involving changes in the bettor's balance, such as acquisition of credits, charges for participation in games and additional services that may be provided by the Online Gaming Agency, the released bonuses offered by the Online Gaming Agency and the prizes obtained by the bettor that will include identification of the bet made, the value of the bet, event in which it participates, type of bet, forecast made , coefficient assigned to the bet at the time it is made. Additionally, it will reflect the bonus credits offered by the Online Gambling Agency and that due to their conditions have not been released.

#### **Article 9.- Authentication and Password Policies**

Access to the platform of the Online Gambling Agency must have security mechanisms to authenticate the bettor in a reliable and secure way, that in case of using the password, its management policy must contemplate the following minimum requirements:

- An initial password must be set by default or by the bettor.
- The bettor must be informed of good practices in choosing strong passwords during the registration process (example: minimum length of 8 characters mixing alphanumeric characters, and the non-use of data such as name, pseudonym, surname or date of birth).

The online gambling agency must ensure computer mechanisms to validate the conformity of these good practices and inform the bettor if they are not being followed.

- The Online Gambling Agency must issue a password change reminder at least once every twelve (12) months, however, the bettor is not obliged to make the password change.
- The bettor and password identification and authentication mechanism must be blocked if there are five (5) attempts successive failures.

The Online Gambling Agency may provide other methods of authentication of the bettor as long as they offer a higher level of security than the password. The system must have and keep a record of all access attempts, whether successful or unsuccessful.

Once the bettor is authenticated, the system must show the date and time of the last access prior to the current one.

The Online Gaming Agency will have a documented security procedure for accessing the bettor's account, which describes:

- How the user account is protected from unauthorized access.
- The indirect or assisted mechanism or means by personnel of the Online Gaming Agency, to access the user account, after passing validation questions before granting access or renewing it.
- The treatment of bettor identifiers for lost or blocked passwords.

The Online Gambling Agency will have a documented process so that, in the event that a bettor has forgotten their password and / or system that replaces this type of access, they will re-authenticate the bettor and recover or restore it.

The Online Gaming Agency will have internal mechanisms to detect identity theft by analyzing sudden changes in the behavior of a bettor, and in particular the value of deposits or withdrawals, to prevent the user account from being accessed by a third.

#### **Article 10.- Verification and Authentication**

All modules of the Gaming Platform must extend the verification and secure authentication functionality of the bettor. Passwords and recovery mechanisms must ensure the integrity of transactions on the bettor's accounts.

#### **Article 11.- Gambling Account History**

Gambling accounts must contain at least the following information available to be consulted by bettors:

- Mechanisms and options for consulting and downloading your gaming account history related to balance / deposit / withdrawal movements in the last twenty-four (24) months, with the possibility of having older information through the corresponding request.
- Mechanisms and options for consulting and downloading your history of the participations or plays made in the last thirty 30 days, with the possibility of having older information through the corresponding request.
- Transaction report allowing you to check the time-stamped winnings and losses for each event in the game, as well as account balances.
- Corrections, cancellations or adjustments will be reflected independently, so that the bettor is allowed to differentiate them. The report must contain enough information for the bettor to compare the data with his own transactional records.

The operations or configurations made on the accounts by the Online Gaming Agency, or the transactions carried out by the bettor, must be recorded in a comprehensive, precise and intelligible manner for the resolution of any possible dispute.

The presentation to the bettor must include enough information to allow him to reconcile his transaction statement with his own financial records, such as his movements of deposits, withdrawals and tax information.

#### **Article 12.- Terms and Conditions**

The Online Gaming Agency must have the appropriate mechanisms to reliably validate the communications (notifications and contractual acceptances of the game) between the Online Gaming Agency and the bettor, as well as the acceptance of the Terms and Conditions of the Game, They must be registered with information on the date / time of the operation. The terms and conditions must be permanently available for consultation by the bettor.

#### **Article 13.- Redirection of platforms**

The Online Gambling Agency will establish the necessary procedures and mechanisms to guarantee that all the connections made through its platforms by bettors from the Autonomous City of Buenos Aires are redirected to the Technical System specified in this document.

The Online Gambling Agency must redirect to the specific website in accordance with current regulations. These mechanisms must be clearly identified, registered and audited.

## **CHAPTER 3 - ABOUT THE GAMES**

### **Article 14. – Minimum game requirements**

Online Gambling Agencies must implement on their Gambling Platform the necessary procedures to comply with the requirements established in current regulations in order to carry out the activity of marketing and / or distribution and / or sale of authorized online games.

The Online Gaming Agency will establish a procedure, which will be executed with a minimum monthly frequency, by means of which it will verify that its activity conforms to the qualifying titles it holds, that the modalities and variants within each type of game are in accordance with current regulations. at all times, as well as that the approved software versions are used.

The Online Gaming Agency will keep a record of the active games at all times, which will indicate the game, the modality or variant, if applicable, the commercial name and the approved version.

### **Article 15. - Prize plan**

The prize plans will be public and accessible to bettors and will include all possible winning combinations and a description of the prize corresponding to each combination.

The information on the award plans must clearly indicate whether the awards are quantified in a monetary unit or in some other established unit.

