

Payment blocking

THE NATIONAL POLICE BOARD'S INSTRUCTIONS AND GUIDELINES

UPDATE TO THE GUIDELINES SIGNED ON 24 OCTOBER 2022

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1 Background

The primary purpose of this document is to present the National Police Board's views of provisions on payment blocks. This document is mainly intended for providers of payment services and virtual currencies. The guidelines have been updated after the payment blocks entered into force. The updates relate to the entry into force of payment blocks, errors in the payment authorisation system, and joint accounts.

Payment blocks were added to the Lotteries Act at the beginning of 2022, and they will enter into force at the beginning of 2023. Provisions on payment blocks are laid down in section 62 I of the Lotteries Act, and their goal is to affect the provision of gambling services in Mainland Finland, which is a key area in the prevention of gambling problems. Problems can be prevented effectively by affecting the gambling services provided, and their availability and accessibility. Because the properties of gambling operators outside the system of exclusive rights, the terms and conditions of gambling, and the range of gambling services cannot be regulated in the Lotteries Act, the aim is to prevent gambling problems by restricting their accessibility.

The goal of the regulation on payment blocks is to restrict the accessibility of gambling services outside the scope of application of the Lotteries Act, insofar as their provision is marketed in violation of the Lotteries Act. The regulation focuses on payments for gambling services between players and gambling operators. Therefore, the aim is not to intervene in payments between gambling operators or other payments between gambling operators and natural persons, including the payment of wages. Furthermore, payment service providers cannot prevent payments of gambling operators added to the list of payment blocks in the Åland Islands.

In a Government Proposal¹, the introduction of payment blocks was justified by measures aimed to prevent problems remaining ineffective in the system of exclusive rights if measures are not taken to restrict the provision of services outside the system. As fully exhaustive restrictions cannot be implemented, it is necessary to take measures that are feasible and that, when combined, help restrict availability and accessibility. In the Government Proposal, the payment blocks were considered to be acceptable by EU law, considering that they would help guarantee the achievement of the goals of the system of exclusive rights, and they would not exceed the level required to achieve the goals.

The payment blocks were considered appropriate means to restrict the availability and accessibility of gambling services. The specific goal of the payment blocks is to prevent gambling problems. With regard to preventive and corrective measures, studies show that focus should be placed on prevention. The payment blocks are expected to restrict availability and reduce the marketing of gambling services which is considered to be consistent relative to the goals set for the system of exclusive rights. The blocks will be targeted at such gambling operators that significantly target their marketing at consumers in Mainland Finland. This type of targeted marketing shows a straightforward aim to evade the Finnish system of exclusive rights.

With regard to the payment blocks, the dimension of fundamental rights and EU law were also assessed. The payment blocks may have a negative impact on the right to earn one's livelihood by the employment, occupation or commercial activity of one's choice as laid down in the Constitution of Finland, insofar as gambling concerns the services of gambling operators added to the list of payment blocks.

The EU law on payment services allows the Member States to impose prohibitions to initiate and complete payment transactions in their national law. The goal of Payment Services Directive 2 (PSD2) is to open up competition on the payment service market by such means as allowing customers to use their bank accounts through applications and services provided by new payment service providers. The proposed regulation on payment blocks is not considered to be in conflict with this goal. The obligations of payment service providers are also clearly defined in the Lotteries Act. In addition, according to the European Commission's report published in 2019, payment blocks are used in seven other EU/EEA states to protect vital interests.

The transfer of payment services outside the EU or EEA may affect the risk of money laundering, but in the view of the Financial Intelligence Unit of the National Bureau of Investigation, the significance of risks is difficult to estimate beforehand. Based on a preliminary estimate presented in the Government Proposal, there would not be any significant transfer outside the EU or EEA.

