

# Q: Gambling service providers (online)

Fields marked with \* are mandatory.

## Consultation on data points to assess the inherent risk of the non-financial sector

---

### Objective of the consultation

AMLA would like to receive feedback on provisions of the draft guidelines under Article 40(2) of Directive (EU) 2024/1640 ('AMLD') and in particular on the specific questions set out below.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- contain a clear rationale;
- provide evidence to support the views expressed/ rationale proposed;
- and describe any alternative regulatory choices AMLA should consider.

Such comments should be sent by **27 September 2026, 23:59 (CET)**.

### Personal data protection

The protection of individuals with regard to the processing of personal data by the AMLA is based on Regulation (EU) 2018/1725. Further information on the processing of the personal data is available in the Data Protection Notice.

All legal details can be found in our Specific Privacy Statement (SPS).

### How to provide feedback

All the fields marked with an asterisk (\*) are mandatory.

We are using a survey format to help us analyse feedback effectively and efficiently. For this reason, document uploads are not enabled for this exercise, and we kindly invite you to share your comments directly within the survey.

Please do not provide any sensitive or personal information in your responses, as all answers will be published.

Please note that by submitting your contribution, you acknowledge that it will be published on AMLA's website. All contributions will be published after the consultation closes, unless you request otherwise. If you wish your comments to be treated as confidential, please clearly indicate this in the consultation form. The name of organisations submitting their contribution will also always be published. The name of the natural person providing a contribution will be published unless they object to said publication. Please refrain from inserting further personal information beyond what we ask from you. In particular, please refrain from providing confidential information or special categories of personal data (that is "personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation"). Your email address will never be published.

Before publication, AMLA staff will perform a limited screening of all contributions provided for the sole purpose of filtering any inappropriate submissions. After this, the replies are made available to the public directly on AMLA's public consultations page.

Please note that your contribution may be subject to a request for access to documents under Regulation 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

A confidential response may be requested from us in accordance with Regulation 1049/2001 regarding public access to European Parliament, Council and Commission documents. We may consult you if we receive such a request. Any decision not to disclose a response is subject to review by the European Ombudsman.

### **Language disclaimer**

AMLA welcomes submissions in all official EU languages. You can change the displayed language of this public consultation using the language selector in the top right corner of the EU Survey platform. Please note that all language versions other than English have been produced using machine translation and may contain inaccuracies. When in doubt, please refer to the English version.

Should you encounter issues with submitting your responses, please contact us by email at [public consultations@amla.europa.eu](mailto:public consultations@amla.europa.eu) no later than 48 hours before the deadline of the consultation period.

## **Providers of gambling services (online)**

---

This survey seeks feedback on the list of data points set out in Annex I of the draft RTS, which specifies the data points to be collected for the assessment of the inherent ML/TF risk exposure of obliged entities. Obligated entities should complete all questionnaires that are relevant to the activities and services they carry out or offer. Where an obliged entity performs activities or provides services falling under more than one category of obliged entities, it should provide responses for each relevant category and corresponding set of data points in

the relevant survey. This will help ensure that the final RTS reflect the practical availability, clarity, relevance and proportionality of the proposed reporting requirements across the different categories of obliged entities in the non-financial sector.

## Respondent profile

---

- \* The contribution is made by:

An organisation

- \* First name of individual (individual respondent or representative of organisation)

100 character(s) maximum

Eva Sjöberg

- \* Surname of individual (individual respondent or representative of organisation)

100 character(s) maximum

Spelbranschens Riksorganisation/Swedish Gambling Association

- \* Email (note that your email address will not be published)

100 character(s) maximum

eva.sjoberg@sper.se

- \* Publication of your name and surname:

- ☐ I agree to the publication of my name and surname (note that your email address will never be published).
- ☒ Contribution to be published without my name and surname (note that your email address will never be published).

- \* Would you like the comments you provide in this questionnaire to be treated as confidential?

- ☐ Yes
- ☒ No

- \* Which of the following best describes your organisation?

- ☐ Obligated entity (OE) (in the sense of Article 3 of [Regulation \(EU\) 2024/1624 Regulation - EU - 2024/1624 - EN - EUR-Lex](#))
- ☐ Competent Authority (in the sense of Article 2 (1) (44) of [Regulation \(EU\) 2024/1624 Regulation - EU - 2024/1624 - EN - EUR-Lex](#))
- ☐ Self-Regulatory Body (in the sense of Article 2 (1) (47) of [Regulation \(EU\) 2024/1624 Regulation - EU - 2024/1624 - EN - EUR-Lex](#))
- ☒ Industry Association
- ☐ Civil Society Organisation / NGO
- ☐ Other (please specify)

\* Please select the country from which you or your organisation carry out your main activities:

