

MAY 14, 2012
GAMING POLICY COMMITTEE
PRESENTED BY BWIN.PARTY
PL

Security in Online Poker

Protecting the Public

May 2012

Maintaining A Safe Environment

Regulated jurisdictions have a range of tools and processes to maintain a safe environment that:

- Blocks access by minors
- Blocks access from unauthorized jurisdictions
- Promotes responsible gaming
- Prevents financial fraud and money laundering
- Ensures honest games
- Prevents hacking

The Nevada Gaming Commission has adopted stringent regulations requiring operators to use these or similar tools and processes to protect the public.

Blocking Access by Minors

New players have identity verified against personal ID, publicly available databases, and government controlled databases.

Authorized players enter username and password to gain access to service. Q&A and token code used for additional security.



| | |
|-------------------------|------------------------------|
| Title: | Mr |
| First name: | Bradley |
| Last name: | Smith |
| Date of birth: | 01 January 1976 |
| Email: | bsmith100@gmail.com |
| Social security number: | 530 52 xxxx |
| Driver's license: | 123456781234 |
| Country: | USA |
| ZIP code: | NV 89138 |
| Address: | Apartment 22A Main Street |
| City: | Las Vegas |
| State: | Nevada |
| Contact number: | 555-135-6789 |

Accept Terms & Conditions:

Create my account

Please log in

Account Name:

Password:

Question:

Answer:



The Process in Action - Denmark

| Process Step | Consumer Action | Operator Verification |
|---|--|--|
| Capture personal details | Consumer completes required fields. | CPR, Denmark's national identification number, must be entered and in format of valid CPR number to continue application. |
| Consumer confirms s/he is of age | Consumer first checks box confirming s/he is of age. | Application cannot be submitted without checking box. |
| Consumer provides payment details to make deposit | Consumer enters valid payment details (i.e. debit card) to make deposit. | Operator checks CPR against CPR registry. If automated check fails, application is reviewed by agent, who requests and reviews CPR ID within 30 days or the account is suspended. |
| Consumer logs in to poker software | Consumer enters username and password plus government-issued secure code on each log-in (NemID). | NemID is a government-issued secure code solution using physical codes issued to consumers. Each code can be used once. After entry by customer, code is verified in real time by connection to NemID. |
| Consumer requests withdrawal | Consumer can request withdrawal <u>only</u> to same debit card used to deposit. | Before permitting withdrawal, and assuming no alerts are triggered, operator's cashier conducts automated check against operator's back office to confirm CPR check complete and NemID was used at log-in. |

In Nevada, operator or service provider has 30 days to verify consumer's personal details

Blocking Access From Unauthorized Jurisdictions

Location of new players is captured at registration stage.

| | |
|----------------------------|-------------------------------------|
| Title: | Mr |
| First name: | Brody |
| Last name: | Smith |
| Date of birth: | 01 January 1976 |
| Email: | brody100@gmail.com |
| Social security number: | 550 52 xxx |
| Driver's license: | 223456789234 |
| Country: | USA |
| ZIP code: | NV 89108 |
| Address: | Apartment 21A |
| | Main Street |
| City: | Las Vegas |
| State: | Nevada |
| Contact number: | 355-133-6789 |
| Accept Terms & Conditions: | <input checked="" type="checkbox"/> |

[Create my account](#)

Location of registering players confirmed by:

- Address entered by player
- Physical location of registering players (to state level) is verified in real-time by IP address
- New players can be required to provide government-issued ID and bank account from that jurisdiction.

Returning players verified against physical location when seeking on-going access to service.

Please log in

Account name:

Password:

[Log in](#)

Physical location of returning players is verified in real-time against IP address.

In Nevada, operator or service provider will use geo-location technology to provide IP location information to detect if player is in Nevada.

Responsible Gaming – Player Controls

Authorized players have tools to limit future deposit amounts and review historic transactions.

→ New Daily Deposit Limit :

→ New Weekly Deposit Limit :

→ New Monthly Deposit Limit :

Transaction History

Summary as of: April 26, 2012
You last logged in on: April 26, 2012

Choose a specified date range and the transaction type you want to view.

Transaction History

Authorized players control amount of money they deposit in given time period. Operator may also give players ability to set wagering limits.

Players can review 12-month transaction history to keep track of wagering.

Authorized players have tools to self-exclude.

Select the period you wish to close your account for

- 1 week
- 1 month
- 3 months
- 6 months
- Until

Authorized players cannot access account during cool-off period, and all targeted promotional activity is suspended.

In US, we would provide players with loss limit, time-based loss limit, session time limit, and time-based exclusion.

Responsible Gaming – Background Checks

New players are checked against internal and government watch lists. They can also be checked against regulator databases.

Existing players are checked against updated versions of these lists – matched players are denied access to play.



In Nevada, operator or service provider will verify that registering players are not self-excluded or on list of excluded persons established pursuant to NRS 463.151 and corresponding NGC Regulation 28.

Preventing Fraud & Money Laundering

For debit cards, user must have complete card details. Operator can verify details against cardholder's issuing bank.

VISA DEBIT Amount: * 150

VISA DEBIT Card Number: * XXXX567891011234

Exp. Date: * 07 2014

CVV2/Security Card Code: * 755 ⓘ



Verified by VISA Your Bank

Please submit your Verified by Visa password.