The impact of the payment blocks depends on how effectively they or other similar blocks can be implemented. The sufficient effectiveness of the technical implementation and the coverage of the measures must be ensured in the practical implementation of the blocks. On the other hand, a lighter model will also prevent gambling problems, because the blocks raise the threshold to use the gambling services of gambling operators outside the system of exclusive rights, and they may also reduce the range of services that are in violation of the Lotteries Act. A possible withdrawal of gambling operators outside the system of exclusive rights from the market

would reduce not only access to gambling services, but also the marketing of gambling services in violation of the Lotteries Act.

The ability to evade the blocks and the ease of such measures have an impact on the effectiveness of the blocks. However, it should be assumed that only part of players would evade the blocks in practice. How consumers are informed of the adoption of the blocks will also have an impact on the behaviour of different groups of players. On the one hand, the blocks will spread awareness that they are targeted at gambling services that are not regulated by the Lotteries Act or, furthermore, supervised by the National police Board, which supervises the gambling services of Veikkaus Oy.

On the other hand, the payment blocks will probably have a more significant impact on preventing harm than on reducing it, as they are expected to affect occasional and moderate players more strongly. Instead, the impact on frequent, high-risk and problem players will be lower.

The payment blocks can be considered to have a general preventive impact on the marketing of gambling services in violation of the Lotteries Act. The regulation on payment blocks may reduce the willingness of gambling operators outside the system of exclusive rights to target marketing at players in Mainland Finland, as the blocks will be targeted at the gambling operators, which the National Police Board has stated in its decisions on prohibitions to market gambling services in violation of the Lotteries Act.

2 Relevant provisions on payment blocks

2.1 Lotteries Act (1047/2001)

Section 2 – Definition of a lottery, subsection 1

In this Act, a lottery means an activity in which participants may win a prize of monetary value based in full or in part on chance and in which there is a charge for participation. Postal or local or long-distance telephone costs or similar costs incurred by participants in registering their participation in a lottery which do not benefit the lottery operator are not considered to be a charge.

Section 2 – Definition of a lottery, subsection 3

The provisions of this Act concerning lotteries also apply to
1) lotteries which are run abroad, to the extent that their tickets are sold or supplied in Finland; and

2) lotteries which are run in the province of Åland, to the extent that their tickets are also sold or supplied elsewhere in Finland.

Section 3 – Definitions of gambling and the different forms of providing gambling services, subsection 1

In this Act, gambling means a lottery in which players can win money.

Section 62 – Prohibitions on running a lottery, section 2, paragraph 1

It is prohibited to:

1) sell or supply tickets for a lottery run without a licence required under this Act, or any other gambling services than those provided by Veikkaus Oy, or market such a lottery.

Section 62 a – Prohibitions on providing gambling services

The National Police Board may prohibit the provision of gambling services if:

- 1) gambling services are provided by a body other than Veikkaus Oy;
- 2) the provision of gambling services violates the prohibitions laid down in section 62, subsections 1–4; or
- 3) this Act, or a decree issued under this Act, is otherwise violated in the provision of gambling services in a manner other than that referred to in section 62 b.

The prohibitions may be imposed on:

- 1) the gambling operator;
- 2) a trader or organisation that supplies participation tickets and fees, provides space for making slot machines or specialty gaming machines available for use, or markets gambling; or
- 3) a natural person who markets gambling services or otherwise advances participation in gambling services for financial or other gain.

A prohibition is in effect for a maximum of 12 months. The National Police Board may extend the prohibition period by no more than 12 months at a time if the way of providing the gambling services has not been corrected.

Section 62 c – Conditional fine

The National Police Board may impose a conditional fine to reinforce the prohibition referred to in section 62 a, 62 b or 62 m.

The National Police Board orders the payment of conditional fines imposed to reinforce the prohibition referred to in section 62 a and 62 m. The Market

Court orders the payment of conditional fines imposed to reinforce the prohibition referred to in section 62 b upon application of the National Police Board.

Provisions on conditional fines are laid down in the Act on Conditional Fines (1113/1990).

