

Evaluation Report for:
Amarix B.V.
AMARIX-RNG
Version 1.0.0

Manufacturer: Amarix B.V.
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BMM Spain Testlabs s.l.u.

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EVALUATION REPORT

Client name & Address:	Amarix B.V. Schottegatweg Oost 10 Unit 1-9, Bon Bini Business Center, Curaçao
Client Reference Number:	Client Submission Letter Dated 30 th April 2024
Testing dates:	Start date: 30 th Mayo 2024 End date: 6 th June 2024
Product / Game Description:	AMARIX-RNG Version 1.0.0 SIGNATURES: See section 2.2
Test Category:	Category 0
Jurisdictions Recommended:	Bulgaria
Technical Standard used for Evaluation:	▪ Gambling Act 2012, by Decree No. 128, with amendments. ▪ Decree № 31 of 1 February 2021 on the adoption of an Ordinance on the general technical and functional requirements for gaming software and communication equipment for online betting and games by other electronic means of communication. ▪ Decree № 50 of 15 February 2021 on the adoption of an Ordinance on the terms and conditions for registration and identification of participants, the storage of data on organized online betting on the territory of the Republic of Bulgaria and the submission of information about gambling to a server of the National Agency for revenue ▪ Decree Nr.32 from 3rd February 2021 on the adoption of an Ordinance regarding the general mandatory gaming conditions and rules for the types of gambling for which licenses are issued
Location where test was performed:	BMM Spain Testlabs s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés Barcelona – España
Location where report was issued:	BMM Spain Testlabs s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés Barcelona – España
Conclusion:	PASS
BMM Reference Number:	RES-OL.1001
Method/Procedures used:	EURSAM-SPA-MO-41 v3.0
Consultant(s):	Alexander Guerra

1. SCOPE OF EVALUATION.

Amarix B.V. requested BMM Spain Testlabs s.l.u. to evaluate the random number generator AMARIX-RNG v1.0.0 for operation in the relevant below Bulgarian regulation:

- Gambling Act 2012, by Decree No. 128, with amendments.
- Decree № 31 of 1 February 2021 on the adoption of an Ordinance on the general technical and functional requirements for gaming software and communication equipment for online betting and games by other electronic means of communication.
- Decree № 50 of 15 February 2021 on the adoption of an Ordinance on the terms and conditions for registration and identification of participants, the storage of data on organized online betting on the territory of the Republic of Bulgaria and the submission of information about gambling to a server of the National Agency for revenue.
- Decree Nr.32 from 3rd February 2021 on the adoption of an Ordinance regarding the general mandatory gaming conditions and rules for the types of gambling for which licenses are issued.

2. EVALUATION CHARACTERISTICS.

2.1. PRODUCT DESCRIPTION

The software RNG in the system is the RNG service. It is hosted in a Kubernetes cluster on a virtual server in the data center. The RNG service is written in Java 17 and uses the org.apache.commons:commons-rng-simple:1.5 library from the Maven Central repository.

When the service is launched, 64 random bytes are read from the source /dev/urandom, which are used as seeds for the ISAAC algorithm. With each request for a random number, the RNG service returns 32 random bytes generated by the ISAAC algorithm. This number is used as a seed to the next steps.

Each game also has a salt string specified in the configuration. The obtained bytes undergo the hash function: hash sha256 in loops of 1000 iterations. The hash is combined with the clientSeed and nonce received from the player to obtain the random number. The result string is a 64-character hex string (256-bit) output to be used directly by the game logic to produce game outcomes.

2.2. EVALUATED SOFTWARE

Product: AMARIX-RNG v1.0.0					
File Name	Version	Location	Function	Digital Signature Type	Digital Signature
rng-sbai-certified.jar	1.0.0	server	RNG	SHA-1	98846A088426F85600EE32DEF1AB6A6AE90B3916
rng-sbai-certified-sources.jar	1.0.0	Source	RNG	SHA-1	8354EC44F14D0AC0FA1205F75B7A665A1D9F08A7

3. BMM EVALUATION PERFORMED.

3.1. SOURCE CODE REVIEW.

BMM examined the RNG source code and performed statistical tests on the output from the RNG. The relevant file(s) used are listed in the section 2.2.

3.1.1. SEEDING.

The ISAAC algorithm (seeded from the source `/dev/urandom`) produces a random seed.

3.1.2. CYCLING.

The algorithm is seeded each 1000 requested numbers.

3.1.3. SCALING.

The algorithm doesn't produce any scaling algorithm.

3.1.4. UNPREDICTABILITY.

The RNG uses sha256 to produce unpredictable outcomes.

3.2. STATISTICAL TESTING.

Statistical tests were performed on the output from the RNG. Raw output from the RNG was subjected to a range of tests in the Empirical, Diehard and NIST test suites.

Each test tests the hypothesis that the RNG is a random source of numbers. A "p-value" is produced for each test run, which is the probability that a truly random process would produce the same or a more extreme result. P-values are expected to be uniformly distributed between 0 and 1. The p-values for each test are evaluated using an Anderson-Darling test. This produces a single p-value, which is the probability that the individual p-values have been produced from a uniform distribution.

Finally, the p-values from each test in the same test suite are combined using the Holm-Bonferroni method to provide an overall p-value. This process adjusts each p-value to ensure that the overall probability of accepting the RNG as random matches the confidence interval used. The overall p-value, equal to the minimum of the adjusted p-values, is compared to a specific alpha value to determine if the RNG is accepted or rejected as being random for a specific confidence interval.

3.2.1. EMPIRICAL TESTS

The Empirical Tests are based on the tests described by Donald Knuth in *The Art of Computer Programming Volume 2: Seminumerical Algorithms* (1968, revised in 1997). They test sequences of numbers scaled to specific ranges.

Frequency Test	Counts of each number occurring across the sample set.
Serial Correlation Test	Counts of non-overlapping groups of numbers occurring together. Group sizes of two, three, and four are tested separately.
Runs Test	Counts of ascending and descending sequences of numbers. Note that this is a different test to the Runs Test in the Diehard and NIST Tests.
Gap Test	Counts of the size of gaps between successive occurrences of a given

	number. Each number in the range is tested separately.
Coupon Collector Test	Counts of sequence lengths required to complete a full set of each number in the range.
Subsequences Test	Similar to the Serial Correlation Test for pairs of numbers, except looking at numbers separated by a specific gap. Step sizes of 5, 10, 15, and 20 are tested separately.
Poker Test	The sequence is split into groups of five. The number of unique values in each group is counted.

Test	P-values	95% Confidence	99% Confidence
Frequency Test	1,000000	PASS	PASS
Serial Correlation Test	1,000000	PASS	PASS
Runs Test	1,000000	PASS	PASS
Gap Test	0,909765	PASS	PASS
Coupon Collector Test	1,000000	PASS	PASS
Subsequences Test	1,000000	PASS	PASS
Poker Test	1,000000	PASS	PASS
Overall	0,909765	PASS	PASS

Conclusion: The RNG is **ACCEPTED** as random at the 95% confidence interval.

Conclusion: The RNG is **ACCEPTED** as random at the 99% confidence interval.

3.2.2. DIEHARD TESTS

The Diehard Tests are based on the test suite published by George Marsaglia in 1995. They test sequences of raw binary output from the RNG.

Binary Rank 32x32 Test	Matrices are created using 32 32-bit words. The ranks of the resulting matrices are counted.
Binary Rank 6x8 Test	Same as the Binary Rank 32x32 Test, except each matrix is formed using 6 values, each taking 8 bits from successive 32-bit words with a specific offset. All possible offsets are tested separately.
Birthday Spacings Test	32-bit words are taken as values, sorted, and the spacings between them calculated. The number of spacings of the same size are counted.
Bitstream Test	Blocks of 2^{18} values are treated as a stream of overlapping 20-bit values. The number of possible 20-bit values that are not found in each block is counted.
Count The 1's Stream Test	8-bit values are taken and assigned a "letter" based on the number of one's appearing in the binary representation of each value. Overlapping groups of 5 "letters" are counted.
Count The 1's Specific Test	Similar to the Count The 1's Stream Test, except 8-bit values are taken from successive 32-bit words with a specific offset. All possible offsets are tested separately.
Runs Test	Counts sequences of increasing and decreasing 32-bit words.

