

**What is the gambling license type for a B2C?**

An online B2C license that covers all verticals.

**How many URL's are included with a Licence?**

Five (5) URL's are included within the License Fee, however, additional URL's can be added at further cost.

**Are B2Bs required to be licensed?**

Whether a B2B License is required will depend on the nature of the business. We will advise upon this on a case by case basis.

**For how long are Licenses valid?**

Licenses are valid for a period of one (1) year.

**What is the application timeframe?**

The typical time-line for the completion of the application is between two (2) to three (3) weeks after pre-approval. However, the application can take as long as eight (8) weeks in certain circumstances.

**How is the application submitted?**

Through the online portal.

**Is there a pre-application fee?**

Yes.

A non refundable pre-application fee is incurred.

**Is there a guarantee the license will be granted?**

The application fee does not guarantee that the license will be granted. However, should the application fail, then a partial refund would be provided.

**What payment methods are accepted?**

The vast majority of FIAT currencies (such as USD/EUR) and a range of the most popular cryptocurrencies, including: Bitcoin, Ethereum, ERC-20 based stable coins and a range of other ERC-20 tokens.

**What is the accepted game supply (Direct, Aggregator, Both)?**

Both.

**What games are not permitted?**

Physical prize raffles.

**What territories are restricted under the license?**

UK, USA, Ontario, New Brunswick and FATF sanctioned countries.

**All license holders must conduct their own due diligence in each local jurisdiction or territory in which they operate to ensure their services are provided in compliance in all material respects with all applicable local laws, rules and regulations**

**Are there any payment-blocking measures in place?**

- Licensees are required to geo-block consumers residing in the USA, the UK, New Brunswick, Ontario and FATF sanctioned countries
- Licensees are also required to block player registration from restricted territories

**Are there any ISP blocking measures in place?**

There are no ISP blocking measures in place through the license. Enhanced monitoring and supervisory services may be imposed upon a licensee at the licensor's discretion.

**Are there any geographical player-blocking requirements?**

- Licensees are required to geo-block consumers residing in the USA, the UK, New Brunswick, Ontario and any FATF sanctioned countries
- Licensees are also required to implement protocols to block player registrations from the restricted territories identified above

**Are there documentary requirements for the source of funds/wealth of the UBO/directors?**

- UBOs with a shareholding of 10% or more will undergo due diligence at the licensing stage. This will involve identifying the source of wealth and source of funds
- Typically, a letter from a chartered accountant or registered lawyer attesting to the above would be sufficient

**Should key Personnel be disclosed?**

Yes.

**Are there any wagering limitations?**

There are no wagering limitations imposed, however:

- There are reporting requirements on deposits of 10,000 Euros and above
- In certain scenarios, deposits close to the 10,000 Euro benchmark may also trigger a reporting requirement to the Differentia Licensing Advisory Group (DLAG)

**Are there requirements to segregate player funds?**

Yes.

- Licensees are required to segregate player funds from operational funds
  - Player funds should be held in a separate account

**Are there any requirements for player complaints procedures?**

Licensees must adhere to the following protocols:

- A clear internal complaints process
- Protocols for responding to the complainant promptly
  - Ensuring record retention of complaints
  - Providing escalation process
- An approved Alternative Dispute Resolution (ADR) mechanism for escalated complaints
- Upon request, DLG reserves the right to request KYC information that the licensee holds for the complainant in the event that complaints are escalated to the Tobique jurisdiction
- Player complaints are accessed through the shield if the licensee and player have been unable to find a resolution

**Are there any player reporting requirements?**

The following player reporting requirements are in place:

- Bi-weekly player account standing submissions
  - Monthly compliance change reports
    - AML documentation
- Terrorist activity reports (within 24 hours) uploaded to the TGC compliance platform
- Other requirements not listed in certain circumstances of which licensees will be informed

#### **Are there any Responsible Gambling obligations?**

- There are requirements for self-exclusion that need to be disclosed 24 hours after it is requested
  - Adherence to the protocols of each market you enter into and its terms
- Implementation of responsible gambling tools, such as the ability for players to set deposit limits, wager limits, cooling-off periods and session limits, is mandatory
  - Ensure there is a clear link to supportive organisations such as [omniahealthgroup.com](https://www.omniahealthgroup.com)

#### **Is there a requirement to appoint a compliance officer?**

There are no specific requirements for a compliance officer, however, it would be suggested as best practice. Please note that an MLRO is mandatory.