Section 62 l – Prohibition on initiating and completing a payment transaction

The National Police Board must maintain a computer-readable list in a public data network of such gambling operators that market gambling services in violation of section 62, subsection 2, paragraph 1 and whose provision of gambling services the National Police Board has prohibited based on section 62 a.

A payment service provider cannot carry out or initiate a payment transaction concerning gambling if the payer is a natural person acting as a player and the payment recipient is a gambling operator as referred to in subsection 1.

The content of subsection 2 also applies to virtual currency services provided by virtual currency providers and the use of virtual currency as a medium of exchange.

Section 62 m – Prohibiting the initiation and completion of payment transactions

The National Police Board may prohibit the initiation and completion of payment transactions related to gambling if the payment service or virtual currency provider is in violation of the prohibition laid down in section 62 l.

The prohibition may be imposed on the payment service or virtual currency provider.

The prohibition is in effect for a maximum of 12 months. The National Police Board may extend the prohibition period by no more than 12 months at a time if the process of initiating and completing the payment transaction has not been corrected.

Section 62 n – Obtaining information from payment service providers

The National Police Board shall have the right, free of charge and without being prevented by confidentiality provisions, to obtain information from the payment service or virtual currency provider about gambling operators acting as payers or payment recipients and about service providers that initiate or complete payment transactions on their behalf.

The right to obtain information applies to the following information, provided that it is available in the service providers' systems:

- 1) account number;
- 2) merchant category code;
- 3) identification information about the gambling operator or the service provider that transmits payments for it;
- 4) the number of payment transactions; and
- 5) information other than that referred to in paragraphs 1–4 required to supervise the prohibition to initiate and complete payment transactions.

However, the National Police Board will not have the right to obtain personal data related to individual payment transactions.

2.2 Payment services act (290/2010)

Section 41 – The service provider's obligation to carry out a payment assignment

The service provider can only refuse to carry out a payment assignment if the conditions agreed for carrying out the payment assignment in the framework agreement are not met or if otherwise defined later in this act.

2.3 Act on virtual currency providers (527/2019)

Section 2 – Definitions

In this act:

- 1) "virtual currency" means a value available in digital format:
 - a) which a central bank or other authority has not issued and which is not a legal payment instrument;
 - b) which individuals can use as a payment instrument; and
 - c) which can be transferred, deposited and exchanged in electronic format;
- 2) "virtual currency provider" means a virtual currency issuer, virtual currency exchange service and its marketplace, and a wallet service provider;
- 3) "virtual currency issuer" means a natural or legal person who issues a virtual currency;
- 4) "virtual currency exchange service" means a natural or legal person who, as a business or professional activity:
 - a) exchanges a virtual currency into a legal payment instrument or other virtual currency as a service;
 - b) exchanges a virtual currency into another commodity or a virtual currency for another commodity as a service; or

- c) maintains a marketplace in which its customers can carry out the activities referred to in paragraphs a and b;
- 5) “wallet service provider” means a natural or legal person who keeps a virtual currency in its possession on behalf of another party or provides the transfer or custody of a virtual currency;
- 6) “service related to a virtual currency” means the issuance of a virtual currency, a virtual currency exchange service or the provision of a wallet service.

Electronic money referred to in section 5, subsection 6a of the Act on Payment Institutions (297/2010) is not regarded as a virtual currency as laid down in subsection 1, paragraph 1 above.

3 List of payment blocks

According to section 62 I of the Lotteries Act, the National Police Board must maintain a list of such gambling operators that market gambling services in violation of section 62, subsection 2, paragraph 1 and whose provision of gambling services the National Police Board has prohibited based on section 62 a. Payment service and virtual currency providers are obligated to block payments targeted at companies added to this list, in which the payer is a natural person in the role of a player. Therefore, payment service providers are responsible for blocking payments related to gambling services from players to such gambling operators that have been added to the list of payment blocks.