The information of the prize program will reflect any change in the value of the prize that may occur during the course of the game. For these purposes, it will be sufficient for the Online Gaming Agency to have and display a box in a prominent place in the graphic interface of the game in which the aforementioned changes in the value of the prizes appear.

When there are jackpots or multipliers of the prizes shown on the screens, it must be specified whether the pot or the multiplier affects the prize plan or not.

The Online Gaming Agency will keep a record of the prize plan for each game, so that these changes can be audited.

The prize plans may not be changed during the game, except in those cases where this fact is provided in the particular rules and the bettor is adequately informed.

### **Article 16.- Wells of the games**

Whenever the regulations of the corresponding games allow it, the Online Gambling Agency may create wells, accumulated wells, progressive wells or any other variant specified in the current regulations.

The online gambling agency will clearly inform the bettor when he is contributing funds to wells and how a bettor can qualify for them. All bettors who contribute to the pot must be eligible to win it throughout the game. The description of the conditions of the pot and the requirements to win it must be communicated to the bettor.

The conditions of the well must contemplate any conclusion or interruption, anticipated or unforeseen, of the game, as well as technical interruptions of the system.

The Online Gaming Agency will keep an accounting associated with the management of the wells that allows the control thereof, identifying as a minimum:

- The creation of each well.
- The periods of time each well has been active.
- The configurable characteristics of the well are active at all times.
- Games that participate in or contribute to the pot at all times.
- The balance of the pot at all times, differentiating the contribution to it from each type of game.
- The prizes awarded based on the pot, with details of the winner, amount and time it was produced.
  
- The registration of manual actions that affect the balance of the well.
  
- Transfer or redirection operations to another well.
  
- The closure of a well or the moment in which its withdrawal occurs.

The Online Gambling Agency must have a procedure that allows the control of the wells, guaranteeing that the well is created, managed, and granted in accordance with the rules of the game.

In particular, with a minimum monthly frequency, the Online Gambling Agency must check:

- The correct operation and the balances and movements of the wells.
- That once the well has been established and opened, the conditions do not change until it has been credited to the game of one or more winners
- That the winner determination procedure works correctly. The procedure must not allow the introduction winners who do not meet the conditions to be awarded, nor do not give as winners to those who do meet them.
- That the system awards the prizes to the bettors who appear on the list of winners.

If they exist, special attention will be paid to well redirection systems in which part of the accumulated well is redirected to another fund, where it can be subsequently won. The pit redirection system may not be used for the purpose of postponing the awarding of a prize indefinitely.

The inoperative of the well must be communicated to the bettors by displaying messages on their device as "closed well" or similar. It will not be possible to win an accumulated pot that is previously closed.

#### **Article 17.- Promotional offers**

If the conditions of the promotional offers establish an amount to accumulate, for example, points, the bettor must be able to consult the points that he has accumulated or those that remain to fulfill the conditions.

#### **Article 18.- Game sessions**

The platform of each online Gambling Agency will keep a record of the gaming sessions, with details of the session start and end times, the authentication mechanism used by the bettor, and the cause of disconnection or inactivity.

The Online Gambling Agency must guarantee that the time for disconnection due to inactivity of the bettor is a maximum of twenty (20) minutes; after this time, the platform must disconnect the bettor.

When the Online Gambling Agency makes basically one-way communications where the expected behavior of the bettor is passive, such as in the broadcasting of a live sports event, it may be understood that the bettor is still active, even if he does not take any action.

The bettor must be informed that the session has ended.

#### **Article 19.- Incomplete Game**

An incomplete game is one whose result has not yet occurred or, if it has occurred, the bettor could not be informed of this fact. In the event of an incomplete game, in accordance with current regulations the Online Gambling Agency must wait for the participation of a bettor or cancel the game or continue in it until it is completed. After the recovery of an incomplete game, the Game Platform must keep a record of the event, with its start, duration, and affected services for later review.

If the incomplete game is due to a loss of connection of the bettor's device, when the bettor reconnects, the platform will show at least the result and status of the bet made as long as the result of the bet has been generated.

The platform will keep a record of the causes of disconnection or inactivity of the bettor's sessions, with details of the start and end times of the session, as well as the authentication mechanism used by the bettor to reactivate their session. The Online Gambling Agency must have a documented procedure for managing incidents of unavailability of one, several or all components, including the associated technical measures for their recovery. The components must carry out a self-diagnosis, a check of the critical files and a check of the communications between the different components.

#### **Article 20.- Connection and Minimum Resources**

The Online Gambling Agency must introduce into its technical system all possible means to try to reduce the risk that certain bettors are at a disadvantage compared to others due to technical factors that may affect the speed of the connection.

The bettor must be informed in those cases in which the response time can have a significant impact on the probability of winning.



The system will inform the bettor of the unavailability of communication with the gaming system as soon as it detects it. The gaming software should not be affected by the malfunction of the devices of the final bettors, except for the implementation of the procedures provided to end incomplete games or games.

#### **Article 21.- Disabling a game or session**

The platform must consider that when there are exceptional circumstances, a game or game sessions are disabled, the record of the actions and the reason that originated them for a subsequent review remain.

The Technical System will keep a record of the interruptions and the affected services with their start and duration.

The Online Gambling Agency must have a documented procedure for managing incidents of unavailability of one, several or all components, including associated technical measures.

