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To: Registrator <Registrator@spelinspektionen.se>
Subject: 25Si946- Kaizen Gaming response to technical requirements consultation
Attachments: 260713_SE consultation on technical requirements_Kaizen Gaming.docx (24.98 KB)

Good afternoon,

[Kaizen Gaming](#), currently a license applicant in the Swedish market, is a global leader in i-gaming, providing premium entertainment experience to its customers across 20 international markets.

We welcome the opportunity to provide input on the ongoing public consultation on proposed new regulations on technical requirements for gambling operations.

Please find our response in the attachment.

Best regards,

Vasiliki

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Being mindful of potential time zone differences, there is no expectation for you to respond outside your regular working hours. Your time and attention are greatly appreciated, and I look forward to hearing from you at a time that's convenient for you.

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Response to the SE consultation on technical requirements and the accreditation of bodies responsible for inspecting, testing and certifying gambling operations

1. Introduction

[Kaizen Gaming](#), currently a license applicant in the Swedish market, is a global leader in i-gaming, providing premium entertainment experience to its customers across 20 international markets. We aim to continuously improve our products and services to provide the best and most trusted online gaming experience for our customers. [Betano](#), our leading online sports betting and gaming brand, has an established presence across Europe, the Americas and Africa.

2. Comments

Kaizen Gaming welcomes the regulator's efforts on providing guidance and consolidating prior instruments into a single unified regulation on technical requirements and accreditation. We would like to provide comments on the following sections of the document:

- **8 Chapter: Information that a gaming system must be able to generate:**

1 § Reports concerning suspected gambling fraud offences as referred to in Chapter

19, Section 4 of the Gambling Act (2018:1138) must be capable of being generated

within the gaming system or manually.

Reports on suspected gambling fraud, unauthorized collusion between players, attempts at gambling fraud and unauthorized collusion between players, as well as

other recorded breaches of the terms of use and rules of the game, must be capable of being generated within the gaming system or manually.

Reports on undue influence on the outcome of a game that is the subject of betting

must be capable of being generated within the gaming system or manually.

2 § The gaming system must have a function to generate reports on a player's gaming behavior, relating to deviations or changes in a player's gaming habits and

patterns that give rise to responsible gaming measures.

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Kaizen comments:

- We would like to request more clarity on the aspects of player behavior that are required by the regulator. Complying with legal requirements, Kaizen Gaming uses our own templates, however, a more practical approach with specific examples would facilitate information exchange and compliance.
- **9 Chapter: Operational requirements for the license holder in relation to players:**

Player registration and access to the gaming system

1 § The gaming system must have a function for registering a player. Verification of the player's eligibility shall be carried out through reliable electronic identification, using a personal and unique access code.

Kaizen comments:

- Here we would like to understand the expectations/ requirements for “*reliable electronic identification*”: biometric and/or verification through bank ID?

Limits on deposits, losses and login time

9 § For online gambling, there must be a function whereby the player can easily specify the maximum deposit amounts that may be made, broken down by day, week and month.

There must be a function that blocks a player who has not set deposit limits in accordance with the first paragraph. A player who has not set deposit limits in accordance with the first paragraph may not play.

Kaizen comments:

- IFS 2022:3 required a deposit limit function but did not block players who had not set one. The new draft explicitly states that a player who has not set deposit limits may not play: the system must block them. We would like to seek further clarifications regarding which type of limits this requirement refers to. Would it

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refer to one at least or all deposit limits available (daily + weekly + monthly)?
Furthermore, we would welcome clarifications with regards to the definition of “blocking”: Would an absolute block with no access to play and no access to deposits be required?

- **15 Chapter: Functionality requirements for online gambling**

3 § A player’s participation in a game and the choices the player makes within the gaming system are voluntary.

A player must be given reasonable time to consider the consequences of a choice. Repeated selections made by a player within the gaming system must not be queued for execution.

Kaizen comments:

- We would like to see further clarifications on what is considered as “*reasonable time*” by the regulator.