INSTITUTE
FOR GAMBLING
REGULATION

Minutes of the first Workshop on the Reporting Decree held on 25th February 2019

Topics:

1) General information
2) Provision of the automated output
3) Registration of communication parameters
4) Web, application for operators
5) Helpdesk
6) Testing environment, the so-called playground
7) Reference client

Present: Martin Šabo and Petra Nespěšná from **Ministry of Finance**, Jan Jiroušek from State Treasury Centre of Shared Services, Luděk Rašek from **CGI**

Timetable presented by MoF:

	Published/Expected deadline
Part of the technical materials and part of the reference client	Published on 22nd February 2019
The rest of the technical materials and the reference client	During March
HELPDESK on the CA website	4th March 2019
Testing environment	
• Publishing of access addresses and communication parameters	1st March 2019
• Registration of communication parameters	4th March 2019
• Download of registered sets of packages	by 11th March 2019
• Database checks	from mid-April
Registration form pursuant to Section 2 of the Reporting Decree	probably with the launch of the testing environment
Model for daily game reporting	March 2019
Registration process	1st April – 2nd May 2019
Methodology	the first part in March 2019, other parts one by one
FAQ	continuously

Ad 1) General Information – speaker Martin Šabo

- The MoF started the Workshop by stating that, due to the response of the gaming market operators, the effectiveness of the Reporting Decree was postponed to 1st June 2019. The

latest date for the registration of gambling operators (data exchange for technical security of connection between CA and operator) was also confirmed, that is **2nd May 2019. See above the summarizing timetable of publication of supporting documents, models and the testing environment.**

- In addition, basic information on the content of the Reporting Decree was provided. The Decree regulates the so-called big and small model:

    - The big model is a remote access, where it is a single automated output containing multiple data packages for each type of a gambling game (lottery, fixed-odds betting, totalizator game, technical game, all of them also operated as an internet game and then an internet live game, and internet bingo).

    - The small model is a daily game reporting (land-based live game) and a daily game record (land-based bingo), where a data package will be provided for each casino and always cumulatively within 10 days after the end of a calendar month.

- **The MoF stated that all game and financial data will be collected by the Customs Administration of the Czech Republic** (hereinafter referred to as the "CA"), including data from the Internet operation.

- The MoF is preparing the translation of **the Reporting Decree into the English language.** At the same time, however, they pointed out that the only legally binding version is the one in the Czech language. The translation of the Reporting Decree made by the European Commission in the notification process is not entirely correct, because it contains terminological inaccuracies, and the MoF does not recommend proceeding in the implementation according to this version of the Decree.

Ad 2) Provision of the Automated Output - speaker Jan Jiroušek

- STCSS started with introduction of the commonly used terms of the Reporting Decree (see the published presentation) and stated that it is an important information system. We consider this information to be significant considering the addressed issue of compatibility of the Decree with GDPR, where the importance of the system is one of the criteria binding people to conduct the Assessment of Impact of Personal Data Protection.

- STCSS stated that all data necessary to technically secure the connection between an operator and the CA, as described in Section 2 of the Reporting Decree, are collectively called **communication parameters**.

- **Operator's communication parameters**

    - URL for package download - web server of the operator
    - URL for notification of operating packages, if they are formally correct - will be marked "OK"
    - URL for notification of operating packages, if they are formally incorrect - will be marked "ERR"

        - These addresses can be the same. This is the operator's choice.
    - Certificate of the Recognized Electronic Seal
        - CA will use higher security, that is the qualified electronic seal.
        - Three authorized persons were stated, namely First Central Authority, Post Signum and E-Identity. These persons are accredited for issuing these seals. However, an operator may use their own (internal one).
    - The encryption package is divided into
        - encryption of the CA to an operator - TLS certificate of web server
        - encryption of an operator to the CA - TLS authentication
    - **STCSS stated that the communication parameters may be different for each type of gambling game,** but this is an operator's choice.
    - Data transfer is a form of electronic submission under the Code of Administrative Procedure.

- **Communication parameters of the Customs Administration**

    - URL for downloading confirmation packages
    - Certificate of the Qualified Electronic Seal - Higher security protection than required from operators
    - CA uses safety components that comply with the Cyber Security Act
    - **The change of the communication parameters of the CA** side will be reported to operators in an official letter and published on the MoF website.

- STCSS described how the automated output will be provided. An operator will issue a data package at its URL, that si for 7 days. The CA must download the package within this time period and then issue a confirmation package at the URL of the operator.[1] If the operator receives a package marked "ERR", which is formally incorrect, then they must issue a new package with the higher number of the version within 2 business days. **Only the first corrected package can be considered formally correct and thus the fulfilment of the legal obligation under the Decree**. Further correction may already be considered a violation of the Decree.