The components must carry out a self-diagnosis, a check of the critical files and a check of the communications between the different components.

The technical system must have the option for the Online Gambling Agency to be able to temporarily block the offer of a certain type of game for specific or required user accounts.

#### **Article 22.- Absent Participation**

In those games where tables can be found where several bettors can place their bets simultaneously, in accordance with current regulations, the platform can allow the bettor to establish a status of "absent" or "pause" that can be used if the bettor needs to stop playing for a short period that may never exceed twenty (20) minutes.

In the "absent" state the bettor cannot make new moves. If a move is made, its status will cease to be Automatically "absent". If the actions do not affect the game (for example, consult the help), the status of "absent".

#### **Article 23.- Automatic Game**

If the system offers advice on game strategy or automatic game functionalities applicable to slot machines or online gambling, such recommendations or functionalities must be truthful and comply with current gaming regulations.

The bettor will be guaranteed to maintain control of the game when the automatic game functionality is provided.

The bettor may control the maximum value of the automatic game or the maximum bet and the number of automatic bets. The bettor may deactivate the automatic game functionality at any time.

When the automatic game functionality is used, the information displayed on the device (duration, graphic elements or others) will be the same and will have the same characteristics as when the game is not automatic. The interface will additionally show the number of automatic plays elapsed or remaining.

The automatic replay functionality cannot disadvantage a bettor, and neither the sequence of the automatic games nor any strategy that is recommended to the bettor should be misleading.

In the case of games involving more than one bettor simultaneously, all bettors must be informed and accept a bettor who has established the automatic game functionality.

#### **Article 24.- Repetition of plays**

The platform will be able to provide the bettor with the option of repeating plays, showing it as a graphic reconstruction or an intelligible description that must reproduce all the sets of the game that may have an impact on its development.

### **CHAPTER 4 - ABOUT THE RANDOM NUMBER GENERATOR (RNG)**

#### **Article 25.- RNG HARDWARE**

In the case of using a hardware RNG, it must meet the same requirements, adapted to the technical characteristics of the hardware and, if it exists, prove that the personnel who operate it cannot influence the results. In the cases of using a hardware RNG operated by personnel, the Online Gaming Agency must have a procedure to minimize the hypothetical risks that could affect the generation of results.

#### **Article 26.- Operation of the RNG (Random number generator)**

The Random Number Generator must meet, as a minimum, the following requirements:

- The generated random data must be statistically independent.
- Random data must be evenly distributed within the established range.
- Random data must remain within the established range.
- The random data generated must be unpredictable (its prediction must not be possible by computation without knowing the algorithm and seed).
- The generated data series must not be reproducible.
- The random number generator will be cryptographically strong.
- Different instances of one RNG should not be synchronized with each other in such a way that the results of one would allow the prediction of the other.
- Seed / reseed techniques should not allow predictions to be made about the results.
- Generation mechanisms must have successfully passed various statistical tests that demonstrate their character random.
- The technical system can share an RNG or an instance of it for one or more games if this does not affect the random behavior of the system.

#### **Article 27.- RNG failures**

The Online Gaming Agency must implement a RNG monitoring system that allows it to detect its failures, as well as mechanisms that disable gaming when a failure occurs in the RNG.

#### **Article 28.- Application of the RNG in games**

Random events must be governed exclusively by the random number generator and there must be no correlation between some moves and others. The game must not rule out any chance event, except in those cases in which that circumstance is contemplated in the game rules.

The game must not manipulate chance events, either manually or automatically, or to maintain a minimum return percentage to the bettor.

When the game rules require a sequence of chance events to be drawn (for example, the cards in a deck), the chance events will not be resequenced during the course of the game, except in those cases where this circumstance is contemplated in the rules of the game.

The range of RNG values must be precise and not distort the current game rules.

The symbols or results of the game must not be influenced or controlled by any factor other than the numerical values derived from the RNG.

#### **Article 29.- Game logic controls**

The game must be designed to minimize the risk of manipulation. Technical, organizational and procedural measures that prevent behaviors that deviate from the rules of the game will be adopted.

The Online Gaming Agency will have a documented procedure that describes the measures that it applies in its system to guarantee that:

1. The game is played according to the rules of the game.
2. Game data is recorded in the system.
3. The receipts or identification documents of a bet or participation are protected against possible manipulation.
4. The system controls the time to market betting or participation. The moment in which the commercialization is closed must be that established in the rules that regulate the game and in any case it will be before the end of the event that triggers the result of the game.
5. The system controls the established prize pools, if applicable.
6. The procedure for determining winners works correctly, and does not allow the introduction of winners who do not meet the conditions to be awarded or to give as non-winners those who do.
7. The system will award the prizes to the bettors who appear on the list of winners effectively.

8. All types of transactions that can be created during the operation of the game, including those dedicated to handling exceptions, changing system parameters, cancellations, actions in manual mode, must be registered in the system, along with the corresponding audit trail. .

9. Any modification, alteration or deletion of the data must leave an audit trail, especially when there is manual intervention.

#### **Article 30.- Logic independent of the user device**

All the functions that are critical for the implementation of the rules of the game and the determination of the result must be generated by the Game Platform, independently of the user device.