If a gambling operator outside the system of exclusive rights markets its gambling services in violation of a valid prohibition laid down in the Lotteries Act, the authorities may issue an appealable decision on a prohibition. After a prohibition decision enters into force, the gambling operator subject to the prohibition is added to the list of payment blocks, after which banks and other payment service providers must block the operator’s payments related to gambling. The prohibition can be extended by 12 months at a time if the activities in violation of the Lotteries Act continue.

3.1 Content of the list

The content of the list of payment blocks has been discussed extensively with payment service providers, payment agents and virtual currency providers. Based on these discussions, the data content has been agreed to consist of the name, business ID or other registration number of the gambling operator or brand, brand names with alternative versions, the

account number, merchant ID, merchant category code, blockchain address, and the start and end dates of the decision on a prohibition.

Name	Registration number	Account number	Merchant id	MCC	Blockchain address	Start date (Y/M/D)	End date (Y/M/D)
Company X	XXXXXX	XXXX	XXX	7995	XXXXXX	XXXXXXXX	XXXXXXXX
Company Z	XXXXXX	XXXX	XXX	7995	XXXXXX	XXXXXXXX	XXXXXXXX

CSV table in Excel format

Name;Registration number;Account number;Merchant id;MCC;Blockchain address;Start date (Y/M/D);End date (Y/M/D)
Company X;XXXXXX;XXXX;XXX;7995;XXXXXX;XXXXXXXX;XXXXXXXX
Company Z;XXXXXX;XXXX;XXX;7995;XXXXXX;XXXXXXXX;XXXXXXXX

CSV table in text format

Because of the properties of the CSV table and the entry of data in the system, it is important that the data content is identical at all times. The position or quantity of the fields must not be changed without notifying the supervised operators, and any changes should be avoided in such situations as well, if possible. The CSV table follows a European standard, in which rows are separated by a line change and cells are separated by a semicolon. Spaces can only be used if they are part of the name of an operator or its brand.

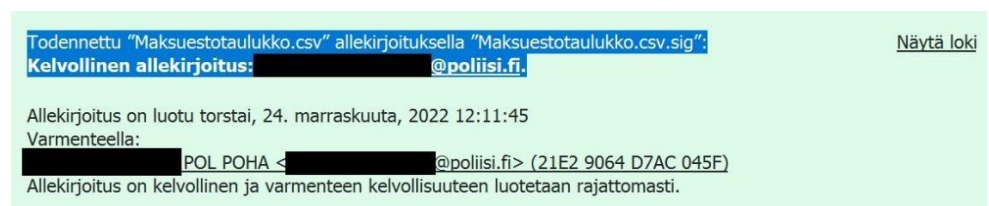
As a rule, the content of the list will consist of the name of a company, business ID, brand names, MCC and the duration of the prohibition, because the National Police Board does not normally have access to other information. If the account number, merchant ID or blockchain address of a listed gambling operator is known, it will be added to the list immediately, and a notification of the change will be issued as defined above.

3.2 Publication and protection of the list of payment blocks

When a gambling operator is added to the list or removed from it, the National Police Board’s Gambling Administration will publish an updated list at <https://poliisi.fi/en/blocking-payment-transactions>. The list of payment

blocks will also be sent by secure email to all payment service and virtual currency providers whose email address is known by the National Police Board. The updated list of payment blocks will be sent to known payment service providers by secure email. Information about payment service and virtual currency providers has been obtained from the Finnish Financial Supervisory Authority's register and Finance Finland. However, each payment service provider is responsible for ensuring that payment blocks are implemented in accordance with the updated list of payment blocks. The list of payment blocks will be updated as a website and a CSV table, which can be downloaded from the website. An electronic newsletter regarding payment blocks will also be published, and it can be subscribed to at <https://poliisi.fi/en/blocking-payment-transactions>.