- **STCSS described the individual types of data package checks** that will be performed by the CA (see more in the published presentation). It also introduced the contents of the confirmation package, where, in addition to any formal or material errors, there will be the so-called Warnings (a recommended error but consistent with the Decree that can also be contained in the package marked "OK") and the so-called Proceedings (a file with process errors that is not machine-readable, but will be read by "people").

- Moreover, the process of **correcting material errors** (corrections in errors of data provided) was also described. Operators will submit these corrections in the form of a **submission in accordance with the Code of Administrative Procedure via the CA form**. The check of such submissions will not be automated.
    - The CA will assess, which kind of errors it is, how often these corrections of material errors are submitted by an operator and for what reason.

[1] It is not specified, in which time period the CA must send this confirmation package. IFGR will ask MoF.

- If a correction of material errors caused an inaccuracy of previous packages provided, the CA may reject it. However, an operator can issue all the packages again, including the ones previously provided, which would be affected by the identified errors, and assign them new numbers.

Ad 3) Registration of communication parameters (from 1st April until 2nd May 2019)

- The registration will take place in the form of an electronic submission in accordance with the Code of Administrative Procedure via the CA form**. The jurisdiction will be determined to the regional customs office according to the address of an operator**. If the operator has its registered office abroad, the Customs Office of Prague will be the relevant office.

- **STCSS emphasized that each data package provided must be registered,** with the stated having impact on:

  - **New Basic Licence** - 30 days before the start of gambling operation
  - **Change of Licence** - 5 days before the change of communication parameters, which means before the start of operation, e.g. of a new way of gambling operation or of a new gaming establishment

- **The registration form will have three types**, that is for a completely new reporting of communication parameters, for their change or for cancellation of the entire package set (e.g. cancellation of a gaming establishment). The form will contain:
  - Identification of an operator - for Czech companies, additional information will be added after entering the company number, foreign companies will have to enter the data manually and state their own number of the tax payer
  - Identification of a signing person - the possibility of entering power of attorney (inserted once, afterwards a link is enough)
  - Listing of Certificates - binary form (file) or a text
  - Filling in since which day it is provided
  - The form will **allow to save the filled-in data in a data copy** in an xml file, which can then be reloaded when using the form.
  - **Sending the form** will be possible either after entering the login data into a data box directly by the data box, or via e-filling office of the CA with an electronic signature

Ad 4) Web application for operators

- STCSS introduced an established web-based help application for operators that enables operators to **track the status of individual packages**, that is of those already provided when they are waiting for their confirmation, their status or which of them have the provision period. It will also allow manual downloading of confirmation packages.

- It will be operated at the same URL as confirmation packages will be.

Ad 5) Helpdesk

- It is a service operated by the CA for the technical and methodical support of gambling operators.

- **Launch on 4th March 2019**

- It will contain application Helpline, where an operator can create their profile and track the status of their queries and requirements
  https://www.celnisprava.cz/cz/aplikace/Stranky/helpline.aspx

- **Contacts**
  - hazard@cs.mfcr.cz
  - During working hours: 7:00 – 15:30, on the phone - +420 261 331 997

Ad 6) Testing environment, the so-called playground

- **STCSS** introduced the planned testing environment, where operators will be able to test the readiness of their internal systems for the obligations under the Reporting Decree. They outlined the areas (see the published presentation) that operators will be able to test saying that **if operators need to test some other area during the testing, they should send the proposal to the MoF.** Based on an audience query, it was stated that it would also be possible to test error packages that could be generated in the testing environment. MoF promised to define the minimum requirements of the data package only for the testing environment.

- They also stated that the testing environment **would be in operation even after the Reporting Decree comes into force**, 7 days a week 24 hours a day.

- **The testing environment will be operated on a special website that will be published.**

- STCSS recommended that, regarding safety, operators **use other communication parameters** than they will use later in the real environment. CA will use other communication parameters.

- STCSS Pointed out that **operators need to use qualified certificates for the recognized electronic seal** already in the testing environment. Based on an audience inquiry, it was stated that authorized companies issuing the seals can issue a testing seal. However, this is not a recognized electronic seal.
  - CA will only use the recognized seals because the qualified seals are verified against the EU's "trust list" and will therefore not be used in the testing environment.

- Data in the testing environment will always be deleted during the weekend except for registered packages.

- **Any errors** detected during the testing should be reported by operators via the helpdesk or

the reference client application.

- **Support of the testing environment will be possible from 8:00 to 18:00 during working hours.**

Ad 7) Reference client application – speaker Luděk Rašek

- It is an application that will include **technical tools to facilitate the implementation of the Reporting Decree**, especially the creation of data packages and its requirements.

- The application will allow to formally check the accuracy of a data package – encryption and signing requirements, whether all package fields are filled in etc.

- **Defined tools are final for now.**