### **CHAPTER 5 - ABOUT PAYMENT METHODS**

#### **Article 31.- Means of Payment**

The online gambling agency must request information from the bettor or payment methods to acquire or withdraw credits for participation.

The Online Gambling Agency must verify the following:

1. Guarantee that the withdrawal of funds from gambling accounts can only be carried out by identifying the bettor registered in the user account that makes the request.
2. Guarantee that the means of payment used have the same ownership as the user account, avoiding the participation of third parties in the financing of bets or the collection of prizes.
3. When the means of payment are products offered by the banking / financial system, they should be only those offered by entities authorized to operate in the territory of the Argentine Republic.
4. Payment methods whose origin account is destined to the payment of social assistance plans or programs, and / or accounts opened at the request of the National Social Security Administration (ANSES) or the entity that administers the payments may not be used. that corresponds, for the accreditation of social assistance benefits from programs, entities or services of the Nation, from this or other jurisdictions, as established in Article 10 of Annex II hereof.

At all times a bettor must be able to withdraw the funds they have in their gambling account, for this the Online Gambling Agency must establish a procedure to order the transfer of funds to the payment method requested by the bettor within a maximum period of time in accordance with The current regulations, in the exceptional case of not being complied with, the problem presented must be reported to LOTBA S.E.

All these transactions must be denominated in Argentine Pesos.

The Online Gambling Agency may save the financial information of the bettor in order to speed up subsequent processes, guaranteeing its confidentiality.

#### **Article 32. - Transfer of Funds**

The Online Gambling Agency must guarantee that no gambling account has a negative balance and must prevent any transaction or participation in the game without an available balance.

Notwithstanding what is established in the previous paragraph, the Online Gambling Agency will have a documented procedure to correct possible errors that may temporarily produce credit balances as a consequence of errors of the Online Gambling Agency or corrections in the results of the events. real object of award. This procedure will include a record of them identifying the cause and their rectification.

The Online Gambling Agency will establish the necessary technical procedures to prevent the transfer of credits for participation between gambling accounts associated with different betting registers.

#### **Article 33. – Procedure for Control of Payment and Collection Operations**

The Online Gaming Agency will implement a procedure with a minimum monthly frequency to control the payment and collection operations with respect to the contributions in the gaming account or in the gaming software, which will include at least:

- Gaming accounts associated with gambler records in a state other than active (self-excluded) do not make movements other than those established in this regulation.

- The verification of the deposits and withdrawals of funds that correspond to the values of operations carried out through the means of payment.
- Verification that the bettors have not acquired credits for the participation above the limits that it had each of them fixed.
- Verification that transfer orders to the bettor's bank account for withdrawal are made within a period not longer than that established in current regulations.

#### **Article 34. - Limits for the acquisition of credits for participation**

The Online Gaming Agency must have a procedure to guarantee that the deposit limits established by the bettor are met and will keep a detailed record per user account with the modifications in the limits of acquisition of credits for participation in the games. The record shall include the date and reason for the modification and the record of the modification requested by the bettor must be recorded.

### **CHAPTER 6 - ON RECORDS**

#### **Article 35.- Data protection**

The Online Gambling Agency must establish the appropriate technical procedures to maintain what is designated in Law No. 1845 (text consolidated by Law No. 6017) and other concordant norms, as well as those that modify, replace, add to or complement it.

Online Gambling Agencies must also establish the security measures established in the databases and files in accordance with current regulations on data protection.

#### **Article 36.- Privacy policies**

The Online Gaming Agency will publish its privacy policy on the gaming platform and its acceptance will be part of the user account registration process. The platform will record the bettor's acceptance and the content of the privacy policy or a link to its text. Any subsequent modification of the privacy policy will require its communication to the bettor and its acceptance.

The Online Gaming Agency will have a technical and operational plan to ensure the privacy of the data of the bettors by virtue of what is established in Law No. 1845 (text consolidated by Law No. 6017) and other current regulations.

#### **Article 37.- Records and Traceability**

The Online Gaming Agency will keep records and logs of all the operations of the bettor that have an impact on the development of the game, on the user account, on the gaming accounts or on the means of payment, for a minimum of six (6 ) months counted from the moment of creation of the registry. The information from older months must be available in external storage for the purposes of possible consultations during the term of the enabling title.

All transactions that affect the account balance such as deposits and withdrawals must be logged in for audit. The online gambling agency must keep a record of all the authorization codes that the means of payment issue authorizing monetary transactions during the term of the enabling title.

Once the qualifying title has been completed, the Online Gambling Agency must guarantee the delivery of master data and registration of operations, through migration procedures and all other pertinent documentation, regardless of the means or medium in which they are located, in accordance from LOTBA SE

In relation to the game development data, the stored data must allow to reconstruct all the operations of the game that could have an impact on its development.

The Online Gaming Agency must record the information corresponding to the user's income to the system (login), containing at least the date and time (expressed in hours: minutes; seconds), IP address and any other relevant data in accordance with current regulations .

Likewise, it must contain an audit log that will include all the operations carried out on the Gaming Platform or the Internal Control System by technical users and other people related to the Online Gaming Agency, LOTBA SE and those authorized by it.