An official of the National Police Board will sign the list of payment blocks in digital format. The digital signature will be verified using a SIG file in compliance with the OpenPGP standard. A cryptographic SHA-256 hash will also be published alongside the list, and it can be used as a checksum to verify the integrity of the list. The SHA-256 hash is a character string, which changes if the content of the file is changed. A change of a single character may change the SHA-256 hash from d3ed8e2132b667e24eeb252bf743067418559f94a32315ec800d0e1f352169f8 to a23b9cb3e75b814e15e5f3d6373eb49f2b97b2b129f5ec4ec45ef7e2612a01dc.



An example of verifying the digital signature

4 Implementing payment blocks

Based on section 62 l of the Lotteries Act, payment service and virtual currency providers are responsible for the practical implementation of payment blocks. Prohibitions are unconditional and apply to all forms of completing and transmitting payment transactions related to gambling, including account transfers, payment cards and other payment instruments. Prohibitions apply to all providers of gambling services in Mainland Finland, regardless of whether they are established in Finland or abroad. Based on section 62 m of the Lotteries Act, the National Police Board may prohibit an operator that has violated a payment block to initiate and complete

payment transactions related to gambling, and impose a conditional fine to reinforce the prohibition.

However, these are new legal provisions, the implementation and supervision of which have not yet been fully defined. During the discussions between payment service providers, payment agents and virtual currency providers, it was stated that, in implementing payment blocks, the parties can rely on the list of payment blocks provided by the National Police Board, and payment blocks implemented based on the list are sufficient. The National Police Board does not require the list of payment blocks to be supplemented independently. As a result, it should be expected that some payments will be completed despite any blocks at the first stage, because the information included in the list is insufficient to block all prohibited payments.

Several parties have pointed out that, depending on the payment method, the gambling operator's account number, merchant ID or blockchain address should be known to establish effective payment blocks. Simply put, the account number serves to reliably identify the payment recipient in SEPA payments (i.e. account transfers), the merchant ID acts as the payment recipient's identifier in card payments, and the blockchain address is the payment recipient's identifier in virtual currency payments. However, as the National Police Board does not normally have access to this information, the blocks must be based on available information, including a gambling operator's name and brand names.

The list of payment blocks will also include the business ID, but it is understood that this can only be used in payment blocks when a gambling operator is the customer of a payment service or virtual currency provider. The primary advantage of the business ID is that it helps concerned citizens more reliably identify companies that have been added to the list of payment blocks and avoid their gambling services.

With regard to other information included in the list of payment blocks, the MCC used in card payments is insufficient on its own to target payment blocks. Based on the combination of MCC 7995 and the name of a gambling operator or its brand, payments must, however, be blocked because MCC 7995 is only used in gambling. As a result, the MCC can be used in the supervision of card payments to identify any payments related to gambling. Some gambling operators may also use other MCCs due to their broad range of activities. In this case, it may not be possible to block payments based on the MCC.

4.1 Responsibilities of payment service and virtual currency providers

Payment service and virtual currency providers are obligated to block payments targeted at companies added to the list of payment blocks, in which the payer is a natural person in the role of a player. The targeting of blocks is based on information included in the list of payment blocks provided by the National Police Board. When a payment service provider blocks a payment transaction, the payment must be returned to the issuer of the payment assignment, i.e. the player. With regard to card payments, the payment verification can be rejected.

Generally, the National Police Board does not regard it a violation of the payment block system if a credit card payment or other payment verification system does not respond quickly enough and it results in a payment to be completed. However, if the issues with the verification system are frequent, administrative measures may be undertaken.

Payment blocks can only be in effect for the duration of the relevant decision on a prohibition. The National Police Board requires that the information included in the list of payment blocks is entered in the system within five working days after its publication. Administrative measures may also be undertaken due to repeated delays in compliance with the payment block list. The list will be updated when a gambling operator is removed from it but, due to possible delays, payment service and virtual currency providers must independently ensure that payment blocks targeted at such gambling operators are removed promptly. To this end, the list indicates the duration of decisions on prohibitions.

