Alcohol and Gaming Commission of Ontario 90 Sheppard Avenue East Suite 200 Toronto ON M2N 0A4



# **Internet Gaming Notification Matrix**

Version 1.5

August, 2023

## **Table of Contents**

About this document
Purpose of this document
<b>Definitions</b>
Incident Notifications
Gaming Systems and Supplies, Integrity or Security 5
Monthly Gaming Systems and Supplies, Integrity or Security Report 5
Suspicious Behaviour, Cheating at Play, and Unlawful Activity 5
Money Laundering
Suspicious Sport and Event Wagering6
Suspicious Sport and Event Wagering: Other Jurisdictions 6
Incident Reports – Failures in Player Eligibility Control Mechanisms 6
Incident Reports – Non Compliance
Incident in Other Jurisdiction
Emergencies and/or site shut down
Use of Administrator Accounts
Non-Compliant Bet Offering

ul	atory Submissions	.8
	Operator Control Activities	8
	Technology Compliance Confirmation	8
	Reports and Meeting Minutes	8
	Results of FINTRAC Audit	8
	Officers, Directors and Partners	9
	Lists of Suppliers	9
	Annual Statement of Assurance	9
	Regulatory Data	9

## About this document

This document is maintained by the Technology Regulation and igaming Compliance Branch, Operations Division

Version	Date	Changes			
1.3 Oct 2022 • Added geolocation control failures to I3					
1.4	Apr 2023	<ul> <li>Clarified I1, I2A, Revised I2B description and timeframe, Added I2D, clarified S2C and S6 timeframe, clarified S5 description and S7 applicability</li> </ul>			
1.5	Aug 2023	■ Added I2E, clarified I4, clarified I6			

## Purpose of this document

The purpose of this document is to outline the internet gaming (igaming) information (i.e. incident notifications and regulatory submissions) that all registered gaming-related suppliers (GRSs) and internet gaming operators are required to provide to the Alcohol and Gaming Commission of Ontario (AGCO) and the frequency and format with which that information must be provided

These notification requirements do not supersede the Gaming Control Act, 1992, applicable Regulations, the Registrar's Standards for Internet Gaming, Terms of Registration, or any other AGCO requirements.

The minimum notification obligations listed herein are intended to complement ongoing, open, and transparent communication between the operators, GRSs, and the AGCO. Consistent with the AGCO's standards-based approach to regulation, this document aims to outline the broad categories of information that is required to be provided to the AGCO instead of an exhaustive prescriptive list of notification scenarios. Registrants must use sound judgment and discretion to determine circumstances requiring notification.

For ease of reference, the minimum notification obligations outlined within this document are organized into two distinct categories:

**Incident Notifications:** notifications generated due to a relevant event or incident of regulatory interest.

**Regulatory Submissions:** periodic data submissions or reports that are required for regulatory purposes.

If there are multiple categories into which a notification can be placed, use the more specific category and report it once.

## **Definitions**

For the purposes of this Notification Matrix, the following are defined as:

Category: Type of situation which requires an incident notification or regulatory submission.

**Description:** Detailed description of the incident notification and/or regulatory submission requirements.

**Gaming-Related Supplier (GRS):** A person who manufactures, provides, installs, tests, maintains or repairs gaming equipment or who provides consulting or similar services directly related to the playing of a lottery scheme or the operation of a gaming site.

**Incident Notification**: An event that may be a regulatory compliance concern.

**IIM**: Independent integrity monitor registered with the AGCO to monitor integrity of sports and event betting.

ITL: Independent Test Laboratory registered with the AGCO to certify internet gaming equipment

**Mode of Contact**: the medium for communicating the incident notification and/or regulatory submission to the AGCO.

**iAGCO**: The web-based service delivery application used by operators and GRSs for all manual notification submissions (e.g. immediate incident notifications and manual report submissions).

**AGCO SFTP Data Exchange (igaming):** AGCO Secure File Transfer Protocol (SFTP) server used for delivery of regulatory data received with periodic cadence (e.g. monthly data reports) which can include resultant action and follow up to incident notifications submitted in iAGCO.