### **CHAPTER 7 - ON RESPONSIBLE GAMING**

#### **Article 38.- Responsible Gaming**

Regarding the protection of bettors, the following measures should be taken:

- a) The game interface must permanently present a clearly visible table containing adequate information on the money spent / played and the display of time during the session and per day.
- b) All interactive interface with the bettor must present in a clearly visible place a permanent message of responsible gaming that will be defined by LOTBA SE. You must have the ability to link or redirect to other addresses on the internet and / or make calls using "click-to-call" technology.
- c) Establish a self-exclusion procedure according to the LOTBA SE Responsible Gaming Policy
- d) Include mechanisms and functions that allow the bettor to use the Responsible Gaming tools defined in current regulations.
- e) Adopt all current regulations on the matter.

#### **Article 39.- Process of "Time out" and Self-exclusion**

"Time Out": Bettors must have a simple mechanism on the system platform that allows them to take time off the platform for a specific period of time, as established in current regulations.

During this period of time out, the Online Gambling Agency must guarantee that the bettor does not carry out operations related to gambling in accordance with the provisions of current regulations.

Once the period requested for the "time out" has elapsed, the user account will automatically resume. Self-exclusion: it must contain a simple mechanism that allows bettors to register in the Self-Excluded Registry.

In the self-exclusion process, the online gambling agency must ensure that after confirming the self-exclusion, no gambling-related operations can be carried out in accordance with the provisions of current regulations. This self-exclusion event impacts all Online Gambling Agencies.

The Online Gambling Agency must have and securely manage the database of self-excluded gamblers and those who have requested "time out" where both events are recorded. In addition, you must implement mechanisms to ensure that in both cases, the bettor is not allowed to create another user account.

### **CHAPTER 8 - ABOUT PREVENTION OF FRAUD AND MONEY LAUNDERING**

#### **Article 40.- Measures to Prevent Fraud and Money Laundering**

Without prejudice to the LOTBA SE's Mandatory Subject status under the terms of National Law No. 25,246 (art. 20 inc. 3), the Online Gambling Agency will have procedures for the prevention of money laundering and terrorist financing. The procedures will include prompt notification of unusual and / or suspicious operations to LOTBA SE for investigation.

In live gambling, the Online Gambling Agency will have measures in place to mitigate the risk that some bettors may gain an advantage over other bettors by betting with information about a certain outcome or after an event that fundamentally alters the odds. of the bet.

#### **Article 41.- Preventive Suspension of User Accounts**

The Online Gaming Agency may - ex officio and / or at the request of LOTBA SE - preemptively suspend the bettor who has, in his opinion, engaged in fraudulent behavior or who has allowed the use of his user registration by third parties, until prove the facts.

The Online Gaming Agency will keep a record of suspended users. The record will include the date and reason for the suspension.

#### **Article 42.- Taxes**

The online gambling agency must implement mechanisms that can identify all profits subject to tax and provide the necessary information in accordance with current tax requirements in this area.

### **CHAPTER 9 - ON INTEGRATION WITH SUPPLIERS Article 43.-**

#### **Integration with suppliers**

The Online Gaming Agency will be responsible for the gaming operations carried out through third parties or providers. The technical systems of third parties or suppliers will be considered for these purposes part of the technical system of the Online Gambling Agency and must comply with the specifications established in the current regulations.

## CHAPTER 10 - ABOUT THE DEVICES

### Article 44.- Devices

Devices are considered to be the set of software and hardware elements that directly interact with the bettor. User devices are those elements that are provided by the bettor and that can be hardware elements, such as the personal computer, mobile phone or smartphone, or software elements such as the operating system or the web browser.

### Article 45.- Identification of devices

The platform must be able to identify the different types and versions of devices, and their records will be kept. Except for duly justified technical reasons, the platform must register if the bettor is using a specific solution provided for mobile devices.

### Article 46.- Consent to install components

If the use of the gaming system requires the installation of any component on the bettor's equipment, the express consent of the bettor must be required prior to installation.

### Article 47.- Reduced functionalities by other devices

Devices that have a graphical interface limited by size, such as mobile devices, compared to personal computers, must offer content to visually complement games as seen on other devices.

The platform may offer, for strictly technical reasons, derived from the characteristics of the device, different functionality in the different types of devices as long as these differences are identified and documented.

The bettor must be informed of the limitations of information or functionality of the device and client application that he is using, and expressly accept it.

The Online Gaming Agency will mitigate the risks derived from the lack of information or functionality on a certain device by offering the same information through other means.

Except for duly justified technical impediments, all the information that must appear on the game interface must also be displayed on all devices. When it is not possible to include all the information or links in the game interface, they will be offered from a link, from a menu or from another application on the same device, in accordance with LOTBA SE

The platform will not process the games on the device if it does not have all the minimum technical and connectivity resources to allow playing without technical problems and without disadvantages

## CHAPTER 11- ON THE INTERNAL CONTROL SYSTEM

### Article 48.- Internal Control System

The monitoring and supervision of the gaming activities carried out by the Online Gaming Agency will be carried out through of the internal control system (hereinafter, SCI), which the Agencies must implement.

The SCI must capture and record all gambling operations and economic transactions of bettors, whatever the means of participation.

The SCI must adapt to the different channels for the marketing of games and interaction with bettors, in such a way as to ensure the capture and registration of all the gaming operations carried out.