Payment service and virtual currency providers must provide the National Police Board with the payment information it has requested if it is necessary to supervise the prohibition to initiate and complete payment transactions. The right to obtain information does not apply to personal data.

Payment service and virtual currency providers are responsible for their activities, and they will not be held responsible for payments whose recipient is unknown. As a result, a player's payment service provider cannot be obligated to block a payment transferred from a player to a gambling operator via a payment agent if the payment service provider cannot know the final payment recipient. In this case, the payment block should be implemented by the payment agent who knows who the payment recipient is.

5 Special questions related to payment blocks

The implementation of payment blocks involves various challenges, the most significant of which are the availability of the information required and the targeting of the blocks so that they do not block any other payments. The most common problems and their possible solutions are presented below.

5.1 Name-based payment blocks

The implementation of payment blocks by name will be the most common practice based on the available information. When using a name, it must be considered that the name is not a completely reliable method of identification in SEPA payments, in particular, as the payer can enter any character string as the payment recipient's name in account transfers, without the name having to be linked to the actual payment recipient in any way. Nevertheless, it should be expected that, in practice, all payments in which the recipient is a gambling operator or its brand are payments targeted at them. Brands of gambling operators whose names are regular or commonly used names or contain such names can be an exception to this rule. This will be taken into account in the list of payment blocks published by the National Police Board, and no character strings that involve a significant risk of erroneous payment blocks will be added to the list. In card payments, the name should be a more reliable method of identification because it is obtained from the payment recipient, not the payer.

5.2 The player's location

The player's location also presents challenges in the implementation of payment blocks. As stated in Government Proposal 135/2021, the Lotteries Act only applies to Mainland Finland, which is why the regulation on payment blocks only applies to outgoing payments from Mainland Finland. This requires that each player's postal code is verified regarding payment transactions. If the address matching a player's postal code is located in the Åland Islands or abroad, the payment transaction must not be blocked. At <https://poliisi.fi/en/blocking-payment-transactions>, the National Police Board will publish a list of postal codes in which players' payments can be blocked. The list is also attached to this document.

However, the postal code does not indicate the player's physical location. As a result, it may be possible that, due to the technical implementation of payment blocks, payments are blocked between a gambling operator added to the list of payment blocks and a player whose address is in

Mainland Finland, even though the player is staying outside Mainland Finland because of travel or a temporary residence period abroad.

In practice, it is technically possible to separate card-based payment transactions in which the card is physically present from those in which the card is not present. Therefore, the regional application of the Lotteries Act can be addressed, in addition to identifying the postal code, by not blocking any payment transactions between a gambling operator added to the list of payment blocks and a player in which the player's card is present, for example. This way, it would be possible to prevent situations where the use of gambling services outside Mainland Finland was blocked due to the player's postal code being in Mainland Finland.

5.3 Jointly used accounts

In addition to temporary periods of stay abroad, jointly used accounts can cause erroneous payment blocks. Payment service providers have customers with joint accounts. In this case, the account is in the name of a person, with another person only having the right to use the account. Joint accounts can cause a situation where only some of the persons who use a single account have an address in Mainland Finland. However, the premise of the payment blocks is that the origin of a payment is determined based on the postal code of the account's primary holder. As a result, payments made from jointly used accounts to gambling operators added to the list of payment blocks must be blocked, even if not all account users are actually located in Mainland Finland, provided that the account holder's postal code is in Mainland Finland. If a payment service provider can reliably identify the users of a joint account, only payments from users residing in Mainland Finland must be blocked.

