

From: Compliance <compliance@themill.io>
Sent on: den 26 juni 2026 15:35:31
To: Registrator <Registrator@spelinspektionen.se>
CC: Technical Compliance <technical.compliance@themill.io>; Ulisses Gagliano <ulisses.gagliano@themill.io>; Robert Bowell <robert.bowell@themill.io>
Subject: Comments on the proposal
Attachments: Comments on the proposal The Mill Adventure Ltd..docx (29.39 KB)

Categories: Annika

Dear all,

On behalf of the Mill Adventure Limited (with register number: [23Si1749](#)), we hereby submit our questions regarding the proposed draft regulation on the new technical requirements published for public consultation.

Please see the attached word file.

Kind regards,



Compliance Department

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On behalf of: The Mill Adventure Limited

The register number: [23Si1749](#)

To The Swedish Gambling Authority

June 26, 2026

Re: [Reference: Proposal for new regulations on technical requirements](#)

Question 1:

Based on Chapter 8, Section 2 stipulates that the gaming system shall have a function to generate **reports** regarding a player's **gaming behavior**.

Although, the draft regulation is establishing definition of gaming behavior, in particular:

“a player’s gaming patterns, such as the **frequency** and **volume** of **deposits and stakes**, engagement with gaming, stake levels and reactions to wins and losses, as well as behaviour in related interactions with the licence holder.”

From an operational perspective, the requirement remains vague. As the system will need to undergo certification and testing, it is important to understand what exactly is expected to be generated in such reports. In particular, how are these reports expected to be structured, what information relating to the player should be included, and what specific data is required to be captured? Without this level of specification, it will be very difficult to comply with the reporting requirement.

Question 2:

Regarding Chapter 9, section 9 establishes that if a player does not choose limits (daily, weekly, monthly) then system needs to have a function that blocks the player who has not set deposit limits.

Could you please clarify, what exactly is meant by the term “**function that blocks player**”. For example, does it mean restricting gaming services and prohibiting deposits? Or something else, like as an actual RG block or anything similar?

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THE MILL ADVENTURE