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Sent on:	den 5 augusti 2026 15:02:07
To:	Registrator <Registrator@spelinspektionen.se>
CC:	SHERIFF Michael <michael.sheriff@docaposte.fr>
Subject:	Consultation response - proposed technical requirements - Ref. 25Si946
Attachments:	DOCAPOSTE Sweden_Consultation_Response_Gaming_Vault_25Si946.docx (149.37 KB)
Categories:	Kathrin

Dear Sir or Madam,
Please find attached Docaposte's response to the consultation on the proposed regulations concerning technical requirements and the accreditation of bodies responsible for inspection, testing and certification of gambling operations (reference 25Si946).
Docaposte supports the consolidation and modernisation of the framework. Our response recommends that the regulations expressly recognise a technology-neutral, certified regulatory data repository ("Gaming Vault") as an optional means of demonstrating compliance with the existing requirements for traceability, unchanged storage, retention and supervisory control. We also propose an open technical profile and a proportionate pilot before any broader obligation is considered.
We would welcome the opportunity to provide technical input or participate in a stakeholder workshop or pilot.
Yours faithfully,

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CONSULTATION RESPONSE

Comments on the proposed regulations on technical requirements and accreditation of bodies responsible for inspection, testing and certification

Core recommendation: Recognise a technology-neutral, certified regulatory data repository (a "Gaming Vault") as an auditable means of satisfying the existing requirements for unchanged storage, real-time traceability, five-year retention and supervisory access. Develop an open technical design and data before considering any broader obligation.

Submitted by	Docaposte
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Consultation recipient	Swedish Gambling Authority (Spelinspektionen)

1. Executive summary

Docaposte welcomes the Swedish Gambling Authority's objective of consolidating and clarifying the technical framework. The proposed regulation already contains the essential building blocks of evidence-based supervision: comprehensive logging, real-time UTC recording, unchanged storage, five-year retention, system-change traceability and detailed reports. The missing element is an explicit, testable method for ensuring that the regulatory evidence remains complete, independently retrievable and tamper-evident even when the production system is unavailable or compromised.

2. Overall assessment of the proposal

2.1 Strengths that should be preserved

- Consolidation of overlapping rules into one framework should simplify maintenance, interpretation and future updates. The consequence analysis expressly identifies this as a principal objective.
- The proposal uses an outcome-based approach: access and security events must be logged; system changes monitored; systems backed up; data, events and logs kept unchanged and protected; all records made in real time using UTC.
- The reporting chapter covers player registration, accounts, balances, transactions, sessions, game events, system events, suspicious activity, player behaviour and game rounds.
- The framework links technical requirements to accredited inspection and annual recertification, while preserving previously valid certification until expiry.
- The Authority recognises cloud services, remote access and ongoing technological development, creating a suitable basis for technology-neutral supervisory data infrastructure.

2.2 The supervisory evidence gap

The current text requires data to exist and remain unchanged, but it does not define how the Authority or an accredited body can verify that: all required events reached the evidentiary store; no events were omitted, duplicated or reordered; the stored record corresponds to a specific source system and software version; corrections preserve the original record; and evidence can be accessed without depending on the availability or administrators of the live production platform.

A daily backup does not close this gap. Backup primarily supports recovery and availability. It can reproduce the same omission, corruption or unauthorised change present in the source system. A regulatory data repository has a different purpose: it creates a separately protected, verifiable evidence trail for supervision, certification, incident response and dispute resolution.

2.3 Why the consultation is the right opportunity

Chapter 4, Section 18 already requires registered data, events and logs to be retained under Chapter 16, Section 5 of the Gambling Act, kept unchanged and protected against unauthorised intrusion. Chapter 16, Section 5 requires at least five years' retention, while Chapter 16, Section 2 permits systems outside Sweden where the Authority can exercise satisfactory control through remote access or similar means. Recognising a certified repository therefore operationalises existing statutory outcomes rather than creating a new regulatory purpose.

The consequence analysis concludes that the consolidation itself should have limited cost and states that the Authority intends to follow technological development and evaluate the rules continuously. For that reason, our proposal separates an immediate optional recognition from any future mandatory use, which should follow a pilot and supplementary impact assessment.