5.4 Section 41 of the payment services act

According to section 41 of the payment services act, the service provider can only refuse to carry out a payment assignment if the conditions agreed for carrying out the payment assignment in the framework agreement are not met or if otherwise is defined later in this act. According to the justification of the provision (Government Proposal 169/2009), the section exhaustively defines the grounds based on which service providers can refuse to carry out a payment assignment. With regard to other provisions, the justification refers to section 26 of the Act on Detecting and Preventing Money Laundering and Terrorist Financing (503/2008), valid at the time of the act's entry into force, which lays down provisions on the obligation of service providers and other parties with a reporting obligation to suspend a business activity or refrain from it. The provisions of the Lotteries Act cover

the grounds to refuse to carry out payment transactions as referred to in section 41 of the payment services act and as laid down in other legal provisions. The EU law on payment services also allows the Member States to impose prohibitions to initiate and complete payment transactions in their national law.

5.5 Virtual currencies

The provisions of the Lotteries Act on payment blocks mention virtual currency providers separately, and the provisions also apply to them. However, virtual currencies are not actual money, as is also stated in the act on virtual currency providers (572/2019). As a result, the interpretation whether games played solely using virtual currencies are gambling services is unclear. According to the Lotteries Act, gambling means a lottery in which players can win money. Therefore, games in which players can win virtual currencies are not gambling services by definition and, therefore, not subject to payment blocks. However, games based on virtual currencies are rare, and most gambling operators that accept virtual currencies exchange virtual currencies into money before the use of gambling services, and money back into virtual currencies after the use of gambling services or when paying winnings. These types of gambling services are subject to the regulation on payment blocks.

Payment blocks implemented by virtual currency providers will be challenging. Some virtual currency providers exchange virtual currency into money and back, while some only accept virtual currencies without processing any money transfers. If virtual currencies are exchanged into money, the money will be transferred to the owner of the virtual currency account.

The reliable blocking of payments using virtual currencies would require the addition of blockchain addresses to the list of payment blocks. Blockchain addresses help to reliably identify the payment recipient. However, this information is not usually available when creating the list of payment blocks. The blockchain address can also be changed which reduces the effectiveness of the blocks. The development of the Markets in Crypto-Assets (MiCA) regulation is in progress in the EU. If entered into force, it will facilitate supervision in the future, as it will include significantly stricter provisions on knowing the customer, for example, and also a requirement for naming the payment recipient when making a payment.

6 Supervision of payment service and virtual currency providers, and the right to obtain information

The National Police Board supervises payment service and virtual currency providers by using its right to obtain information as laid down in section 62 n of the Lotteries Act. The National Police Board will request the information laid down in section 62 n from various providers to assess whether a provider has fulfilled the obligations set out in the Lotteries Act and blocked payments from players to gambling operators added to the list of payment blocks. If a prohibition is violated, the National Police Board may impose a prohibition to initiate and complete payment transactions related to gambling and a conditional fine to enforce the prohibition on a payment service or virtual currency provider. The prohibition can be in effect for 12 months, and it can be extended by 12 months at a time if the activities have not been corrected. If a prohibition is violated based on intent or gross negligence, the National Police Board will impose the prohibition at its full extent. In other situations, the necessity or duration of a prohibition will be considered separately.

During the first stage of the system of payment blocks, it will be important to exercise the right to obtain information not only to supervise the system, but also to reinforce it, and the initial goal of supervision is not to impose prohibitions on payment service and virtual currency providers. It can be assumed that payment transactions that have been completed regardless of any blocks will be identified using the information obtained. Based on this information, the content of the list can be developed to better serve the goals of the Lotteries Act.

The right to obtain information can also be used to investigate payment paths related to gambling. The information obtained from payment service providers can be used to identify payment agents that accept payments from players and transmit them to gambling operators, for example. Chaining can take place through several payment agents. The gambling operator's account number can be obtained from the last payment agent in the chain. The information contained by the account number (BIC and SWIFT) helps identify the payment service provider used by the gambling operator. After this, the gambling operator's payment service provider can be requested to provide information about the account owner and other accounts owned by the gambling operator. Account numbers will be added to the list of payment blocks once account owners have been reliably verified.

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This document has been signed electronically. Police of Finland 20.4.2023 at 14:18. Authenticity of the signature can be verified by the Registry.