	Note that this is a different test to the Runs Test in the Empirical and NIST Tests.
Squeeze Test	A value of 2^{31} is repeatedly multiplied by 32-bit words, dividing by 2^{32} and taking the ceiling of the result each time. The number of successive words that are required to reduce the value down to 1 is counted. The value is reset to 2^{31} and the process is repeated.

Test	P-values	95% Confidence	99% Confidence
Binary Rank 32x32 Test	1,000000	PASS	PASS
Binary Rank 6x8 Test	1,000000	PASS	PASS
Birthday Spacings Test	1,000000	PASS	PASS
Bitstream Test	1,000000	PASS	PASS
Count The 1's Stream Test	0,071261	PASS	PASS
Count The 1's Specific Test	1,000000	PASS	PASS
Runs Test	1,000000	PASS	PASS
Squeeze Test	1,000000	PASS	PASS
Overall	0,071261	PASS	PASS

Conclusion: The RNG is **ACCEPTED** as random at the 95% confidence interval.

Conclusion: The RNG is **ACCEPTED** as random at the 99% confidence interval.

3.2.3. NIST TESTS

The NIST Tests are based on the suite of tests released by the National Institute of Standards and Technology in Special Publication 800-22, Revision 1a (revised April 2010). They test sequences of raw binary output from the RNG.

Approximate Entropy Test	Similar to the Serial Test, count each possible m-bit value, except it does so for two adjacent m bit lengths and compares the two.
Block Frequency Test	Similar to the Frequency Test, except the data is split into equally sized blocks. The number of ones and zeroes in each block is counted.
Cumulative Sums Test	Random walks are created by converting the data to +1 / -1 for 1 / 0 respectively and summing consecutive values.
Discrete Fourier Transform Test	The data is transformed using a Discrete Fourier Transform. The number of peaks within the 95% threshold are counted.
Frequency Test	The number of ones and zeroes in the binary output is counted.
Linear Complexity Test	The length of the linear complexity of the random sequence is determined.
Longest Run of Ones Test	The data is split into equally sized blocks. The longest run of ones in each block is determined and counted.

Non-Overlapping Template Matchings Test	The data is split into equally sized blocks. Each block is searched for a specific pattern of bits and counted. A separate test is run for various bit patterns. Each bit pattern searched does not overlap with itself. That is, when the pattern is matched, the end of the pattern cannot be the start of another match.
Overlapping Template Matchings Test	Similar to the Non-Overlapping Template Matchings Test, except only one pattern is searched, which may overlap with itself.
Random Excursions Test	As with the Cumulative Sums Test, random walks are created by converting the data to +1 / -1 for 1 / 0 respectively and summing consecutive values. The number of times a given state is visited between returns to zero are counted. Separate tests are run for various states from -4 to +4, not including 0.
Random Excursions Variant Test	Similar to the Random Excursions Test, except the number of times the given state is visited is counted for the entire sequence. Separate tests are run for various states from -9 to +9, not including 0.
Rank Test	Matrices are created using 32 32-bit words. The ranks of the resulting matrices are counted. Note that this is fundamentally the same test as the Binary Rank 32x32 Test in the Diehard Tests, although the implementation may differ.
Runs Test	Runs of consecutive bits of the same value of various lengths are counted.
Serial Test	Counts of each possible m-bit values. Separate tests are run for various m bit lengths.
Universal Test	Distances between repeated patterns of bits are counted.

Test	P-values	95% Confidence	99% Confidence
Approximate Entropy Test	1,000000	PASS	PASS
Block Frequency Test	1,000000	PASS	PASS
Cumulative Sums Test	1,000000	PASS	PASS
Discrete Fourier Transform Test	1,000000	PASS	PASS
Frequency Test	1,000000	PASS	PASS
Linear Complexity Test	1,000000	PASS	PASS
Longest Run of Ones Test	1,000000	PASS	PASS
Non-Overlapping Template Matchings Test	1,000000	PASS	PASS
Overlapping Template Matchings Test	1,000000	PASS	PASS
Random Excursions Test	1,000000	PASS	PASS
Random Excursions Variant Test	1,000000	PASS	PASS

Rank Test	1,000000	PASS	PASS
Runs Test	0,146020	PASS	PASS
Serial Test	1,000000	PASS	PASS
Universal Test	1,000000	PASS	PASS
Overall	0,146020	PASS	PASS

Conclusion: The RNG is **ACCEPTED** as random at the 95% confidence interval.

Conclusion: The RNG is **ACCEPTED** as random at the 99% confidence interval.

3.3. EVALUATION OF THE TECHNICAL REQUIREMENTS

BMM has tested the new Amarix B.V. software AMARIX-RNG v1.0.0, against the relevant requirements of the Bulgaria online market:

DECREE № 31 OF 1 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE GENERAL TECHNICAL AND FUNCTIONAL REQUIREMENTS FOR GAMING SOFTWARE AND COMMUNICATION EQUIPMENT FOR ONLINE BETTING AND GAMES BY OTHER ELECTRONIC MEANS OF COMMUNICATION	Results		
	OK	Fail	Observations
Chapter II			
TECHNICAL AND FUNCTIONAL REQUIREMENTS FOR THE CENTRAL COMPUTER SYSTEM RELATED TO THE PARTICIPANTS IN GAMBLING GAMES			
2.1 Each and every organiser of remote games of chance must maintain a central computer system (CCS) meeting these requirements. When the CCS is not based on the territory of the Republic of Bulgaria, the regulations of this chapter and chapters III, V, VIII and IX shall apply respectively for the control local server under Art. 6, par. 4 of the GA.	☐	☐	N/A. Just RNG software evaluation.
Article 2.2 The central computer system of the operator must:			
2.2.1. store information about the process of verifying the identity of each participant in the remote gaming of chance and all data about the player;	☐	☐	N/A. Just RNG software evaluation.
2.2.2. To not allow registration for online betting and games through other electronic communication solutions to the vulnerable persons referred to in art. 10c, para. 2, pt. 1 and 2 and para. 3 of the GA;	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
2.2.3. to register the exact time of receipt of the information and each performed action with accuracy up to 1 second;	☐	☐	N/A. Just RNG software evaluation.
2.2.4. Record the exact time when information is obtained. The organizer should create guarantees that the information will be accessible only by authorized staff. The information must be provided upon request of the officials of the SCG (State Commission on Gambling).	☐	☐	N/A. Just RNG software evaluation.
2.3 The central computer system shall register the participants in the online betting and the games through other electronic means of communication by order and in a manner, determined in the ordinance of art. 17, para. 3, item 6 of GA.	☐	☐	N/A. Just RNG software evaluation.
Records and traceability			
2.4. The central control system must record and store:			
2.4.1 all game sessions of the participants;	☐	☐	N/A. Just RNG software evaluation.
2.4.2. a register of all the usernames of the players, the encrypted passwords and the IP addresses. the changes of the data must be tracked (this register is submitted to an audit);	☐	☐	N/A. Just RNG software evaluation.
2.4.3. all gaming accounts (active and deactivated) reflecting the deposited funds, the bets made and the paid winnings of the participants;	☐	☐	N/A. Just RNG software evaluation.
2.4.4. all data transfers between the profiles of the registered users and individual games;	☐	☐	N/A. Just RNG software evaluation.
2.4.5. all corrections, bonuses and other actions reflecting on the amounts in the gaming accounts.	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
2.5. The gaming account is opened when the registration process is completed, and the verification of the player is successfully done. The player must access to the account using a username and a password.	☐	☐	N/A. Just RNG software evaluation.
2.6.1. The CCS (Central Computer System) must generate reports on: 1.- All customer registrations (complete or incomplete);	☐	☐	N/A. Just RNG software evaluation.
2.- all registered participants, information about their gaming accounts and the date of registration.	☐	☐	N/A. Just RNG software evaluation.
2.7 The information under par. 4 shall be subject to audit of the information security according to the Ordinance on the minimum requirements for network and information security, adopted by Decree № 186 of the Council of Ministers of 2019 (SG, issue 59 of 2019).	☐	☐	N/A. Just RNG software evaluation.
Article 3 – Betting Games via SMS			
3.1 For the gambling via a short text message (SMS), the initial registration of participants is done through the website of the organizer or sending an SMS with the data of the participant to the operator.	☐	☐	N/A. Just RNG software evaluation.
3.2 After successfully completing the registration process and the verification of the participants, the operator must send to the player an SMS with a unique code as established by the rules of the organizer in the art. 22.1	☐	☐	N/A. Just RNG software evaluation.
3.3 The organizer provides the opportunity to deactivate a registration through a deactivation code.	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
3.4 The participant makes the bet by an electronic communications service through its individual electronic communication	☐	☐	N/A. Just RNG software evaluation.
3.5 The participant's access to gambling account is done through identification, verification and authorization of the phone number from which the bet was placed.	☐	☐	N/A. Just RNG software evaluation.
Article 4 – Information to the player			
4.1.1. The minimum information to provide to the players in online gaming is: The balance of the gaming account;	☐	☐	N/A. Just RNG software evaluation.
4.1.2. Bet history (bets placed and winnings);	☐	☐	N/A. Just RNG software evaluation.
4.1.3. Deposits, withdrawals and related transactions;	☐	☐	N/A. Just RNG software evaluation.
4.1.4. Information about the last IP address used by the player to access to the platform.	☐	☐	N/A. Just RNG software evaluation.
4.2 The information referred to the previous points must be made available to the players for at least 60 days. The information for the previous 12 months is provided on player's request. The operator has 10 days to fulfil this condition.	☐	☐	N/A. Just RNG software evaluation.
Article 5 – Account Deactivation			
5.1 The CCS (Central Computer System) must allow only authorized employees to activate and deactivate players accounts.	☐	☐	N/A. Just RNG software evaluation.
5.2 The central control system must record the circumstances under par. 1 when a gaming account is disabled, including information about its balance, the reason for the deactivation, and the name of the	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
employee who has deactivated the account.			
5.3 The central control system generates reports on gaming accounts, grouped according to their status of "activated" and "deactivated", their balances, the reasons for the changes of the status and the name of the employee who made the changes.	☐	☐	N/A. Just RNG software evaluation.
Article 6 – Connection Security			
6 The central control system generates an encrypted connection (such as SSL) for registration, identification, verification and changes made in the information for each participant.	☐	☐	N/A. Just RNG software evaluation.
Article 7- Registration of transactions			
7.1 the central computer system shall store information and generate a report for the participants in the online betting and games through other electronic means of communication, which have performed financial transactions - deposits or withdrawals of value equal to or exceeding Eur 15,000 or their BGN equivalent, whether the transactions were carried out through a single operation or through several related operations.	☐	☐	N/A. Just RNG software evaluation.
7.2 The central control system records all the deposits, bets, winnings including for each of them at least: 1. date and time 2. method of payment 3. player ID 4. amount; 5. type of transaction (e.g. "deposit", "withdrawal", etc..).	☐	☐	N/A. Just RNG software evaluation.
7.3 The central control system accepts	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
deposits to the operator's account only using methods of payment legally authorized in Bulgaria or EU.			
Article 8 - Reports			
8.1.1 The central control system generates reports that clearly indicate: - Amount of deposits in the gaming account and their concurrency;	☐	☐	N/A. Just RNG software evaluation.
8.1.2. Amounts deposited or withdrawn by the player categorized by each method of payment;	☐	☐	N/A. Just RNG software evaluation.
8.1.3. Rejected attempts to deposit;	☐	☐	N/A. Just RNG software evaluation.
8.1.4 all active gaming accounts	☐	☐	N/A. Just RNG software evaluation.
8.1.5 All the deactivated accounts in a specific financial year (including the reason of the deactivation).	☐	☐	N/A. Just RNG software evaluation.
Article 9			
9.1 The central control system accepts deposits from verified accounts only. if a player is not verified the operator must return eventual deposits before a bet is placed.	☐	☐	N/A. Just RNG software evaluation.
9.2 The central control system does not allow withdrawal of funds, which would result in a negative balance on the gaming account of the participant.	☐	☐	N/A. Just RNG software evaluation.
9.3 The central control system allows the participant to withdraw all funds from the gaming account and	☐	☐	N/A. Just RNG software evaluation.
9.4 provides clear and comprehensive information on restrictions on withdrawals when the withdrawal takes place. In the	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
event there is a gap between the time of the withdrawal and the update of the balance in the account, the player shall be clearly informed before having the possibility to make a new withdrawal.			
9.5 the operator must inform the player if there are fees for the deposits and the withdrawals	☐	☐	N/A. Just RNG software evaluation.
Article 10			
10.1 Stakes must be immediately deducted from player's balance in the CCS	☐	☐	N/A. Just RNG software evaluation.
10.2 Stakes that would create a negative balance in the CCS are not allowed	☐	☐	N/A. Just RNG software evaluation.
10.3 Winnings must be immediately credited to the gaming account	☐	☐	N/A. Just RNG software evaluation.
10.4 The central control system generates reports that clearly indicate the transfer of funds between player accounts and games.	☐	☐	N/A. Just RNG software evaluation.
Article 11			
11.1 The player must easily find information about T&Cs, restrictions, deadlines of bonuses and adjustments.	☐	☐	N/A. Just RNG software evaluation.
11.2 The information of the previous point must be part of the rules disclosed by the operator	☐	☐	N/A. Just RNG software evaluation.
11.3 Transfers of money between players accounts are not allowed by the CCS (Central Computer System).	☐	☐	N/A. Just RNG software evaluation.
11.4 The central control system contains a record of all the adjustments, bonuses and actions affecting the gaming account. This register is subject to an information security	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
audit.			
Article 12			
12.1 The data stored in the central control system under this section shall be stored in a local controlled server in the original format for a period of 5 years after the expiry of the limitation period for repayment of public debt associated with these data	☐	☐	N/A. Just RNG software evaluation.
12.2 The central control system stores information about the profiles of the participants and based on this information, generates reports on the activity of the players.	☐	☐	N/A. Just RNG software evaluation.
Article 13			
13.1 Gaming software and each new version of the software must be approved by the SCG (State Commission on Gambling) after being tested by a testing lab authorized to operate in Bulgaria	☐	☐	N/A. Just RNG software evaluation.
13.2 The gaming software must fulfil all the conditions of the chapter II in order to be offered on the market	☐	☐	N/A. Just RNG software evaluation.
Article 14			
14.1.1 Characteristics of games of chance: they must give realistic expectations about chances of winning with an accurate presentation of all the results and events that have an influence on the games; playing with bonuses must replicate the conditions of playing with real money;	☐	☐	N/A. Just RNG software evaluation.
14.1.2 The game of chance must clearly inform a player if his/her behaviour has an impact on the game;	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
14.1.3 The game of chance must be implemented according to its rules.	☐	☐	N/A. Just RNG software evaluation.
14.2 The game conditions and rules for each gambling game must be described in detail in the rules of the organizer, approved according to art.17, para.1, item 4 of GA. The rules of the game must be accessible to the participant through the same environment and in the same place used for the games. The central computer system must require the participant to explicitly accept the rules of the game, which cannot be changed in one game session.	☐	☐	N/A. Just RNG software evaluation.
14.3 For games in which the bet is made by electronic means of communication, the rules should be available on the website of the organizer, to which the organizer refers upon registration, and the participant confirms that he has read them before making the bet.	☐	☐	N/A. Just RNG software evaluation.
Article 15			
15.1 The CCS (Central Computer System) must meet the following requirements: - Virtual slot machines must have at least a 80% return of the total amount of bets;	☐	☐	N/A. Just RNG software evaluation.
15.2 Automatically limit the number of players in the virtual gambling table or virtual slot machine depending on the simultaneous gaming sessions, as explained by the organiser in the license application form;	☐	☐	N/A. Just RNG software evaluation.
15.3 Guarantee a minimum duration of at least three seconds for each gaming session, except for the games on virtual gaming machines;	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
15.4 Guarantee that the participation in each and every game is a result of the explicit agreement of the participant;	☐	☐	N/A. Just RNG software evaluation.
15.5 Offer the participant an option to select images such as "play", "hold", "draw", "double", etc., only in the cases when the player has had enough time to consider the consequences of his/her action;	☐	☐	N/A. Just RNG software evaluation.
15.6 Ensure the games and their results are not dependent on the features of the player's device and/or the communication channel;	☐	☐	N/A. Just RNG software evaluation.
15.7 Provide a realistic behaviour for games that include simulation of a physical object (dice, roulette wheels, etc.), giving a true and fair result in line with the expectations related to that physical object.	☐	☐	N/A. Just RNG software evaluation.
Article 16			
16.1 The Central Computer system must provide: - Rules accessible from all the pages of the game;	☐	☐	N/A. Just RNG software evaluation.
16.2 - The name of the game displayed in all pages related to the game;	☐	☐	N/A. Just RNG software evaluation.
16.3 - Balance displayed or available in all pages of the game;	☐	☐	N/A. Just RNG software evaluation.
16.4 - Bet history of each different game.	☐	☐	N/A. Just RNG software evaluation.
Article 17			
17.1 The CCS (Central Computer System)	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
must: - When depositing, provide clear and unambiguous information about the currency used or the rate exchange if a different currency is used;			
17.2 - Show all the possible winning combinations in graphic and / or text;	☐	☐	N/A. Just RNG software evaluation.
17.3 - clearly show the minimum and maximum bet that can be made in the game;	☐	☐	N/A. Just RNG software evaluation.
17.4 - provide participants information about how the prizes are formed and paid	☐	☐	N/A. Just RNG software evaluation.
Article 18			
The platform must display for each game: 1. A clear and comprehensive outcome of the game;	☐	☐	N/A. Just RNG software evaluation.
2. The prizes;	☐	☐	N/A. Just RNG software evaluation.
3. Only winning combinations that the customer can get with their selections.	☐	☐	N/A. Just RNG software evaluation.
Article 19			
19.1 The info for the players must be in Bulgarian.	☐	☐	N/A. Just RNG software evaluation.
Section IV - Additional requirements for the Games Virtual Gaming Equipment			
Article 20			
20.1 The gaming software should show all games on virtual gaming machines in a clear	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
and specific way.			
20.2. The prizes for each symbol or combination of symbols must be situated in a place that has visual connection with the respective symbol, where:	☐	☐	N/A. Just RNG software evaluation.
20.2.1. it is displayed the number of symbols requested to get a prize;	☐	☐	N/A. Just RNG software evaluation.
20.2.2 symbols falling on the same winning scale are placed in an area associated with this winning scale;	☐	☐	N/A. Just RNG software evaluation.
20.2.3. when a prize can be won based on different combinations of symbols, the illustration should clearly show the combination;	☐	☐	N/A. Just RNG software evaluation.
20.2.4 Symbols must not change in terms of shape and colour from a game to another (excluding when animations are used).	☐	☐	N/A. Just RNG software evaluation.
20.3 The gaming software must use a graphic image to show the maximum bet, the possible number of bet credits in each selected line and the total number of possible lines.	☐	☐	N/A. Just RNG software evaluation.
Article 21			
21.1 For card games, the system must clearly display value and symbols;	☐	☐	N/A. Just RNG software evaluation.
21.2 Show graphically the number of decks used if it is more than one;	☐	☐	N/A. Just RNG software evaluation.
21.3 Simulate the game based on its rules	☐	☐	N/A. Just RNG software evaluation.
Article 22			

