

SPECIFIC GAME ROOMS

Specific game rooms differ from gambling locations in that specific game rooms are exclusively or mainly intended for gambling (Lotteries Act, chapter 1, section 4, paragraph 6). If specific game room employees are employed and the room contrcontrolled by the gambling operator, risks may be lower, whereas higher stakes and winnings in certain gambling services and a broader range of gambling services may increase risks compared with gambling outlets. Risks are also increased by ticket vending and money exchange machines and the opportunity to withdraw cash in game rooms.

After mandatory player registration (section 14, subsection 1 of the Lotteries Act) was introduced, anonymous gambling no longer exists in practice, which reduced the money laundering risk of specific game rooms. However, it is still possible that a customer abuses another person's identification token. In this case there is a risk that the actual customer cannot be identified. This risk can be managed by comparing the customer's identification documents against the identification token used and the customer themselves, which will help ensuring that the actual customer is the customer whose identification details were used. In addition, the opportunity to use cash increases the risk associated with this distribution channel as well. The fact that customers can play and collect their winnings without any contact with employees may also increase the risks associated with this distribution channel. In specific game rooms, customers can claim winnings to a certain amount without identification regardless of whether the winnings are claimed via a machine or by contacting personnel. However, if the limit amount is exceeded, the customer's identity is verified before the winnings are paid regardless of whether the winnings are claimed via a machine or by contacting personnel, which in turn lowers the risk.

Specific game rooms also involve higher stakes and winnings than gambling outlets. However, the most significant risks are the same as those presented for gambling outlets in their appendix.

Considering the supervision of gambling, the aforementioned functions that increase risks in specific game rooms need to be addressed specifically. When selling gambling services, it is possible that the identity of a customer is not verified when the threshold value is exceeded and that any suspicious transactions are not identified or reported. However, player registration becoming mandatory has significantly reduced the number of verifications required to be made when the threshold value is exceeded and therefore reduced the overall risk. In specific game rooms, the aforementioned money laundering risks can be further reduced by supervising gambling and customers, both automatically and in real time. Here, 'automated supervision' means an alarm system connected to tickets and ticket vending machines, which helps to detect any suspicious transactions and unusual gambling. Automated supervision also includes CCTV systems in specific game rooms. 'Real-time supervision' means the continuous monitoring of customers by employees and the opportunity to react to alarms triggered by an alarm system in real time.

When defining the retention time of recorded material (such as video recordings), the ability to identify customers and transactions afterwards must be considered. Because the use of cash is a significant factor that increases the money laundering risk in specific game rooms, restrictions on the use of ticket vending and money exchange machines need to be considered. Restrictions may be time-based, so that tickets are only valid for a specific time, or quantity-based, so only sums falling below a specific limit can be claimed via machines. On the basis of risks, restrictions can also be imposed on other activities. For example, money exchange or cash withdrawals alone without any intention to play should not be possible. The aforementioned control measures can also be carried out in gambling outlets, where applicable.

Increasing customer identity verification and recording the use gambling services in customer information are strong risk control measures.

The ongoing legislative project aiming to make gambling activities subject to licence was not considered when this appendix to the risk assessment was created.