#### **What AML policies and obligations must licensees follow?**

Each market that is targeted must adhere to local requirements. For example, if you are in the EU, you have AML directives 4, 5 and 6 and any other local requirements of a member state.

#### **Are there any certification requirements?**

- RNG must be certified
- Functional and platform testing must be approved by a reputable jurisdiction, accredited or an up-to-date testing certificate supplied by a reputable testing house
- Testing may be requested before the licence being granted for function and platform

#### **Are there any key equipment reporting requirements?**

The Tobique Gaming Commission (TGC) requires the full and timely disclosure of all infrastructure of the licensee. This includes the location of the data centre, an architectural overview and a disaster recovery plan.

#### **Are there any server location requirements?**

No requirement for any physical server presence. Everything can be cloud based.

#### **Are there any data vault requirements?**

The TGC requires that critical data and information must be encrypted, backed up and secured off-site on a bi-weekly basis with a TGC-selected service provider, namely the following information:

- Receipts from players and evidence of payments to players
- A complete history of all transactions that affect player balances
- The backup should not contain personal information, however the Transaction ID, Player ID, amount and final account standing must be provided
  - No integration required

#### **What are the GDPR requirements?**

Licensees must comply with local data protection requirements for each territory targeted and a Privacy Policy must be present in the footer at all times.

#### **Is an onsite audit required?**

No.

**Are there marketing restrictions in place?**

Yes.

- Market specific
- Tobique does not permit marketing for its area or for restricted territories

**Technical standards**

- The website must have a footer containing specific information and policies, including an active Tobique Gaming Commission domain validation shield
  - Company information or "About Us"
    - A responsible gaming link
  - Complaints and arbitration information
    - Terms of Use.
    - Privacy Policy
    - Bonus Policy
      - Affiliates
  - AML & KYC policy
  - Payment policy
  - Contact us

**What must be displayed on the site?**

The website must have a footer containing specific information and policies, including an active Tobique Gaming Commission domain validation shield.

## Differentia Licensing Advisory Group provides a wide range of supporting services

### ACQUIRING, PAYMENTS & BANKING SERVICES

We have an extensive network in the payments and banking receivables environment and can probably secure preferential rates and banking where Operators might not have thought to be possible.

### AML/CFT & MLRO SERVICES

AML, KYC, Crypto Policy Writing, Review  
AML/CFT Compliance and Training  
PEP Manuals  
EDD and Monitoring Manuals  
Implementing Procedures and Support  
Business Risk Assessment (BRA)

Customer Risk Assessment (CRA)  
Case Review Assistance  
Transaction Monitoring Assistance  
MLRO Performance Review  
Identification and Verification Services

### COMPLIANCE & LEGAL SERVICES

Decades of direct industry experience with a history of advising governments and regulators including writing laws and legislation.

Regulatory Compliance Advisory Services  
Drafting of Policies, Procedures  
Agreements and T&Cs  
Commercial Negotiations  
Mergers and Acquisitions  
Dispute Resolution  
GDPR Compliance

### CORPORATE SERVICES

Complex Corporate Structuring Advice  
Company Formation  
Company Administration  
Directorship and Secretarial Services

Accountancy and Book-keeping Services  
VAT Services  
Taxation Services  
Trustee Services

### TECHNOLOGY SERVICES

Dedicated Servers, Lease & Co-Location Service  
Private & Hyperscale Cloud Services, Hybrid Cloud  
Solutions  
Private Services - Proxy, VPN, BGP  
Data Compliance, Storage & Reporting

DNS, Global Traffic Director, Geo Load Balancing  
IP Transit  
Virtual Number Services  
AI Enabled Contact Centre (Including Chat Bots)  
SSL & Code Sign Certificates

#### London Office

13 Charles II Street  
London  
SW1Y 4QU

T: +44 204 548 3040  
E: info@dlagglobal.com

#### Isle of Man Office

2nd Floor, Hillary House  
Prospect Hill  
Douglas  
IM1 1EQ

T: +44 1624 604550  
E: info@dlagglobal.com