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	OK	Fail	Observations
22.1 In case of a roulette game, the system must visually display a roulette wheel	☐	☐	N/A. Just RNG software evaluation.
Article 23			
23.1 In the case of dice games, the gaming software must visually recreate the traditional dice.	☐	☐	N/A. Just RNG software evaluation.
23.2 If the dice used are not traditional, the information about that shall be contained in the rules of the game, which should also describe the design of the dice.	☐	☐	N/A. Just RNG software evaluation.
Article 24			
24.1.1 The Central control system must ensure that: the actual funds transferred to a jackpot correspond to the deductions, determining the jackpot in question, indicated in the rules under Art. 22, par. 1, p. 11 of the GA; these funds cannot exceed 5% of each bet for the virtual gaming machines or the percentage of each bet, indicated in the rules under Art. 22, par. 1, p. 11 of the GA (Gambling Act) for the rest of the virtual games;	☐	☐	N/A. Just RNG software evaluation.
24.1.2 in a game forming more than one bonus jackpot, each having its own deduction, the total amount of the deductions from each bet must not exceed the percentage under p. 1;	☐	☐	N/A. Just RNG software evaluation.
24.1.3 The bonus balance must be always available in the UI of the games involved on it;	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
24.1.4 When the conditions for triggering a bonus include a winning combination related to certain circumstances (bet, denomination, line of forming, etc.), these must be described in the rules of the game; when the game forms more than one jackpot and forming a certain winning combination is a condition for winning, the rules of the game should unambiguously determine which of them can be won under what conditions;	☐	☐	N/A. Just RNG software evaluation.
24.1.5 If the jackpot replaces a normal winning, the next normal winning can't be lower than the one that was replaced by the jackpot (taking into account the stake)	☐	☐	N/A. Just RNG software evaluation.
24.1.6 Winning a jackpot prize should be possible only by playing the game with predetermined jackpot configurations and conditions. (Bet, time, initial and final accumulated values... etc), without having to hit any specific winning combination – Mystery Jackpot Prize;	☐	☐	N/A. Just RNG software evaluation.
24.1.7 When it is possible to win a prize or a level of the Jackpot through additional Bonus game (a prize different from any the base game payable), played in the same interface or different interface, the access to this Bonus game should be through a specific combination or randomly;	☐	☐	N/A. Just RNG software evaluation.
24.1.8 When the bonus is a condition to form a certain winning combination, a possibility to change the configuration parameters shall be provided only after it is won; when the bonus is a mystery one with more than one level of accumulation, in case of change of configuration parameters,	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
the funds accumulated must be maintained;			
24.1.9 When a jackpot is won, an indication of the occurrence of this event shall appear in each gaming session related to this jackpot.	☐	☐	N/A. Just RNG software evaluation.
Article 25			
25.1 The Jackpot parameters must not change till all the players trying to win it finish their sessions.	☐	☐	N/A. Just RNG software evaluation.
25.2 Any Changes to the jackpot system will come into force only after the jackpot is won.	☐	☐	N/A. Just RNG software evaluation.
Article 26			
26.1.1 The game software must ensure that the sum of the current jackpot is displayed on the equipment of all participants in a maximum time interval of 30 seconds.	☐	☐	N/A. Just RNG software evaluation.
26.1.2 The game software must clearly indicate whether the participant playing for a jackpot.	☐	☐	N/A. Just RNG software evaluation.
Article 27			
27.1.1 The game software must maintain a record which is subject to information security audit, about the status of the jackpot including :1. date and time of each event;	☐	☐	N/A. Just RNG software evaluation.
27.1.2 TYPE OF THE EVENT / ACTION;	☐	☐	N/A. Just RNG software evaluation.
27.1.3 Configuration;	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
27.1.4 Amount of accumulated deductions;	☐	☐	N/A. Just RNG software evaluation.
27.1.5 prizes;	☐	☐	N/A. Just RNG software evaluation.
27.1.6 authorized personnel accesses.	☐	☐	N/A. Just RNG software evaluation.
27.2 The gaming software stores the status of the jackpot on a duplicate medium that is error proof	☐	☐	N/A. Just RNG software evaluation.
27.3 The game software must reproduce information on the amounts of bonus jackpots and jackpot winnings, based on the bets placed by the players	☐	☐	N/A. Just RNG software evaluation.
Section V - Management of gambling, registers and data storage			
Article 28			
28.1. The platform must be able to immediately activate and deactivate individual games, all the games and individual players	☐	☐	N/A. Just RNG software evaluation.
28.2 Information about the activation and deactivation of par. 1 is recorded	☐	☐	N/A. Just RNG software evaluation.
28.3 When a game is deactivated, it can't be accessible and it is displayed as unavailable	☐	☐	N/A. Just RNG software evaluation.
28.4 When a game is disabled, the player can complete the other games already started	☐	☐	N/A. Just RNG software evaluation.
28.5 If the disabled game has several stages, the player must be able to complete the current level; otherwise they must be informed that it is not possible, and the session must be saved	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
Article 29			
29.1 The player must have the possibility to complete pending games	☐	☐	N/A. Just RNG software evaluation.
29.2.1 1. There is an incomplete game in the following situations: - loss of connection (apart from the cases under art. 60 and 62 of the GA (Gambling Act));	☐	☐	N/A. Just RNG software evaluation.
29.2.2 reboot of the system;	☐	☐	N/A. Just RNG software evaluation.
29.2.3 game deactivation;	☐	☐	N/A. Just RNG software evaluation.
29.2.4 reboot of the player's device and player's attempt to access the system;	☐	☐	N/A. Just RNG software evaluation.
29.2.5 log out not depending on the player.	☐	☐	N/A. Just RNG software evaluation.
29.3 When an incomplete game is available, this game is displayed to the player. if it is a tournament game with several players taking part and its status didn't depend on a platform's failure, the game is not considered an incomplete game for that player	☐	☐	N/A. Just RNG software evaluation.
29.4 The platform must inform the player about all their incomplete games, stakes included.	☐	☐	N/A. Just RNG software evaluation.
29.5 Pending wagers (of incomplete games that can be finished) are kept in a separate balance and displayed separately.	☐	☐	N/A. Just RNG software evaluation.
29.6 The rules must explain the procedure to complete a pending game. A game can keep this pending status for 30 days, after this term the game will be finished based on the rules of the operator.	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
29.7 If the system is not able to provide the possibility to complete a game, it must calculate eventual funds to return to the player.	☐	☐	N/A. Just RNG software evaluation.
Article 30			
30.1 The procedure for handling errors in the CCS (Central Computer System) must be clearly described.	☐	☐	N/A. Just RNG software evaluation.
30.2 The system must record all the system errors, including their reasons and solutions	☐	☐	N/A. Just RNG software evaluation.
30.3 A system error under par. 2 is any change occurred in the system due to factors, excluding human intervention, violating its integrity and functionality.	☐	☐	N/A. Just RNG software evaluation.
30.4 The central computer system generates a report based on data collected under par. 2.	☐	☐	N/A. Just RNG software evaluation.
Article 31			
31.1 The actions of the participant during the session are recorded in a register as session information.	☐	☐	N/A. Just RNG software evaluation.
31.2 The CCS (Central Computer System) must save information and allow reporting about sessions & players as required by the ordinance. 6, paragraph 1, item 4 of the PF Kit.	☐	☐	N/A. Just RNG software evaluation.
31.3.1 The CCS (Central Computer System) must store the following information about player's session: Player ID;	☐	☐	N/A. Just RNG software evaluation.
31.3.2 Starting and ending time of the	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
session;			
31.3.3 IP-address or number of the electronic means of communication	☐	☐	N/A. Just RNG software evaluation.
31.3.4 Total amount of money bet in the session	☐	☐	N/A. Just RNG software evaluation.
31.3.5 Total stakes that generated winnings during the session	☐	☐	N/A. Just RNG software evaluation.
31.3.6 Deposits in the session (with timestamp)	☐	☐	N/A. Just RNG software evaluation.
31.3.7 Withdrawals (with timestamp)	☐	☐	N/A. Just RNG software evaluation.
31.3.8 Date, time and duration of a gaming session	☐	☐	N/A. Just RNG software evaluation.
31.3.9 Reason for the end of the session	☐	☐	N/A. Just RNG software evaluation.
31.3.10 Information about the game during the session.	☐	☐	N/A. Just RNG software evaluation.
31.4.1 The CCS (Central Computer System) must store the following information about the participant: information to determine the identity of the participant;	☐	☐	N/A. Just RNG software evaluation.
31.4.2 information and balance of the gaming account;	☐	☐	N/A. Just RNG software evaluation.
31.4.3 deactivated accounts and the reason for their deactivation.	☐	☐	N/A. Just RNG software evaluation.
31.5.1 The CCS (Central Computer System) must store the following information about the games played by the player: Player's ID;	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
31.5.2 identification date of the participant;	☐	☐	N/A. Just RNG software evaluation.
31.5.3 starting time of the game;	☐	☐	N/A. Just RNG software evaluation.
31.5.4 balance when the game starts;	☐	☐	N/A. Just RNG software evaluation.
31.5.5 bets (with timestamp);	☐	☐	N/A. Just RNG software evaluation.
31.5.6 game status (ongoing, complete, and others);	☐	☐	N/A. Just RNG software evaluation.
31.5.7 outcome of the game (with timestamp);	☐	☐	N/A. Just RNG software evaluation.
31.5.8 the winning of the jackpot (if applicable);	☐	☐	N/A. Just RNG software evaluation.
31.5.9 time when the game ends;	☐	☐	N/A. Just RNG software evaluation.
31.5.10 winnings;	☐	☐	N/A. Just RNG software evaluation.
31.5.11 balance of gaming account at the end of the game;	☐	☐	N/A. Just RNG software evaluation.
31.6.1 The CCS (Central Computer System) must store information about the following events: financial transactions - deposits or withdrawals of value equal to or exceeding 15000 euro or the equivalence in leva, irrespective of whether the transactions are carried out by one operation or through several related operations;	☐	☐	N/A. Just RNG software evaluation.
31.6.2 changes made to the parameters of the games	☐	☐	N/A. Just RNG software evaluation.
31.6.3 changes made to jackpot parameters	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
31.6.4 new jackpots;	☐	☐	N/A. Just RNG software evaluation.
31.6.5 payment of the jackpot;	☐	☐	N/A. Just RNG software evaluation.
31.6.6 removal the pot;	☐	☐	N/A. Just RNG software evaluation.
31.6.7 Opening of gaming accounts and their deactivation / closure;	☐	☐	N/A. Just RNG software evaluation.
31.6.8 Updates of players' personal data;	☐	☐	N/A. Just RNG software evaluation.
31.6.9 Loss of communication with player's device.	☐	☐	N/A. Just RNG software evaluation.
Article 32			
32.1 The CCS (Central Computer System) keeps a log of all the games under the art. 71, par. 2 and Art. 73 of the GA (Gambling Act).	☐	☐	N/A. Just RNG software evaluation.
32.2 The central computer system must not allow the player to play against themselves. The way of preventing such possibility should be described in the terms and conditions of the operator according to ART. 17, PARA. 1, ITEM 4 OF GA	☐	☐	N/A. Just RNG software evaluation.
Article 33			
33.1 Games where the results are presented as based on a random principle must be based on a random number generator, which should be tested in a laboratory ENTERED IN THE REGISTER UNDER ART. 20, PARA. 1, ITEM 4 OF GA.	☒	☐	
Article 34			