When different channels of marketing or interaction with bettors are used simultaneously in a single game, the Online Gaming Agency must establish the interfaces or communication channels between all the means of participation or interaction in the game in order to enable LOTBA SE to access all the operations and transactions that would have been carried out whatever the means used for it.

The Online Gaming Agency must establish and maintain a secure communication line for access by LOTBA SE, as well as a consultation and data download service permanently available for LOTBA SE

### Article 49.- Access to data

The SCI will keep the following accesses permanently open for LOTBA S.E:

- An access through the SFTP protocol to download the information.

- SSH access with read-only attributes and sufficient permissions to list and display the content of the entire store.
- The Online Gambling Agency will provide the following authentication methods to LOTBA SE
  - For manual access, username and password.
  - For automated download, the Online Gaming Agency will configure key pair exchange (SSH keyswap) for the same user described in manual access.

Notwithstanding the foregoing, LOTBA S.E. may require the implementation of interactive reports in accordance with specific designs in accordance with current regulations.

The Online Gambling Agency can use various databases. The data must be communicated only once, avoiding that the different databases contain redundant information.

#### **Article 50. - SCI data model**

The SCI data model contains the scope of the data that must be registered, their update period and the technical requirements for availability and access, in the terms established in the current regulations on the matter.

#### **Article 51.- SCI time source**

The internal control system will be synchronized with a layer NTP server

1. All the temporary information reported in the SCI must include the time zone taken as a reference by including the positive or negative deviations from UTC -3 times.

#### **Article 52.- Security of the SCI**

SCI is considered a critical component. The security requirements established in Chapter N ° 12 of Annex III apply to the ICS. The SCI must be able to record transactions at all times and permanently. The Online Gambling Agency must design the availability, the information loss prevention plan, the disaster recovery time and the business continuity fulfilling this requirement.

#### **Article 53.- Unavailability of the SCI and suspension of the gambling offer The Online Gambling Agency must suspend the gambling offer in the event of unavailability of the internal control system.**

In the event of a SCI unavailability of less than 24 hours, the Online Gaming Agency may continue its gambling offering as long as it is able to continue recording transactions pending the SCI's availability again. The online gambling agency will suspend the gambling offer due to an unavailability of the SCI of more than 24 hours.

In the event of loss of information in the SCI, the Online Gambling Agency must have a procedure for re-extraction of the lost information that allows the loss to be corrected within a maximum period of one week.

Any loss of information that affects the SCI must be communicated to LOTBA SE immediately, indicating an evaluation of the loss, as well as the plan of measures to be applied.

#### **Article 54.- Quality of SCI information**

The Online Gaming Agency must have a documented procedure to control the quality of the SCI data. This procedure, must be carried out with a minimum monthly frequency, will include at least the following checks:

- That data includes all bettors registered with the Online Gambling Agency.
- That the economic data includes all gaming transactions for the period, including deposits and withdrawals, as well as that the figures obtained correspond to the official figures of the Online Gambling Agency.
- That the balances of the bettors' accounts are adequately reflected in the information of the internal control system.
- That the monthly files for the period have been generated, as well as the daily files for each of the days of the period.

The Online Gaming Agency will keep the documentation of the result of the previous checks, including in this documentation the date of completion, the signature of the person responsible by the Online Gaming Agency, the main figures, economic and number of Registered users, transmitted in the files of the internal control system, as well as their contrast with the official figures of the Online Gambling Agency.

The Online Gambling Agency must be prepared to rectify the incorrect data within a maximum period of one month through new extractions.

#### **Article 55.- Business continuity in the SCI**

Given that the unavailability of the SCI leads to the suspension of the gaming offer, the Online Gambling Agency must have a **business continuity procedure that**, in the event of a disaster, allows the SCI **to be operational in less than a month.**

#### **Article 56 - Conservation of SCI information**

The online gambling agency must keep your data for the **duration of the enabling title.**

They will also have the obligation to facilitate and allow LOTBA SE online access to the information corresponding to the last 12 months of activity registered in it.

Online Gambling Agencies must have a procedure for recovering the information corresponding to the period of validity of the enabling title.

#### **Article 57.- Registration according to the marketing channel**

Certain participation devices and procedures have specific registration requirements for gaming operations. These requirements will not affect other communications between the Online Gambling Agency and the bettor other than those related to the development of the game.

These specific devices and procedures will be applied to the recording of messages sent and received for gaming activities carried out through text messaging, through landline or mobile telephone services, or through audiovisual media.

### **CHAPTER 12 - ON SECURITY AND MANAGEMENT**

#### **Article 58.- Security of information systems**

The technical system security requirements that are established are intended to protect user records and their associated game accounts, as well as guarantee that the game develops correctly.

#### **Article 59. - Critical components**

The critical components are the elements whose security must be reinforced, since their impact on the development of the game is important.

The critical components are:

- In the user registration, game account and payment means processing: the components of the Game Platform that store, manipulate or transmit sensitive customer information such as personal, authentication or economic data and those that store the punctual state of the games, bets and their result. If applicable, this requirement is valid for self-exclusion processes.
- In the random number generator: the components of the Game Platform that transmit or process random numbers that will be the object of the results of the games and the integration of the results of the random number generator into the logic of the game.