**Notice Timeframe:** The required timeframe for submitting incident notifications and/or regulatory submissions to the AGCO.

**Immediate:** Submission must be made as soon as the situation is identified within reason and without delay. If all details are not immediately submitted (not available), provide a subsequent update once they are.

24 Hours: Within 24 hours of the situation being identified.

5 Business Days: Within 5 business days of the situation being identified.

**Prior to Implementation:** Within a reasonable timeframe relative to the scope and nature of the notification being submitted to provide the AGCO reasonable time to review the details of the notification in advance of implementation.

**Operator**: A person who operates a gaming site.

**OPP:** Ontario Provincial Police.

**Ref #**: Unique reference number when referring to the type of incident notification or regulatory submission item.

**Reference**: The Standard, section of the Gaming Control Act, 1992, Term of Registration, or other AGCO requirement for which the incident notification or regulatory submission is based.

Regulatory Submission: Products, information, documentation, or data required by the Registrar

**Contact TRCB**: Contact the AGCOTechnology Regulation & igaming Compliance Branch at <a href="mailto:igamingCompliance@agco.ca">igamingCompliance@agco.ca</a> with questions or inquiries related to the internet gaming notification matrix.

## **Incident Notifications**

REF#	CATEGORY	APPLIES TO	REFERENCE	DESCRIPTION	NOTICE TIMEFRAME	MODE OF CONTACT
I1	Gaming-Rela	Operator — Internet Gaming	Registrar's Standards for Internet Gaming:	Problems with the integrity or security of the gaming system, gaming supplies, and/or sensitive data that involve specifically:	Immediate	iAGCO
		Gaming-Related Suppliers (GRS) –	Standard 1.13, Requirement 1	Any gaming system fault which has resulted in under or overpayments to a player.		
		GRS —	Standard 4.09, Requirement 2	Data breach of sensitive data (e.g. personal information, financial data, etc). Please indicate the type of breach and the data and/or information system impacted		
		Manufacturers		Security issues impacting game integrity		
		iGaming Ontario (iGO) (optional)		Note: Notification should only be provided for problems that pertain to integrity or security of gaming systems, gaming supplies, and/or sensitive data where a standard is violated.		
I2A	Suspicious Behaviour, Cheating at Play, and	Operator — Internet Gaming	Registrar's Standards for Internet Gaming:	Any gaming or non-gaming related suspicious behaviour, cheating at play and/or unlawful activities, excluding money laundering.	Immediate	iAGCO
	Unlawful Activity (exlcuding money	GRS – Other	Standard 4.19,	Including but not limited to:		
	laundering)	GRS – Requirement 4  Manufacturers Standard 6.01,  iGO (optional) Requirement 4	-	Any incident of intentional cheating		
			Any incident of theft: (e.g. identify theft, unauthorized access to funds, abuse of bonusing, etc.)			
				<ul> <li>Any incident where an operator identifies suspicious betting activity (excluding sport and event wagering)</li> </ul>		
				Any other incident of unlawful activities		
				Note: All personal and private information must be excluded from submission.		
I2B	Money Laundering – Exclusion /Trespass	Operator – Internet Gaming, iGO	Registrar's Standards for Internet Gaming: Standard 6.03	List of patrons that have been the subject of any interviews, trespasses, exclusions, bans or limitations as a result of a money laundering risk assessment.	Monthly	OPP: iGaming Investigations Unit- Email
						(Notifications.iGaming. IEB@opp.ca
I2C	Money Laundering - FINTRAC	iGO	Registrar's Standards for Internet Gaming:	Notifications by iGO of Suspicious Transaction Reports filed with FINTRAC by all igaming operators and iGO in the preceding month (monthly batch notification).	Monthly	OPP: Secure File Transfer Protocol (SFTP)
			Standard 6.02,			to OPP
			Requirement 1			AGCO: AGCO SharePoint File Exchange (igaming)