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	OK	Fail	Observations
34.1 The random number generator (RNG) must meet the following requirements: 1. the results must: a) be statistically independent, b) correspond to the desired random distribution c) pass various generally recognised statistical tests selected by the testing laboratory and suitable for the respective RNG with a confidence interval of at least 95%, for example: χ^2 - Test (Chi-Square Test); serial correlation test (Serial Correlation Test); test Poisson distribution (Poisson Distribution Test); test frequency (Frequency test); Poker test (Poker Test); as testing laboratory selects appropriate tests depending on RNG. 34.2. be protected against any interference that may impact the results from the generator 34.3. in case it is used for mapping, the mapping sequence of the numbers must undergo the same statistical tests that are relevant to the number sequence, produced by the RNG; mapping algorithms must not lead to biasness or creation of models.	☒	☐	Empirical, Die Hard, Nist tests.
Section VII - Games range in which a random number generator used game table in a casino			
Article 35			
For gambling games in online betting and games through other electronic means of communication, in which a gaming table in a gambling casino is used for GSC, the general obligatory gaming conditions and rules for gambling games in a gambling casino shall be applied according to the ordinance under art. 17, para. 3, item 1 of the insurance act and the ones approved by the executive director of the national revenue agency on	☐	☐	Not defined for a game table.