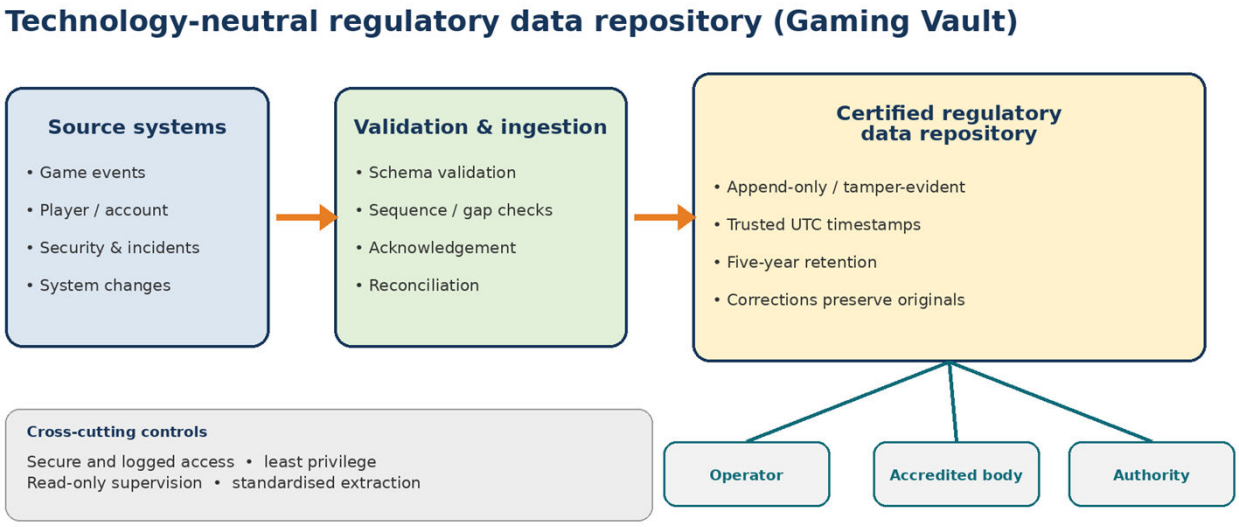

Figure 1 - Outcome-based architecture: the repository may be self-hosted or provided as a service, but the control objectives remain identical.

3. Proposed regulatory model

3.1 Definition and legal positioning

Recommended legal term: "regulatory data repository". The term "Gaming Vault" can be used in guidance to explain the market concept. The regulation should describe outcomes, not a product, supplier, storage technology or cloud platform.

Proposed definition for Chapter 1, Section 5: "Regulatory data repository" means a logically and operationally separated component or service that receives specified records from gambling and business systems, preserves the original records in append-only or otherwise tamper-evident form, supports verification of authenticity, integrity, completeness and time, and enables secure, logged and appropriately scoped access or extraction for the licence holder, the accredited body and the Swedish Gambling Authority.

3.2 Minimum control outcomes

Control outcome	Minimum expectation
Completeness	Unique event identifiers, source identifiers, sequence controls, acknowledgements, gap/duplicate detection and reconciliation to source and financial totals.
Integrity	Cryptographic hashes or signatures, protected key management, append-only or equivalent immutable storage, and periodic integrity verification.
Time	Source timestamp and repository receipt timestamp; synchronisation to UTC(SP) or another traceable UTC source; logging of drift, outages and delayed transmission.
Correction	No destructive editing. A correction is a new record linked to the original, with reason, actor, authorisation and timestamp.
Availability	Evidence remains retrievable independently of the live production environment, with tested continuity, recovery and export procedures.
Access	Role-based, least-privilege and read-only supervisory access or secure standardised export; all queries, exports and administration actions logged.

Control outcome	Minimum expectation
Confidentiality	Encryption in transit and at rest, data minimisation, pseudonymous identifiers where possible, and access limited to regulatory purpose.
Interoperability	Authority-published schemas, versioning, data dictionary, validation rules and non-proprietary export formats.
Accountability	The licence holder remains responsible for completeness and compliance, including where a third-party provider is used.

3.3 Scope and proportionality

- **Initial scope.** Online gambling systems and other connected systems containing information assets classified as highly relevant to integrity or traceability.
- **Lower-risk activities.** Existing exemptions and proportionality thresholds should remain. A summarised or periodic evidence profile may be sufficient for lower-risk land-based operations.
- **Hosting model.** The repository may be operated by the licence holder or a qualified third party and located wherever permitted by Chapter 16, Section 2 of the Gambling Act and applicable data-protection law, provided effective Swedish supervision is guaranteed.
- **No vendor lock-in.** The Authority should publish open functional and data requirements. Platform substitution and export of the complete evidentiary record must be possible.
- **No transfer of responsibility.** Outsourcing must not diminish the licence holder’s regulatory responsibility or the Authority’s powers.

4. Article-by-article recommendations

The following drafting is proposed in English for policy discussion. Swedish legal drafting and cross-references should be finalised by the Authority. The first four items constitute the minimum enabling package; the remaining items ensure that the repository produces reliable and usable evidence.