#### **Incident Notifications**

REF#	CATEGORY	APPLIES TO	REFERENCE	DESCRIPTION	NOTICE TIMEFRAME	MODE OF CONTACT
I2D	Suspicious Sport and Event Wagering	Operator – Internet Gaming GRS – Other (including IIMs) iGO (optional)	Registrar's Standards for Internet Gaming: Standard 4.32	<ul> <li>Any incident where an independent integrity monitor identifies suspicious betting activity in Ontario or related to an event taking place in Ontario.</li> <li>Any incident where an operator identifies suspicious betting activity on its Ontario site.</li> <li>Note: All personal and private information must be excluded from submission.</li> </ul>	Immediate	iAGCO
I2E	Suspicious Sport and Event Wagering: Other Jurisdictions	GRS – Other (specifically IIMs)	Registrar's Standards for Internet Gaming: Standard 4.32	A summary report of all suspicious betting alerts disseminated to members in all jurisdictions,	Bi-Weekly	Email: iGamingCompliance@ agco.ca AND Notifications.iGaming. IEB@opp.ca
13	Incident Reports – Failures in Player Eligibility Control Mechanisms	Operator — Internet Gaming iGO (optional)	Registrar's Standards for Internet Gaming: Standard 2.14 Standard 3.01 Standard 3.02	Any incident where player eligibility control mechanisms fail including but not limited to:  1. Failures of self-exclusion control mechanisms  2. Failures of geolocation mechanisms  3. Failures of other KYC (Know Your Customer) control mechanisms	Immediate	iAGCO
14	Incident Reports – Non Compliance	Operator — Internet Gaming GRS — Other (including ITLs) GRS — Manufacturers iGO (optional)	Registrar's Standards for Internet Gaming: Standard 1.13, Requirement 2	A summary of all incidents of non-compliance with the law (within Ontario), including the Registrar's Standards for Internet Gaming, or any outstanding claim or lawsuit based in whole or in part on fraud, deceit, misrepresentation, breach of trust and similar conduct, including any actions taken to correct the cause of non-compliance.  Note: This applies to the registrants complete organizational structure (e.g. incidents involving affiliates, parents, subsidiaries, etc.).	Monthly	iAGCO
15	Incident in Other Jurisdiction	Operator — Internet Gaming GRS — Other (including ITLs) GRS — Manufacturers iGO (optional)	Terms of Registration	Regulatory, criminal, or other disciplinary action, taken in other jurisdictions. Includes matters with respect to corporate officers and directors. Also includes ongoing investigations.  Note: This applies to the registrants complete organizational structure (e.g. incidents involving affiliates, parents, subsidiaries, etc).	5 Business days	iAGCO

REF#	CATEGORY	APPLIESTO	REFERENCE	DESCRIPTION	NOTICE TIMEFRAME	MODE OF CONTACT
16	Emergencies and/or site shut down	Operator— Internet Gaming	Registrar's Standards for Internet Gaming:	Any incident that results in an <b>unplanned</b> closure of an internet gaming site.	Immediate	iAGCO
		iGO (optional)	Standard 1.13, Requirement 1			
17	Use of Administrator Accounts	Operator — Internet Gaming	Registrar's Standards for Internet Gaming:	Inappropriate use of administrator accounts.	Monthly	iAGCO
		GRS — Other	Standard 5.48			
		GRS — Manufacturers				
		iGO (optional)				
18	Non-Compliant Bet Offering	Operator — Internet Gaming	Registrar's Standards for Internet Gaming:	Offered sports or event bet is non-compliant.	Immediate	iAGCO
		GRS — Other	Standard 4.34			
		GRS — Manufacturers				
		iGO (optional)				