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	OK	Fail	Observations
the grounds of art. 17, para. 1, item 4 of GA rules.			
Article 36			
36.1 Tables in the land-based casino must be of a type approved by the SCG (State Commission on Gambling) ENTERED IN THE REGISTER UNDER ART. 20, PARA. 2 OF GA.	☐	☐	N/A. Just RNG software evaluation.
Article 37			
37.1 The CCS (Central Computer System) must automatically limit the number of gaming seats on the virtual gaming table depending on the number of simultaneous gaming sessions the organiser has stated upon the issuance of its license.	☐	☐	N/A. Just RNG software evaluation.
Article 38			
38.1 The gaming equipment of the land-based casino must only be used as RNG. The virtual table can also have its own RNG for the different games (roulette, card games, dice, etc.).	☐	☐	N/A. Just RNG software evaluation.
Article 39			
39.1 The CCS (Central Computer System) must include video surveillance for the casino tables used as RNG.	☐	☐	N/A. Just RNG software evaluation.
39.2 Video surveillance under par. 1 is carried out in a way that provides evidence of compliance with the rules of the game and to identify deviations.	☐	☐	N/A. Just RNG software evaluation.
39.3 Video surveillance under par. 1 must include information about the date and time of each event.	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
Section VIII - Technical and functional requirements for the central computer system of the protection of information			
Article 40			
THE CCS MUST BE ABLE TO PROVIDE:	☐	☐	N/A. Just RNG software evaluation.
40.1 business continuity during power outages,	☐	☐	N/A. Just RNG software evaluation.
40.2 maintaining records of the system and generate reports based on them.	☐	☐	N/A. Just RNG software evaluation.
40.3 detection and prevention of unauthorized access and unauthorized activation and / or malicious code	☐	☐	N/A. Just RNG software evaluation.
40.4 uninterrupted remote access of the bodies of nra and state agency “national security” to the control local server under art. 6, para. 4 of the GA.	☐	☐	N/A. Just RNG software evaluation.
Article 41			
41.1 (1) the ccs must be designed in a way ensuring that the servers (financial and/or game) in the same broadcast domain do not allow alternative network paths, overcoming the firewall. (2) the firewall ensures control, safety and security features. the access is possible only to the administrators. (3) the access to the firewall should be limited to workstations within the base configuration. (4) firewall rejects and prevents commands coming from outside the base configuration. (5) each firewall must maintain a history book subject to control and audit, containing all the successful and unsuccessful attempts to connect and the changes in the parameters with an impact in	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
the connection			
Article 42			
42.1 All data are sent through public networks must be encrypted	☐	☐	N/A. Just RNG software evaluation.
42.2 All connections between geographically dispersed systems must require identification, authorization and verification.	☐	☐	N/A. Just RNG software evaluation.
42.3.1 All communications between geographically dispersed systems must be protected against: incomplete transmission;	☐	☐	N/A. Just RNG software evaluation.
42.3.2 rooting errors and unauthorized messages received;	☐	☐	N/A. Just RNG software evaluation.
42.3.3 unauthorized alteration of messages;	☐	☐	N/A. Just RNG software evaluation.
42.3.4 unauthorized disclosure of information;	☐	☐	N/A. Just RNG software evaluation.
42.3.5 unauthorized duplication of messages;	☐	☐	N/A. Just RNG software evaluation.
42.3.6 unauthorized release of CCS (Central Computer System)	☐	☐	N/A. Just RNG software evaluation.
Article 43			
43.1 The organizer of gambling uses a protected primary DNS and a secondary DNS physically separated from the primary.	☐	☐	N/A. Just RNG software evaluation.
Article 44			

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	OK	Fail	Observations
44.1 The CCS (Central Computer System) must maintain records of events related to information security, which are subject to information security audits. The information is archived every 6 months and stored for a period of at least 5 years.	☐	☐	N/A. Just RNG software evaluation.
Section IX - Access control			
Article 45			
45.1 The organizer of online betting creates a procedure for determining of levels of access to CCS for employees, consultants or third party authorized persons depending on the nature of the tasks assigned to them and in compliance with the contract signed with them.	☐	☐	N/A. Just RNG software evaluation.
45.2 The organizer of online betting creates a procedure for immediate termination of access to the CCS for employees, consultants or third party authorized persons with which the contractual relations have been terminated.	☐	☐	N/A. Just RNG software evaluation.
Article 46			
46.1 The gambling games organizer must introduce a strict policy for identifying, authorizing and verifying the rights for access of the participant.	☐	☐	N/A. Just RNG software evaluation.
46.2 The central computer system shall terminate the participant's access to the system, if he is not active over a certain period of time during the client session, referred to in the organizer's rules approved according to Art. 17, para. 1, pt. 4 of the GA, and the conditions, in which the access of the participant may be renewed.	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
Article 47			
47.1 The CCS (Central Computer System) must have strict restrictions on access of employees, consultants or third parties to the information about players, accounts and special rights and privileges	☐	☐	N/A. Just RNG software evaluation.
47.2 The CCS (Central Computer System) maintains accounts of employees, consultants or third parties with differentiated credentials and privileges	☐	☐	N/A. Just RNG software evaluation.
47.3 The CCS (Central Computer System) controls the assignment and distribution of passwords and credentials to employees, consultants or authorized third parties	☐	☐	N/A. Just RNG software evaluation.
Article 48			
48.1 The CCS's operations related to system management and described above must be on a separate network.	☐	☐	N/A. Just RNG software evaluation.
Article 49			
49.1 Employees must have completed the process of identification, authorization and verification prior to obtaining access to network functions	☐	☐	N/A. Just RNG software evaluation.
49.2 The CCS (Central Computer System) shall prevent unauthorized access or internal access by the players to network functions	☐	☐	N/A. Just RNG software evaluation.
49.3 Each user has a unique username or identification number that cannot be used by another person	☐	☐	N/A. Just RNG software evaluation.
49.4 Routing management functions shall be applied to control the access to important	☐	☐	N/A. Just RNG software evaluation.

DECREE № 31 OF 1 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE GENERAL TECHNICAL AND FUNCTIONAL REQUIREMENTS FOR GAMING SOFTWARE AND COMMUNICATION EQUIPMENT FOR ONLINE BETTING AND GAMES BY OTHER ELECTRONIC MEANS OF COMMUNICATION	Results		
	OK	Fail	Observations
system components			
49.5 The central computer system should not allow persons without authorized credentials to install equipment or software that can bypass the system control elements and the control elements of validity of the CCS (Central Computer System)	☐	☐	N/A. Just RNG software evaluation.
49.6 All operating systems and installations in the CCS (Central Computer System) must be limited as far as possible to the basic (safe) functions	☐	☐	N/A. Just RNG software evaluation.
Article 50			
50.1 The operators offering games of chance shall apply procedures to control the access to the OS, software, information and security	☐	☐	N/A. Just RNG software evaluation.
Article 51			
51.1 All keys and encryption codes must be stored on a secure safe with advanced data protection functionalities	☐	☐	N/A. Just RNG software evaluation.
Article 52			
52.1 The CCS (Central Computer System) must be submitted to vulnerability and penetration tests, which necessarily include all public interfaces that save, process and communicate information about players, data on participation in games and financial information	☐	☐	N/A. Just RNG software evaluation.
52.2 Tests of vulnerability under par. 1 must be done every three months and penetration tests at least once a year	☐	☐	N/A. Just RNG software evaluation.
52.3 The CCS (Central Computer System)	☐	☐	N/A. Just RNG software evaluation.