- **Connections with LOTBA S.E.**

- **The internal control system**

- Access points and communications to and from the above critical components.

- Communication networks that transmit sensitive information from gamblers.

#### **Article 60.- Security management of the technical system.**



The Online Gambling Agency must implement a security management system, which will especially protect the critical components referred to in the previous article.

The security procedures should be aimed at implementing specific security measures, based on a risk assessment. The Online Gambling Agency must plan the periodic reviews and make the reviews derived from the significant changes.

#### **Article 61.- Risk management**

Risk management will identify the elements to protect, and then carry out a periodic identification, quantification and prioritization of the risks to which the technical gaming system is subject. Risk management should be reflected in a plan of measures.

#### **Article 62.- Security in communication with bettors**

The Online Gaming Agency must establish the systems and mechanisms that guarantee the confidentiality of the gambler's communications with its technical gaming systems and, in particular, with the Gaming Platform and its replica. Communications will be encrypted in cases of transmission of personal data (user registration) or economic.

In relation to communications, the Online Gambling Agency will adopt the necessary measures to guarantee the integrity and non-repudiation in cases of transmission of personal or economic data, and in transactions involving participation in gambling.

#### **Article 63.- Communications and operations management**

The safe and correct operation of the technical gaming system must be guaranteed, as well as communications:

- a) Critical components must be monitored to avoid using different versions of the approved one.
- b) Communication between the components of the technical gaming systems will guarantee integrity and confidentiality.
- c) The tasks will be segregated between the different areas of responsibility, to minimize the possibility of unauthorized access and potential damage.

Development, quality and production tasks will be separated.

The services provided by third parties must include controls and security metrics in the contracts, and must be periodically audited and monitored.

Protection measures will be taken against malicious code.

Backups should be made regularly with the appropriate frequency and kept in custody as stated in the backup plan.

Security measures will be adopted in the communication network.

Security measures will be adopted in the handling of portable media as well as its safe deletion or destruction, which will be reflected in a documented procedure.

Clocks for all components, especially critical ones, should be synchronized with a reliable time source. The reliable time source may not be the same for each component. The Online Gaming Agency will establish measures and controls to avoid tampering with the timestamps or their subsequent alteration, especially in the audit logs.

The audit log of activities of all users, exceptions and information security events must be generated and kept during the term of the enabling title.

The audit records will be protected against alteration and undue access.

The activities of the system administrator of the Online Gambling Agency must be recorded.

A periodic analysis of the audit records will be carried out. Actions will be taken depending on the incidents detected.

#### **Article 64.- Management of security incidents**

The Online Gambling Agency must have a documented procedure for managing security incidents.

All security incidents must be recorded and the facts, impacts and measures taken will be clearly and concisely documented.

#### **Article 65.- Purchase, development and maintenance of systems**

The impact on security in the decision-making process for purchasing, developing and maintaining information systems should be analyzed.

#### **Article 66 ° - Change management**

From the beginning of its activity, the Online Gaming Agency must have a documented change management procedure, which controls changes in the equipment and components of the technical gaming system actually used.

There will be a formal internal approval process for all changes, which must involve the request for change and its approval by the corresponding managers.

In the case of changes in critical components, it must be evaluated whether it is a substantial change.

Requests for change and decisions made will be recorded and may be subject to subsequent audit.

Copies of the binaries of the software elements of all the software versions that have been used in the technical system will be kept.

Pando Agustina  
Chief Conductor

LOTTERY OF THE CITY OF BUENOS AIRES S.E.



## GOVERNMENT OF THE CITY OF BUENOSAIRES

"2019 -Year of the 25th Anniversary of the recognition of the autonomy of the City of Buenos Aires"

### Report

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### ANNEX IV

#### Comprehensive and Social Policy for Responsible Gambling

##### Background

There are a series of tools that have already been implemented in countries such as Spain, England and other members of the European Union, such as the self-establishment of money and time limits, monitoring and access to knowledge of the game profile itself, which includes the possibility of carrying out a self-assessment on behavior, as well as the decision of self-prohibition or also called self-exclusion, to play.

These tools have been tested to validate their efficiency and effectiveness through different studies. Some of them revealed that 49% of users considered it very useful to be able to know their gaming profile; 70% considered the implementation of a money limit useful, another 46% considered the possibility of carrying out a self-evaluation on their gaming behavior useful.

The Cambridge Health Alliance addictions division conducted a study in conjunction with the Bwin party, based on two-year monitoring of 48,114 online gamblers from more than 80 countries. The conclusions thrown on responsible gaming tools were highly positive, it was shown that those people who had self-imposed a monthly money limit decreased their frequency of play, proving their effectiveness in protecting the bettor. This study also sought to identify risk patterns to predict future problems with gambling; managing to identify four markers: Increase in the frequency of play, increase in the volume of play, a lot of activity after registration, and erratic behavior (players who react strongly to winnings and losses).