Provision	Suggested amendment / clarification	Purpose and market benefit
Chapter 1, Section 5 - Definitions	Add the definition of "regulatory data repository" set out in Section 3.1 of this response.	Creates a technology-neutral legal concept without selecting a supplier or architecture.
Chapter 2, Section 1 - ISO/IEC 27001 general guidance	Replace the blanket deeming language with: "Certification to ISO/IEC 27001:2022 may be used as evidence for relevant management-system and organisational controls in Chapters 4-6. It does not, by itself, demonstrate compliance with system-specific requirements concerning data capture, completeness, integrity, real-time recording, time reference, regulatory access, restoration or change traceability."	ISO/IEC 27001 demonstrates an information-security management system within a defined scope. It should not substitute for testing the actual gambling-data pipeline and evidence store.
Chapter 2 - New Section 2a on repository certification	"Where a regulatory data repository is used, inspection, testing and certification shall verify the source-to-field mapping; transmission and acknowledgement; detection of missing, duplicate and out-of-order records; integrity and time controls; access and extraction; retention and recovery; and reconciliation to the relevant source systems, accounts and financial totals. A reusable certification may cover the common platform, while each licence-holder integration shall be tested separately."	Reduces repeated cost while preserving assurance over operator-specific mappings and completeness.
Chapter 4, Section 18 - Storage of registered data, events and logs	Add general guidance: "An arrangement under this section may consist of a certified regulatory data repository operated by the licence holder or a third party, where specified data are copied continuously or without undue delay; original records cannot be overwritten; integrity and completeness can be verified; corrections are additive and traceable; access and administrative actions are logged; and the Authority can obtain secure read-only access or standardised extracts independently of the production system." Add that the Authority may require this or equivalent independent protection for assets classified as highly relevant to integrity or traceability.	This is the core enabling amendment. It recognises a vault without imposing immediate market-wide migration.
Chapter 4, Section 19 - Time reference	Add: "Each record shall include a unique event identifier, source-system identifier, source timestamp and, where transferred to a regulatory data repository, receipt timestamp. Clock synchronisation failures, material drift and transmission delays shall be recorded. Maximum permitted transfer delays may be specified by the Authority according to data category and risk."	Makes "real time" testable and permits proportionate latency profiles while preserving original event time.
Chapter 6, Section 6 - System changes	Add that the version-management record shall include the deployed artefact checksum, affected game/service/data-schema versions, approval, test or certification reference, implementation and rollback times, and the responsible decision-maker. For high-relevance assets, this evidence should be preserved in the regulatory data repository.	Allows the Authority to link a transaction to the exact certified software and configuration in force at that time.
Chapter 8 - New Section 15 on report reproducibility	"Reports under Sections 1-14 shall be reproducible from the underlying records and available in a documented machine-readable format. Each extract shall identify the reporting period, extraction time, filters, schema version, record count and reconciliation results. The Authority may issue schemas, validation rules and data dictionaries."	Transforms reports from operator-generated presentations into repeatable supervisory evidence and lowers ad hoc reporting burden.
Chapter 9, Sections 4-6 - Authentication and sessions	Clarify in guidance that the evidentiary record should include the result of reliable electronic identification (not the authentication secret), successful and failed login attempts, session identifier, login/logout time, automatic-logout trigger and reason, and security notifications.	Supports player disputes, account-takeover investigations and responsible-gambling supervision while applying data minimisation.

Provision	Suggested amendment / clarification	Purpose and market benefit
Chapter 10, Section 2 - Return-to-player monitoring	Add that the stored audit data shall identify the game and version, calculation period, total stakes, total winnings, relevant exclusions or adjustments, and calculation result, and shall be reconcilable to underlying game events.	Enables the Authority and accredited body to reproduce the calculation rather than merely inspect a reported figure.
Chapter 12 - New Section on fraud and abnormal gambling evidence	Require retention of the alert or case identifier, rule/model version or checksum, linked event references, detection time, review decision, action and outcome. Clarify that proprietary source code need not be stored, provided the applied version is uniquely identifiable and auditable.	Creates an evidence trail for anti-fraud, match-fixing and responsible-gambling interventions without unnecessarily exposing trade secrets.
Chapter 16 - Connected value machines	Where proportionate and technically connected, preserve machine access, software/configuration changes, meter or transaction data, errors and reconciliation data in the central system and regulatory repository. Use a lighter data profile for lower-risk machines.	Extends consistent supervision across the unified framework while respecting the different risk and volume profile of land-based equipment.