DECREE № 31 OF 1 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE GENERAL TECHNICAL AND FUNCTIONAL REQUIREMENTS FOR GAMING SOFTWARE AND COMMUNICATION EQUIPMENT FOR ONLINE BETTING AND GAMES BY OTHER ELECTRONIC MEANS OF COMMUNICATION	Results		
	OK	Fail	Observations
generates a report on tests performed under par. 1.			
Article 53			
53.1 The reports referred to these general technical and functional requirements must also be produced on request of the SCG (State Commission on Gambling)	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
Chapter II - Registration and identification of participants in remote games			
Art. 2.1 The CCS (Central Computer System) must have a system for registration and identification of the participants in the games of chance	☐	☐	N/A. Just RNG software evaluation.
Art. 2.2 Each player in the remote games must be registered in the system under par. 1 in order to take part in them. For online gambling, the system must identify and register the participants from the territory of the Republic of Bulgaria based on the	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
geographical localization of their IP addresses. For gambling games carried out via electronic communication devices, the system must identify and register the participants, sending short text messages (SMSs) from the territory of the Republic of Bulgaria			
Art.2.3 Only physical entities aged 18 and over can register to participate	☐	☐	N/A. Just RNG software evaluation.
Art 2.4 The vulnerable persons, indicated in art. 10c, para. 2, items 1 and 2 of GA, and the persons under art. 10c, para. 3 of GA, entered in the register under art. 10d of GA.	☐	☐	N/A. Just RNG software evaluation.
Art 2.5 the gambling games organizers process personal data subject to the requirements of regulation (eu) 2016/679 of the European parliament and of the council from 27 April 2016 on the protection of individuals in connection with the processing of personal data and on the free movement of such data and for annulment of directive 95/46/ec (ob, l 119 of 4 may 2016) and the law for protection of personal data.	☐	☐	N/A. Just RNG software evaluation.
Art.3.1 The organizers must mandatorily obtain the following information about the identity of the individual wishing to register as participant in a remote game of chance:	☐	☐	N/A. Just RNG software evaluation.
Art.3.1.1. citizenship;	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
Art.3.1.2. official name based on an ID document;	☐	☐	N/A. Just RNG software evaluation.
Art.3.1.3 identification number of the player. This can be a personal identification number or the personal number of a foreigner or another identification data if the players is not a Bulgarian citizen	☐	☐	N/A. Just RNG software evaluation.
Art.3.1.4 for those who do not have a personal identification number or personal number of foreigners must provide temporary or permanent residence in Bulgaria or in another country, date of birth, number, date and place of issue of identity documents	☐	☐	N/A. Just RNG software evaluation.
Art.3.2 In case of any doubt the information already obtained regarding the identity of the player is not sufficient or reliable, the organizers of games of chance must require additional proof of identity.	☐	☐	N/A. Just RNG software evaluation.
Art.4.1 Organizer shall only register individuals who have provided the information under Article 3.	☐	☐	N/A. Just RNG software evaluation.
Art 4.2 the refusal of a person to provide the information under art. 3 gives the organizer the right to refuse registration of the person to participate in online betting.	☐	☐	N/A. Just RNG software evaluation.
Art.5 Organizers must keep a register of participants in the games, which must contain information about the initial	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
registration of the participant, his/her ID data, username which he/she uses to access the games, IP address and number of the electronic communication device from which the registration for participation has been made, the IP addresses or number of the electronic communication devices from which the participant has accessed the games, data about received complaints and claims from the participant.			
Art.6 Verification of identity under art 3.2 are performed in accordance with the operator's rules for the technical and functional requirements for the gaming software and communications equipment used in online betting and gaming via other electronic means of communication.	☐	☐	N/A. Just RNG software evaluation.
Chapter III - Automated submission of information to the National Revenue Agency			
The central computer system of the organizer of online betting, CCS of games organizer through other electronic communications means and CCS of an organizer of games under Art. 55, 57, 59, 60 and 62 of the GA must provide an automated submission to the NRA server of the information referred to in Art. 8 and 9.	☐	☐	N/A. Just RNG software evaluation.
Art. 8 The organizers of remote games of chance must store on their local server and send to the NRA server the following data about remote games of chance:	☐	☐	N/A. Just RNG software evaluation.
Art.8.1 registration data for the gambling game organizer - submitted according to	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
Annex nr. 1			
Art. 8.2 registration data for online betting participants - submitted according to Annex nr. 2 immediately after initial registration of the participant and after each change in the registered data;	☐	☐	N/A. Just RNG software evaluation.
Art. 8.3. Data about each completed event-these should be submitted at the end of each game in accordance with Appendix No.3; best on events that have not been completed are charged in active games	☐	☐	N/A. Just RNG software evaluation.
Art.8.4 data according to Annex nr. 4 for the unfinished events (active games) at the end of the reporting period under Art. 30, para. 8 of the GA.	☐	☐	N/A. Just RNG software evaluation.
Art 8.5 upon request - data about the unfinished events (active games) at the time of request in accordance with Annex nr. 8.	☐	☐	N/A. Just RNG software evaluation.
Art.9 The organizers of games of chance under Art. 55, 57, 60 and 62 of the GA (Gaming Act) must send to an NRA server the following information:	☐	☐	N/A. Just RNG software evaluation.
Art.9.1 Registration data about the organizer of games of chance -these must be submitted after certificate of licenses issued, modification or termination of the license in accordance with Annex n°5.	☐	☐	N/A. Just RNG software evaluation.
Art.9.2 Data about each completed event-according to Annex n° 7:	☐	☐	N/A. Just RNG software evaluation.
Art.9.3 Data about purchased / imported certification signs for participation (for the games where this is required) - these should	☐	☐	N/A. Just RNG software evaluation.

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	OK	Fail	Observations
be submitted on the day of buying importing the certifications signs/ according to Appendix No.7			
Art 9.4 data about the unfinished events (active games) at the end of the reporting period under art. 30, para. 8 of the ga; the data is submitted according to annex nr. 4 within 3 days after the expiry of the reporting period;	☐	☐	N/A. Just RNG software evaluation.
Art 9.5 upon request - data about the unfinished events (active games) at the time of request in accordance with annex nr. 5.	☐	☐	N/A. Just RNG software evaluation.
Art.10 At the time of submission of information under Art. 8 and 9, organizers must by all means use the codes, determined for the respective types of games of chance under the GA (Gaming Act), indicated in Appendix No. 9	☐	☐	N/A. Just RNG software evaluation.
Art.11.1 The data under 8 and 9 are delivered online as an XML message in a format and structure in accordance with the descriptions in Appendix NO. 1, 2, 3, 5, 6, 7, 8 AND 9	☐	☐	N/A. Just RNG software evaluation.
Art.11.2. The National Revenue Agency sends back a confirmation message for each received XML message from an organizer of games of chance, as well as the status of the operation. as described in Annexes nr. 1, 2, 3, 5, 6, 7, 8 and 9.	☐	☐	N/A. Just RNG software evaluation.
Art.11.3 In the case no confirmation from the NRA has been received or in the case of confirmation message indicating an	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
operation of the status other than "successful", the organizer of games of chance must send the message with valid data again every 30 minutes until a confirmation that the message has been successfully received.			
Art.11.4 Upon request of the SCG (State Commission on Gambling) or NAP under ART 8 and 9 are provided by organizer of gambling in Excel or another readable format.	☐	☐	N/A. Just RNG software evaluation.
Art.12 Providing information to the server SGG (State Commission on Gambling) and the NRA (Nat. Revenue Agency) is done by employees of the organizers of gambling lines provide continuous 24 hours 7-day connectivity between the respective organizer of games chance and the NRA and server SGG	☐	☐	N/A. Just RNG software evaluation.
Art.13 The organizer of remote games of chance under Art.55, 57, 50 and 62 of the GA (Gambling Act) are responsible for the identity and completeness of the data under Art.8 and Art.9	☐	☐	N/A. Just RNG software evaluation.
Art.14 The organizers of remote games of chance and organizers of gambling Art.55, 57 60 and 62 of GA (Gaming Act) store all sent SCG to server and NAP XML message in their original form and received by SCG server and NAP -messaging endorsements and whether information status of communication with the server of SCG (State Commission on Gambling) and the NRA (Nat. Revenue Agency) on the term of art.6 para 4 GA (Gaming Act).	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
Chapter IV - Storage and remote access SCG (State Commission on Gambling), NRA (National Revenue Agency) and SANS to control			
Art.15.1 The organizers of remote games of chance should ensure the preservation of all data relating to the supply of gambling services on the territory of the Republic of Bulgaria, storage equipment (control local server), situated on the territory of the Republic of Bulgaria, that performs functions of local control server.	☐	☐	N/A. Just RNG software evaluation.
Art.15.2 Data on the control local server is stored for all events participants in each of the territory of the Republic of Bulgaria with their individual player accounts, financial transfer made bets and paid profits. The data are completely identical to those in CCU organizers online betting.	☐	☐	N/A. Just RNG software evaluation.
Art.15.3 The organizers of the online betting ensure continuous remote data access control local server control authorities of SCG, NRA SANS and the opportunity to generate a sample of the database in format XML, Excel or another readable format. The access is accomplished by encrypted internet connection.	☐	☐	N/A. Just RNG software evaluation.
Art.15.4 the control local server must store information about the exact date, time and type of actions performed. at the request of the nra and the sans, the organizer shall provide information about the access of the control bodies and the parameters of the data generated/exported.	☐	☐	N/A. Just RNG software evaluation.
Art 16 In the event of hardware or software defects control local server maximum	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
allowable period in which SCG, NRA and National Security Agency to have access to data stored on it is no more than 6 hours total per month. The organizers are responsible for storing the data in those periods and for storage of data in case where local control server organizer is available or not functioning. The collected data in such periods should be stored in a local control server after recovery functionality.			
Art.17 the organizers must store the data on the control local server in the same state, as they are created, within the term under art. 6, para. 4 of the ga	☐	☐	N/A. Just RNG software evaluation.
Art.18 upon request and for the purposes of the current control, carried out by the NRA, the organizers are required to provide specific data from the control local server on an electronic medium within five working days of the date handing the request.	☐	☐	N/A. Just RNG software evaluation.
Art.19.1 Data in local control server should be separated logically and safely from any other data.	☐	☐	N/A. Just RNG software evaluation.
Art.19.2 The organizers must necessarily create a mirror copy of all data control server to be physically separated and stored on separate storage devices that are stored in Bulgaria.	☐	☐	N/A. Just RNG software evaluation.
Chapter IV			
Documentation and storage information			