SE – Sweden

## Feedback on data points

---

**Data point 1:** Does the obliged entity have a complex structure?

**Legal references and draft definitions**

*This data point is only applicable to obliged entities that are legal entities.*

*Complex structure refers to ownership structures where there are three or more layers between the obliged entity and the beneficial owner and, in addition, more than one of the following conditions is met:*

- (a) there is a legal arrangement or a similar legal entity such as a foundation in any of the layers;*
- (b) the obliged entity and any legal entities present at any of these layers are registered in jurisdictions outside the EU;*
- (c) there are nominees involved in the structure;*

*A nominee is to be interpreted as a natural person or a legal entity instructed by a nominator (a different legal entity or natural person) to act as a shareholder or director in a legal entity on its behalf.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 2:** Does the entity have beneficial owners resident in high-risk third countries?

**Legal references and draft definitions**

*This data point is only applicable to obliged entities that are legal entities.*

*Report if the obliged entity's Beneficial Owners (BOs) include at least one individual that is resident in a high-risk third country, as of the end of the reference year. "High-risk third country" includes non-EU /EEA jurisdictions with strategic deficiencies, or with compliance weaknesses in their national AML/CFT regimes, or posing a specific and serious threat to the Union's financial system, according to Articles 29, 30 and 31 of the AMLR and/or are featured in the FATF list of jurisdictions for which a call for action is issued and the FATF list of jurisdictions under increased monitoring, as of the end of the reference year. The definition of the beneficial owner is contained in Article 2(1)(28) of the AMLR and, more in particular, Articles 51 to 55 of the same Regulation and, in the case of express trusts and other similar legal entities or legal arrangements, also Articles 57 to 60.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 3:** Does the obliged entity have Politically Exposed Persons (PEPs) as beneficial owners?

**Legal references and draft definitions**

*Report if the obliged entity's Beneficial Owners (BOs) include at least one politically exposed person (PEP), a family member of a PEP, or a person known to be a close associate of a PEP, as of end of the reference year.*

*The definition of politically exposed person (PEP), a family member of a PEP, or a person known to be a close associate of a PEP is provided in Article 2(34), 2(35) and 2(36) of AMLR.*

*The definition of the beneficial owner is contained in Article 2(1)(28) of the AMLR and, more in particular, Articles 51 to 55 of the same Regulation and, in the case of express trusts and other similar legal entities or legal arrangements, also Articles 57 to 60.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 4:** Is the parent undertaking located in high-risk third country?

**Legal references and draft definitions**

*Report if the obliged entity has a parent undertaking that is physically located and/or incorporated in a high-risk third country, as of the end of the reference year.*

*"Parent undertaking" is to be interpreted according to the definition provided in Article 2(1)(42) of the AMLR.*

*"High-risk third country" includes non-EU/EEA jurisdictions with strategic deficiencies, or with compliance weaknesses in their national AML/CFT regimes, or posing a specific and serious threat to the Union's financial system, according to Articles 29, 30 and 31 of the AMLR and/or are featured in the FATF list of jurisdictions for which a call for action is issued and the FATF list of jurisdictions under increased monitoring, as of the end of the reference year.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 5:** Total number of customers

**Legal references and draft definitions**

*Report the total number of active customers during the reference year.*

*Active customers are those who performed at least one transaction with the obliged entity in the reference year. Transaction refers to deposits, withdrawals and money wagered as defined in data points 8, 15 and 16 and excludes any bonuses paid to customers.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 6:** Total number of new customers

**Legal references and draft definitions**

*Report the total number of customers that registered with the obliged entity for the first time during the reference year.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 7:** Total number of customers which are PEPs

**Legal references and draft definitions**

*Provide number of active customers that are politically exposed person (PEP), a family member of a PEP, or a person known to be a close associate of a PEP, as of end of the reference year.*

*Active customers are those who performed at least one transaction with the obliged entity in the reference year. Transactions refer to both financial transactions (that result for example in purchase of chips or tokens) and gambling transactions.*

*Definition of politically exposed person (PEP), a family member of a PEP, or a person known to be a close associate of a PEP is provided in Article 2(34), 2(35) and 2(36) of AMLR.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 8:** Total amount of money wagered (EUR)

**Legal references and draft definitions**

*Report the total value in EUR of bets placed by the customers during the reference year at the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☒ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

\* If not readily available, please explain the main challenges and, where possible, propose an alternative.

*500 character(s) maximum*

This data point is relevant for understanding the scale, materiality and exposure of an operator's activities. However, customer numbers, wagering volumes, deposits, withdrawals and product volumes should not alone be treated as indicators of ML/TF risk intensity. AMLA should clarify whether data are intended to measure scale or risk. Product-volume data should be assessed in the context of the relevant ML/TF risk mechanism and supported by ratios and context.

