



The deadline for responses to this consultation is the **16th of February 2018**. Respondents are of course welcome to comment on any or all of the areas addressed by this consultation.

1. INTRODUCTION

Q1. Are there any issues that arise from this part and for which you would like some further explanations or would you like to make a comment?

2. CUSTOMER DUE DILIGENCE

Q1. Do you agree with the National Betting Authority's interpretation of the CDD requirements?

Q2. Do you understand the requirements for CDD measures and when these should be carried out?

Q3. Do you understand the requirements for SDD and how and when this is applied?

Q4. Do you understand the requirements for EDD and how and when this is applied?

Q5. Do you consider any requirements to be excessive or unable to be achieved? If yes what alternative measures do you suggest??

Q6. Do you agree with the principle that the client generates a business relationship with the Class B bookmaker from the moment of registration on the bookmaker's website?

Q7. When do you believe an occasional transaction takes place? Are the requirements for CDD for occasional transaction feasible to be implemented?

Q8. Do you have any other comments that you would like to bring to the Authority's attention?

3. CUSTOMER DUE DILIGENCE THRESHOLD

Q1. Do you agree with the National Betting Authority's interpretation of the new threshold requirements?

Q2. In which of the following situations do you consider that it is necessary to apply CDD measures:

- To all new customers irrespective of threshold?
- To new customers that reach the threshold?
- To existing customers that reach the threshold?
- When the operator becomes aware that the circumstances of an existing customer relevant to its risk assessment for that customer have changed?

Q3. Do you agree with the Authority's interpretation of linked transactions? Do you want to add any other situations as to when transactions should be considered linked?

Q4. Do you consider that transactions should be considered to be linked if the same customer has carried out a new transaction(s) in another bookmaker(s) in the same day for the same game?

Q5. Do you consider that it might be better to perform CDD on all new or existing customers irrespective of transaction threshold, from the day that the Law will be in force so that there will be no necessity to worry about transaction thresholds? In this case you will only be concerned with obtaining additional EDD in case of PEPs and/or other high risk situations.

Q 6. Do you believe that the application of a "Player's Card" could largely eliminate the problems of identifying due diligence measures if the customer achieves the threshold?

Q7. Would you agree with the implementation of such a card? What are your concerns on the possible implementation of a player's card?

Q8. What is the duration (length of time) that is appropriate to exist between the customer and the bookmaker, in order to be conceived that the customer has entered into a business relationship?

4. KNOW YOUR CUSTOMER (KYC) REQUIREMENTS

Q1. Do you agree that the KYC documents should be collected by the bookmaker when the player has reached the threshold?

Q2. Do you agree that bookmakers should be able to identify transactions that are linked?

Q3. Do you agree with the National Betting Authority's suggestion for collection of documents for KYC requirement purpose?

Q4. Do you have any other suggestions?

5. RISK ASSESSMENT AND RISK-BASED APPROACH

Q1. Do you understand the requirements of the Risk Assessment and the Risk-based approach?

Q2. Do you understand how the risk-based method should be used?

Q3. Do you foresee any areas in which complications may exist in the risk based methodology?

Q4. Which areas do you consider as high risk from the gaming sector products offered by the licensees?

6. POLITICALLY EXPOSED PERSONS (PEPs)

Q1. Is the meaning of a PEP understood well? Is there any aspect which requires further explanation?

Q2. What measures do you think need to be implemented by an authorized representative or responsible person to know if the client is PEP?

Q3. What measures do you think Class A Bookmaker should apply to know if the client is PEP?

Q4. Is it clear when enhanced Due Diligence measures should apply?

Q5. Is it clear what type of additional measures are necessary to be performed?

Q6. Do you have any concerns with regard to the requirements to be applied for PEPs?

Q7. Do you agree that the decision to accept or carry on a business relationship with a PEP should require approval by the senior management?

Q8. What responsibilities should the authorized representative or the person responsible have, if they don't realize that a customer is PEP?

7. COMPLIANCE OFFICE

Q1. As bookmakers are required to have an in-house compliance officer and assistant, please indicate whether you consider this requirement reasonable and what additional costs and impacts, if any, would be incurred by your business?

Q2. Do you believe the compliance officer needs to be certified having passed specialised exams?

Q3. If your answer to question 3 is positive, do you believe that these exams should be specialized just for the gaming industry or should they be for other obliged entities and industries?

Q4. Are there any implications that the National Betting Authority should be aware of?

8. TRAINING

Q1. Do you agree that responsible officials must be trained?

Q2. Do you agree that the responsibility for training of responsible officials must lie with the bookmaker?

Q3. Do you agree that the recipient must keep a register, which will notify the Authority, with all the responsible officials that have been trained, citing the training they have received?

Q4. Do you think that the authority should organize specialized seminars and issue training certificates?

9. BENEFICIAL OWNERSHIP

Q1. Are the requirements regarding the beneficial ownership understood clearly?

Q2. Are there any aspects that require further explanation?

10. TRANSACTION MONITORING

Q1. Are the requirements regarding transaction monitoring understood clearly?

Q2. Do you have any questions regarding the method to be used for transaction monitoring?

11. REPORTING OF SUSPICIOUS TRANSACTIONS / ACTIVITIES

Q1. Is there any aspect which requires further explanation?

Q2. Is it clearly understood when, how and where STRs should be filed?

Q3. Is the role of the MLRO understood for filing SAR/STR?

Q4. Is there any point of reference from the above that causes you concern or worry of its execution?

Q5. Do you consider that the reference to one working day in point 11.2.4. as well as the way the Authority suggests handling such a case to be reasonable and feasible in its execution;

Q6. Are the red flags listed in point 11.2.7 understandable; Is there any red flag that you disagree on the way that it should be handled?

Q7. Do you think that in the case where it is determined that a suspicious transaction has taken place, should in addition to the FIU, the Authority also be informed?

12. RECORD AND DELETION OF DATA

Q1. Are there any questions with regard to the retention of personal data?

Q2. Are there any questions with regard to the deletion period for personal data?

Q3. Is there any further question regarding the above to which you would like further explanations or clarifications?

13. GENERAL COMMENTS

Are there any other issues would like to discuss or bring to the Authorities attention?