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
Art 20.1 for approval of systems for automated information submission to a nra server, the organizers shall submit a request to the executive director of the nra, which shall contain data about the identification of the requester and contact details.	☐	☐	N/A. Just RNG software evaluation.
Art 20.2 the request under para. 1 shall be submitted together with the license issuing request, with documentation attached, which proves that the ccs and the control local server meet the requirements of this ordinance.	☐	☐	N/A. Just RNG software evaluation.
Art 20.3 all documentation must be provided in Bulgarian language and in electronic format.	☐	☐	N/A. Just RNG software evaluation.
Art 20.4 the documentation must contain a description of the functions of the system under para. 1, the maintenance procedures and description of error messages.	☐	☐	N/A. Just RNG software evaluation.
Art.21.1 the examination of the request and the documents attached to it shall be carried out within 30 days of its receipt. the functionality of the information submitting system to the nra is tested in the course of building the communication connectivity with the nra server, with the purpose nra to provide the organizer with access to the test environment, and the organizer to provide access to the user and/or administrative interface of the system.	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
Art.21.2 after examining of the request and the documents attached and in accordance with the results of the testing under para. 1 a motivated proposal is prepared to the executive director of the nra regarding the approval of automated information submission systems to the nra server.	☐	☐	N/A. Just RNG software evaluation.
Art.21.3 based on the proposal under para. 2 the executive director of the nra issues a decision. the requester is notified about the decision under art. 27, para. 1 of the ga.	☐	☐	N/A. Just RNG software evaluation.
Art.21.4 in the event of a non-compliance of the request and the documents with the requirements of the ordinance or the ga, the nra executive director notifies the requester under art. 23, para. 6 of the ga, and sets a reasonable period of time for removal of the inconsistencies, during which the time limit under para. 1 stops running.	☐	☐	N/A. Just RNG software evaluation.
Art 21.5 When the requester submits evidence about the removal of the identified inconsistencies in the timeframe determined under para. 4, the term under para. 1 begins to run again from the date of their submission.	☐	☐	N/A. Just RNG software evaluation.
Art 21.6 if during the review of the evidence submitted is found that the inconsistencies were removed, the approval is carried out in accordance with para. 2 and 3.	☐	☐	N/A. Just RNG software evaluation.
Art 21.7 in case of failing to fulfill the obligation under para. 4 from the part of the requester,	☐	☐	N/A. Just RNG software evaluation.

DECREE № 50 OF 15 FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE ON THE TERMS AND CONDITIONS FOR REGISTRATION AND IDENTIFICATION OF PARTICIPANTS, THE STORAGE OF DATA ON ORGANIZED ONLINE BETTING ON THE TERRITORY OF THE REPUBLIC OF BULGARIA AND THE SUBMISSION OF INFORMATION ABOUT GAMBLING TO A SERVER OF THE NATIONAL AGENCY FOR REVENUE	Results		
	OK	Fail	Observations
the executive director of the nra states a refusal to approve the automated delivery systems to the nra server. the requester is notified about the refusal under art. 27, para. 1 of the ga.			
Art 21.8 the refusal to approve the automated systems for submission of information to the nra server may be appealed under the administrative procedure code.	☐	☐	N/A. Just RNG software evaluation.
Art 22 in case of a change in the functionality of automated systems for submission of information to the nra server, the organizers shall submit a new request under art. 20, in which they should attach the updated documentation of the system and indicate the causes of the change.	☐	☐	N/A. Just RNG software evaluation.

DECREE NR.32 FROM 3RD FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE REGARDING THE GENERAL MANDATORY GAMING CONDITIONS AND RULES FOR THE TYPES OF GAMBLING FOR WHICH LICENSES ARE ISSUED	Results		
	OK	Fail	Observations
CHAPTER 4: GENERAL GAMING CONDITIONS AND RULES FOR ORGANIZING GAMES WITH BETTING ON RESULTS FROM SPORT COMPETITIONS AND RACING WITH HORSES AND DOGS			
Art 47.2 The organizer of games with online betting on results from sport competitions and racing with horses and dogs is obliged to publish on its web page the approval based	☐	☐	N/A. Just RNG software evaluation.

DECREE NR.32 FROM 3RD FEBRUARY 2021 ON THE ADOPTION OF AN ORDINANCE REGARDING THE GENERAL MANDATORY GAMING CONDITIONS AND RULES FOR THE TYPES OF GAMBLING FOR WHICH LICENSES ARE ISSUED	Results		
	OK	Fail	Observations
on Art. 17, para. 1, pt. 4 of the GA rules, as well as a message, containing the information based on Art. 10b of the GA.			
Art 48 Games with betting on results from sport competitions and racing with horses and dogs are held with bets and winnings only in bulgarian leva and euro.	☐	☐	N/A. Just RNG software evaluation.
Art 51.1 In the rules of sports betting, the operator must indicate: - conditions and type of participation	☐	☐	N/A. Just RNG software evaluation.
Art 51.2 - how the winnings are calculated and paid	☐	☐	N/A. Just RNG software evaluation.
Art 51.3 - how a jackpot is created and distributed (if there is a jackpot)	☐	☐	N/A. Just RNG software evaluation.
Art 51.4 - instructions for the players to submit a complaint	☐	☐	N/A. Just RNG software evaluation.
Art 52 Before issuing slips, tickets or other attendance signs for participation in games with betting on results from sport competitions and racing with horses and dogs, organized on the ground, the organizer shall submit to the executive director of the nra specimens for approval under art. 17, para. 1, pt. 5 of the ga.	☐	☐	N/A. Just RNG software evaluation.

4. ADDITIONAL INFORMATION/OBSERVATIONS.

N.A.

5. CONCLUSION.

According to the test Results¹ obtained from the testing performed and results obtained, BMM Spain Testlabs s.l.u. confirms that the item submitted under test conforms to all the relevant Bulgarian Technical Requirements described in the Scope section.

Yours sincerely,

Rubén Baptista

SVP Operations EURSAM

¹ The results included in this document refer exclusively to the sample tested, such as it is described in the corresponding section.

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