**Data point 9:** Online betting total amount of money wagered (EUR)

**Legal references and draft definitions**

*Report the total value in EUR of bets placed for online betting activities during the reference year with the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

This data point is relevant for understanding the scale, materiality and exposure of an operator's activities. However, customer numbers, wagering volumes, deposits, withdrawals and product volumes should not alone be treated as indicators of ML/TF risk intensity. AMLA should clarify whether data are intended to measure scale or risk. Product-volume data should be assessed in the context of the relevant ML/TF risk mechanism and supported by ratios and context.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 10:** Online bingo total amount of money wagered (EUR)

**Legal references and draft definitions**

*Report the total value in EUR of bets placed for online bingo activities during the reference year with the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

This data point is relevant for understanding the scale, materiality and exposure of an operator's activities. However, customer numbers, wagering volumes, deposits, withdrawals and product volumes should not alone be treated as indicators of ML/TF risk intensity. AMLA should clarify whether data are intended to measure scale or risk. Product-volume data should be assessed in the context of the relevant ML/TF risk mechanism and supported by ratios and context.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☒ Not applicable (N/A)

**Data point 11:** Online lotteries total amount of money wagered (EUR)

**Legal references and draft definitions**

*Report the total value in EUR of bets placed for online lotteries activities during the reference year with the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

This data point is relevant for understanding the scale, materiality and exposure of an operator's activities. However, customer numbers, wagering volumes, deposits, withdrawals and product volumes should not alone be treated as indicators of ML/TF risk intensity. AMLA should clarify whether data are intended to measure scale or risk. Product-volume data should be assessed in the context of the relevant ML/TF risk mechanism and supported by ratios and context.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 12:** Online casinos total amount of money wagered (EUR)

**Legal references and draft definitions**

*Report the total value in EUR of bets placed for online casino activities during the reference year with the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

This data point is relevant for understanding the scale, materiality and exposure of an operator's activities. However, customer numbers, wagering volumes, deposits, withdrawals and product volumes should not alone be treated as indicators of ML/TF risk intensity. AMLA should clarify whether data are intended to measure scale or risk. Product-volume data should be assessed in the context of the relevant ML/TF risk mechanism and supported by ratios and context.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 13:** Online poker total amount of money wagered (EUR)

**Legal references and draft definitions**

*Report the total value in EUR of bets placed for online poker (outside of casinos) activities during the reference year with the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

This data point is relevant for understanding the scale, materiality and exposure of an operator's activities. However, customer numbers, wagering volumes, deposits, withdrawals and product volumes should not alone be treated as indicators of ML/TF risk intensity. AMLA should clarify whether data are intended to measure scale or risk. Product-volume data should be assessed in the context of the relevant ML/TF risk mechanism and supported by ratios and context.

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 14: Total deposits (EUR)****Legal references and draft definitions**

*Report the total value in EUR of "money in" for obliged entity during the reference year. Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available

- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 15:** Total withdrawals (EUR)

**Legal references and draft definitions**

*Report the total value in EUR of "money out" for obliged entity during the reference year.*

*Money out refers to the total amount paid back to the customers during the reference year, regardless of whether the customer later re-gambles those funds.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 16:** Total deposits number of transactions

**Legal references and draft definitions**

*Report the total number of "money in" transactions for obliged entity during the reference year.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 17:** Total withdrawals number of transactions

**Legal references and draft definitions**

*Report the total number of "money out" transactions for obliged entity during the reference year.*

*Money out refers to the total amount paid back to the customers during the reference year, regardless of whether the customer later re-gambles those funds.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 18:** Total deposits (EUR) by customers that are non-resident in your Member State

**Legal references and draft definitions**

*Report the total value in EUR of "money in" during the reference year by customers that are non-resident in the Member State where the obliged entity holds its license.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 19:** Total withdrawals (EUR) by customers that are non-resident in your Member State

**Legal references and draft definitions**

*Report the total value in EUR of "money out" during the reference year by customers that are non-resident in the Member State where the obliged entity holds its license.*

*Money out refers to the total amount paid back to the customers during the reference year, regardless of whether the customer later re-gambles those funds.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The data point is relevant for understanding the scale and materiality of an operator's activities. However, customer numbers, wagering volumes, deposits and withdrawals should not alone be treated as indicators of higher ML/TF risk. AMLA should clarify whether these data points are intended to measure exposure/scale or risk intensity. If used for risk assessment, ratios or contextual information may be needed to enable meaningful comparison between operators of different size.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 20:** Value (EUR) of the highest transaction

**Legal references and draft definitions**

*Report the value in EUR of a single highest "money in" transaction performed by a customer during the reference year.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The highest single transaction is an extreme value that may be driven by one customer or event and may therefore have limited value as a standalone indicator of inherent ML/TF risk. AMLA should clarify the intended role and risk direction of this data point. Distributional measures or information on transactions above relevant thresholds may provide a more robust indication of exposure.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 21:** Total value (EUR) of deposits using cards

**Legal references and draft definitions**

*Report the total value in EUR of "money in" performed by cards during the reference year. Cards include all different types of payment cards, i.e. credit cards, debit cards, virtual cards, any other card-based payment*

instrument.