5. Benefits for the Swedish ecosystem

For the Authority

- Faster and more reliable access to complete, standardised evidence without operational dependence on the live platform.
- Risk-based analytics across operators, games and time periods, subject to lawful purpose and access controls.
- Better ability to verify player protection, fraud controls, balances, RTP, incidents and software changes.
- Continuity of supervision during cyber incidents, outages, insolvency, migration or provider disputes.
- A clearer basis for enforcement because integrity, completeness and extraction steps are themselves auditable.

For licence holders

- One structured evidence layer for certification, regulatory requests, player disputes and incident investigation.
- Fewer bespoke data pulls from production systems and less risk that supervisory access affects service availability.
- Reusable integration and data controls across jurisdictions, reducing duplicated compliance engineering.
- Earlier detection of missing or inconsistent data through automated reconciliation and alerts.
- Clearer expectations and reduced uncertainty over what “unchanged”, “real time” and “available for inspection” require.

For accredited bodies

- Repeatable test cases and machine-verifiable evidence rather than screenshots or manually prepared samples.
- Ability to certify a common repository platform once and focus operator-specific work on mapping, scope and completeness.
- Improved traceability between certified software versions and the transactions produced by those versions.

For players and the market

- Faster reconstruction of disputed transactions and account balances.
- Stronger evidence of whether limits, self-exclusion, authentication and automatic logout were correctly applied.
- Greater trust that gaming outcomes, payments and interventions are transparent and independently verifiable.
- More effective prevention and investigation of fraud, collusion, manipulation and cyber incidents.

6. Practical supervisory use cases

1. Player dispute or balance discrepancy. The Authority or operator reconstructs the chronological chain of deposits, stakes, outcomes, winnings, withdrawals and balance changes from immutable event records. Sequence and reconciliation controls show whether an event is missing or duplicated.

2. Responsible-gambling intervention. The evidence links behavioural indicators, limit changes, self-exclusion checks, communications, operator decisions and subsequent play. This allows supervision of both the intervention and its timing without relying solely on a narrative case file.

3. Suspected fraud, collusion or match manipulation. Investigators obtain the relevant game and account events, alert identifiers, rule/model version and actions taken. The record preserves what the system knew and when it knew it.

4. Cyber incident or platform outage. The separately protected repository retains an evidentiary trail even if production logs are unavailable, modified or encrypted by an attacker. It is not a replacement for recovery backup; it is independent regulatory evidence.

5. Return-to-player review. The accredited body or Authority reproduces RTP calculations from stored stakes and winnings, linked to the exact game version and calculation period.

6. Software or configuration change. A transaction can be linked to the approved artefact checksum, configuration, deployment time, certification reference and rollback history, reducing ambiguity about which version generated the event.

7. Connected machine inspection. Time-stamped access, configuration changes, errors, meter data and settlement records are correlated, enabling remote or targeted on-site inspection.

7. European regulatory precedents and lessons

Several European regimes already use a regulatory data repository or equivalent control. These examples should not be copied mechanically; they demonstrate that continuous transfer, tamper evidence and supervisory access are established and technically feasible regulatory patterns.

Jurisdiction	Established mechanism	Lesson for Sweden
Denmark	The Danish Gambling Authority requires online operators to give it access to a data warehouse (SAFE), to which gambling data are continuously transferred and saved using the Tamper Token security system.	Continuous transfer and cryptographic integrity can be integrated into licensing and certification. [5]
Germany	The GGL states that online sports betting, casino, poker and virtual slot operators must operate a Safe-Server capturing all data necessary for gambling supervision and enabling electronic control at any time.	A repository can be defined by supervisory outcome rather than by a specific product. [6]
Spain	The DGOJ describes an internal control system that captures and records gaming operations and economic transactions, includes a data warehouse and allows inspection staff to connect when necessary.	A structured capture-and-store model supports both routine and targeted inspection. [7]
France	French rules require real-time archiving and permanent authority access through a capture component and secure vault, with detectable alteration and operator accountability. A 2025 enforcement decision concerning omitted and defective records shows that a vault must include completeness checks, reconciliation, monitoring and clear operator responsibility; storage technology alone is not sufficient.	Sweden should adopt the strengths of the model while explicitly addressing data-quality and completeness controls. [8]

9. Requested outcome

Docaposte respectfully requests that the Swedish Gambling Authority:

1. Add a technology-neutral definition of a regulatory data repository to Chapter 1.
2. Add general guidance under Chapter 4, Section 18 recognising a certified repository "Gaming Vault" as an acceptable means of meeting unchanged-storage, protection and auditability requirements.
3. Introduce requirements for report reproducibility, reconciliation, additive correction and traceability to software versions.

"A certified Gaming Vault does not replace the operator's gambling system, the Authority's judgement or accredited certification. It makes the evidence produced by those systems complete, verifiable, independently retrievable and usable for modern supervision."