##### Lines of action

1. Awareness: Raise awareness and inform the population about the characteristics of pathological gambling and its risks. Disseminate preventive measures, as well as the availability of access to free treatment and assistance devices.
2. Prevention: Implement actions aimed at educating and raising awareness about responsible gaming behaviors, in order to minimize risks and guarantee the protection of the most vulnerable groups. Also promoting healthy play in children, adolescents and the elderly, through the creation of recreational spaces.
3. Orientation and Assistance: Guarantee access to information and interdisciplinary treatment of gambling addiction through different healthcare devices.
4. Research: Develop lines of research around the expansion of the game, and the new modalities that arise as a result of market advances. To deepen the studies carried out around the prevalence of pathological gambling and the behavior of gamblers.

## **General measures**

In order to ensure the protection of users of online gaming platforms and the prevention of their use by minors and vulnerable groups, Online Gambling Agencies must complete the following general and specific measures:

1. Provide the public with clear, correct and precise information on the main aspects of Responsible Gaming, which must be available on all pages and / or mobile applications.
2. Offer gamblers the option of taking a self-assessment test to help them gain a better understanding of their gambling risk.
3. Train betting service personnel to provide guidance on responsible gambling.
4. Establish a visible link or visible figure, on the web home page, and / or mobile applications, with information on the orientation line to the problem player and the Responsible Gaming web page.
5. Inform in the case of free games: when you go from those to a paid one, the bettor must receive a notice stating such circumstance, and will be warned of the subjective prohibitions of access to the game (disabled, self-excluded, etc.)
6. After creating a new user, their identity must be validated against the self-exclusion registry. If you are enrolled in it, the registration process cannot be completed.

## **Age limit / child protection**

1. Inform about the age limit allowed to play.
2. Online Gambling Agencies must have a registration process that requests and verifies the identity and age of users.
3. Try to include parental control links to prevent minors from accessing.

## **User tools**

The tools detailed below must be made available to the bettor. They will allow the bettor to manage his behavior towards the game.

1. Self-exclude from online games of all authorized; To this end, LOTBA SE will have a self-excluded register.
2. Establish the term for which they wish to carry out self-exclusion, with a minimum of one (1) year and a maximum of five (5). Once the bettor has self-excluded the account will be suspended. LOTBA SE will establish the appropriate procedure for lifting it, provided that the minimum term has been met, and without having reached the maximum term established.
3. Without prejudice to the default limits established by LOTBA SE, the bettor may establish game control filters (self-limits) on the amount of time, deposit money, and / or losses.
4. Once the time limit is established, when it is reached, the game will stop. This stop will allow you to consider the bettor if it is time to move on to another activity.
5. Incorporate a "Cool off or Time out" mechanism, the bettor may request a time-out period that may be: 24 hours, one week, one month, or any other term with a maximum of 6 weeks.
6. Establish an alert system about the playing time and amount lost, which indicate to the bettor when his playing behavior is close to reaching the limits established in his user account.
7. Have a gambling profile that allows the bettor to know their behavior, their gambling patterns and the risk associated with them, as well as tips to reduce their risk of developing a problem.

8. Establish real references: the game screens must contain adequate information about the money spent / played and the display of time during the session and per day.

9. On mobile devices, the incorporation of the responsible gaming legend, always visible to the user, will also be mandatory; it must also incorporate notifications of real references, where adequate information about the money spent / played, time during the session / day and different recommendations to users after certain periods of time, so they can take a break from the game.

### **Economic transactions**

1. Loans cannot be granted to users.

2. Loans between bettors are prohibited.

3. The interface of the gaming platform must not induce the bettor to recoup his losses.

4. Deposit limit: is the amount of money you can deposit weekly. Setting this limit is mandatory for all bettors and is part of the registration process. This amount may be modified.

### **Advertising**

The objective of these measures is to improve consumers' knowledge of gambling and its risks, adapting advertising and ensuring that it reaches the consumer transparently and responsibly:

1. Be truthful and therefore not misleading.

2. In line with Responsible Gaming standards, you may not be induced to inappropriate guidelines or behaviors that could lead to problematic or pathological gambling.

3. It must contain the legend established in Article 1 of Law No. 4,182 (text consolidated by Law No. 6017), along with the orientation line created by the City of Buenos Aires Lottery.

4. Socially responsible, so that gambling is not associated with personal, social or professional success, or gambling is compared with work, study or effort, undervaluing the latter.

5. Responsible informing of the prohibition to play to those under 18 years of age and avoiding that minors appear in advertisements or are directed at them.

6. Adequate to protect other vulnerable groups, such as those registered in the Self-Exclusion Registry or those legally incapacitated.

7. Those registered in the Self-Exclusion Registry may not receive any communication regarding advertising that promotes or encourages the game according to its different formats, whether by mail, text message, telephone call or others.

8. Any application to adhere to the loyalty programs of people who are within the Self-Exclusion Registry must be rejected.

9. You should not spread false expectations about your chances of winning, nor suggest that skills may influence results that are due to chance.

10. You must not promote the consumption of alcohol or tobacco during the game.

11. It should not suggest that gambling brings social acceptance, or the solution of personal or economic problems

12. All advertising must be outside children's channels and child protection hours.

### **Responsible Gaming Standards**

1. Online Gambling Agencies must comply with the responsible gaming standards that LOTBA S.E. determines from time to time.
2. Develop a responsible gaming program.
3. Perform the certification of the same within the terms established by LOTBA S.E.

Pando Agustina  
Chief Conductor

LOTERIA DE LA CIUDAD DE BUENOS AIRES S.E.