# Regulatory Submissions

REF#	CATEGORY	APPLIESTO	REFERENCE	DESCRIPTION	NOTICETIMEFRAME	MODE OF CONTACT
S1A	Operator Control Activities	Operator – Internet Gaming	Registrar's Standards for Internet Gaming: Standard 1.02	Formal Control Activity Matrix (CAM) outlining control activities and substantial changes to the control environment.	Prior to implementation of changes (The initial independently audited CAM will be submitted per "Internet Gaming Operator Application Guide" timelines)	iAGCO
S1B	Technology Compliance Confirmation	Operator – Internet Gaming GRS – Manufacturers	Internet Gaming Go-Live Compliance Guide	Confirmation from CEO (or equivalent) and Chief Compliance Officer (or equivalent) confirming the technology used to provide products and services in Ontario's igaming market is compliant with all related Standards.	Prior to implementation of substantial changes as well as annually  For the purposes of this item, a substantial change is one that involves either a new gaming integration or a change to a technology control used to meet a regulatory standard.	iAGCO
S2A	Reports and Meeting Minutes	Operator — Internet Gaming	Registrar's Standards for Internet Gaming:	Internal audit reports pertaining to operations in Ontario released in the past 3 months, if any.	Quarterly	iAGCO
S2B		GRS — Other (as requested, including ITLs)	Standard 1.02, Requirement 1 Standard 1.10	External reports — Reports from external auditors and/or consultants on internal control assessments, due diligence, and other regulatory compliance reviews pertaining to operations in Ontario.	Within 30 days of issuance	
S2C		GRS —  Manufacturers (as requested)  Standard 1.10  Standard 1.10  Standard 1.11, Requirement 2  Standard 1.13, Requirement 3	Financial Statements — Audited financial statements and auditor's report.	On Request		
S2D			Standard 1.13,	Meeting minutes — minutes from all Board of Directors meetings, audit committee meetings, and compliance committee meetings pertaining to operations in Ontario, that have taken place in the past 3 months, if any.	Quarterly	
S3	Results of FINTRAC Audit	Operator — Internet Gaming	Registrar's Standards for Internet Gaming: Standard 6.02 Requirement 1	Results of FINTRAC audit	The month following receipt of the audit report	iAGCO

### Regulatory Submissions

REF#	CATEGORY	APPLIES TO	REFERENCE	DESCRIPTION	NOTICETIMEFRAME	MODE OF CONTACT
S4A	Officers, Directors and Partners	Operator — Internet Gaming	Registrar's Standards for Internet Gaming:	Criminal charges, convictions or civil actions related to the integrity of individual.	5 Business Days	iAGCO
S4B	GRS — Other (including ITLs)		Standard 1.01, Requirement 1	Any change in the officers or directors (board members) of the corporation or any change in the membership of the partnership.	-	iAGCO Amendment job (Corporate Structure)
		GRS —	Terms of Registration			
		Manufacturers iGO	Gaming Control Act, 1992: s. 4 (3).			
S5	Lists of Suppliers	Operator — Internet Gaming	Registrar's Standards for Internet Gaming:	An up-to-date list of suppliers that will support the operation of gaming site(s) in Ontario. This may include suppliers within the entity's corporate	Quarterly	iAGCO
			Standard 1.20	structure as well as third party suppliers including but not limited to marketing affiliates.		
S6	Annual Statement of Operator — Assurance Internet Gamine	· •	Registrar's Standards for Internet Gaming:	A form of self-assessment whereby the Registrant assesses and confirms their compliance with the Registrar's Standards for internet	Annually (from go-live date)	iAGCO
		internet daming	Standard 1.13, Requirement 3	gaming, focusing on areas of particular interest as identified by the AGCO, and identifies continuous improvement priorities and actions.	uatej	
			noquii omoni o	Note: download the Assessment Form via the AGCO SharePoint File Exchange (igaming)		
S7	Regulatory Data  Operator — Internet Gaming  GRS – Other (specifically ITLs and IIMs)  iGO	·	Registrar's Standards for Internet Gaming:	Regulatory data that will be received with a periodic cadence (e.g. monthly, quarterly) as specified by the "AGCO Data and Reporting	Per "AGCO Data and Reporting	AGCO SFTP Data Exchange (igaming)
			Standard 1.13	Templates (igaming)".	Templates (igaming)"	
		' '	Standard 4.08		documentation	
		Standard 4.09				
			Standard 1.15			
			Standard 4.32, Requirement 8			