Merchant: ExampleCo

Amount: 150

Date: 26.04.12

Card number: XXXX XXXX XXXX 1234

Password:

Forgot your password?

Submit Help Cancel

- Your bank's logo
- The name of the retailer that you are shopping with
- The value of the purchase
- Today's date
- The last four digits of your card number

Operators can restrict withdrawals only to same method of payment and require security test.

VISA DEBIT Amount: * 200

Prevents money being "laundered" and complements other steps to prevent player collusion.

Operators also implement automated checks to identify and flag suspicious activity on account, requiring manual review prior to authorization.

Additional requirement to pass extra security test is provided as option to players.

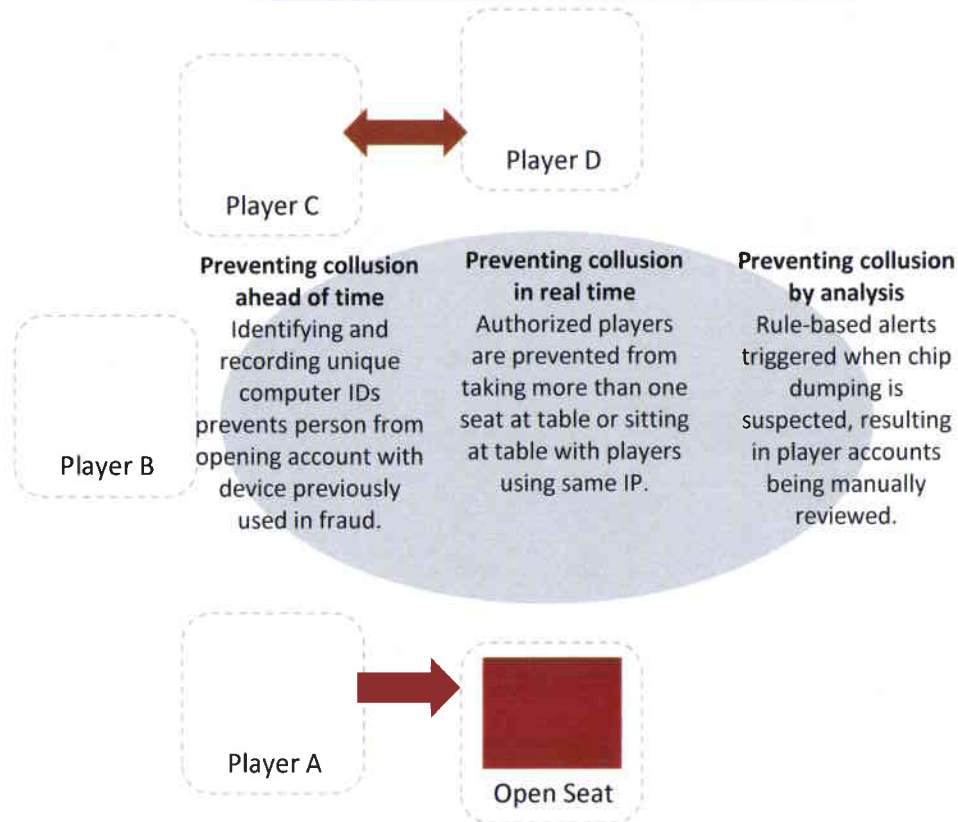
Security question answer:

Withdraw

Game Integrity

Authorized player activity is analyzed by automated tools and agents to identify collusion.

Use of bots prohibited by policy and identified by process.



A bot is a program able to play poker on its own.

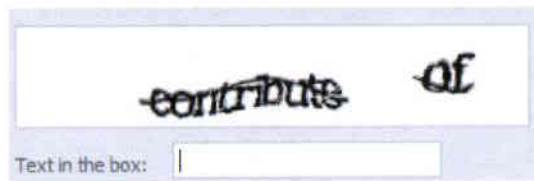
A series of algorithms analyzes player's game play against known bot patterns to trigger investigation and block suspected bot accounts.

Algorithms are continually evolved to keep up with bot development.

Disconnection policy protects players who genuinely lose Internet connection during game play, but procedures ensure players cannot abuse protection.

Blocking Hackers

Internet gaming system protected from unauthorized access by those attempting to hack authorized player accounts.



After multiple failed log-ins, a CAPTCHA (*Completely Automated Public Turing test to tell Computers and Humans Apart*) is issued.

At log-in, gaming system performs checks on device to identify suspicious activity recorded previously from that device.

Authorized players are notified of last account activity to alert them to any activity that is not their own.

You last logged in 04/25/12 at 08:07 EDT

Internet gaming system protected from those attempting to connect to it with rogue software.



Software installed on player's device communicates with central operations in proprietary code that is also encrypted.

System prevents hackers from corrupting the gaming environment.

Protecting player data

- **Encrypted communications**

All gaming communications between customer and operator are encrypted to prevent fraudulent snooping and manipulation

- **PCI: Certified protection of debit and credit card data**

VISA and Mastercard industry standard that ensures correct handling of payment card data.

- **Customer database: defense in-depth**

Customer gaming and personal data is stored in the gaming environment perimeter and is not extracted unless encrypted

- **Regular security testing**

Security reviews of application and infrastructure modifications, regular testing by external third-parties

Operators enforce the highest standards of operational integrity to maintain player trust.

Without trust, an operator will not stay in business.

Thank you