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 22:** Total number of deposits using cards

**Legal references and draft definitions**

*Report the total number of "money in" transactions performed by cards during the reference year. Cards include all different types of payment cards, i.e. credit cards, debit cards, virtual cards, any other card-based payment instrument.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 23:** Total value (EUR) of withdrawals using cards

**Legal references and draft definitions**

*Report the total value in EUR of "money out" performed by cards during the reference year. Cards include all different types of payment cards, i.e. credit cards, debit cards, virtual cards, any other card-based payment instrument.*

*Money out refers to the total amount paid back to the customers during the reference year, regardless of whether the customer later re-gambles those funds.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 24:** Total number of withdrawals using cards

**Legal references and draft definitions**

*Report the total number of "money out" transactions performed by cards during the reference year. Cards include all different types of payment cards, i.e. credit cards, debit cards, virtual cards, any other card-based payment instrument.*

*Money out refers to the total amount paid back to the customers during the reference year, regardless of whether the customer later re-gambles those funds.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 25:** Total value (EUR) of cash deposits

**Legal references and draft definitions**

*Report the total value in EUR of "money in" during the reference year paid in cash.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity either directly or through a crypto asset service provider engaged by the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐

Yes

☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

Clarification is needed re reporting cash-related data in intermediary and retail distribution models. Operators may know the customer, transaction and amount involved, but not how the customer paid the intermediary. AMLA should clarify how such transactions should be classified and reported when the underlying payment method is not visible to the operator. Reporting should be based on reasonably observable information and should not imply greater precision than the data supports.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 26:** Total number of cash deposits

**Legal references and draft definitions**

*Report the total number of "money in" transactions paid in cash during the reference year.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

Clarification is needed re reporting cash-related data in intermediary and retail distribution models. Operators may know the customer, transaction and amount involved, but not how the customer paid the intermediary. AMLA should clarify how such transactions should be classified and reported when the underlying payment method is not visible to the operator. Reporting should be based on reasonably observable information and should not imply greater precision than the data supports.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 27:** Total value (EUR) of cash withdrawals

**Legal references and draft definitions**

*Report the total value in EUR of "money out" during the reference year paid in cash.*

*Money out refers to the total amount paid back to the customers during the reference year, regardless of whether the customer later re-gambles those funds.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

Clarification is needed re reporting cash-related data in intermediary and retail distribution models. Operators may know the customer, transaction and amount involved, but not how the customer paid the intermediary. AMLA should clarify how such transactions should be classified and reported when the underlying payment method is not visible to the operator. Reporting should be based on reasonably observable information and should not imply greater precision than the data supports.

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 28:** Total number of withdrawals using cash

**Legal references and draft definitions**

*Report the total number of "money out" transactions paid in cash during the reference year.*

*Money out refers to the total amount paid back to the customers during the reference year, regardless of whether the customer later re-gambles those funds.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

Clarification is needed re reporting cash-related data in intermediary and retail distribution models. Operators may know the customer, transaction and amount involved, but not how the customer paid the intermediary.

AMLA should clarify how such transactions should be classified and reported when the underlying payment method is not visible to the operator. Reporting should be based on reasonably observable information and should not imply greater precision than the data supports.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 29:** Total value (EUR) of incoming fund transfers

**Legal references and draft definitions**

*Report the total value in EUR of incoming funds transfers transactions during the reference year. Fund transfer means any electronic transaction through which monetary value is transferred by customers into or out of gambling operator's systems, including transfers conducted via banks, payment service providers, e-wallets, mobile payments, or other electronic payment methods. Card transactions are not to be reported within the fund transfer transactions.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 30:** Total number of incoming fund transfers

**Legal references and draft definitions**

*Report the total number of incoming fund transfer transactions during the reference year. Fund transfer means any electronic transaction through which monetary value is transferred by customers into or out of gambling operator's systems, including transfers conducted via banks, payment service providers, e-wallets, mobile payments, or other electronic payment methods. Card transactions are not to be reported within the fund transfer transactions.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 31:** Total value (EUR) of outgoing funds transfers

**Legal references and draft definitions**

*Report the total value in EUR of outgoing funds transfers transactions during the reference year. Fund transfer means any electronic transaction through which monetary value is transferred by customers into or out of gambling operator's systems, including transfers conducted via banks, payment service providers, e-wallets, mobile payments, or other electronic payment methods. Card transactions are not to be reported within the fund transfer transactions.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 32:** Total number of outgoing funds transfers

**Legal references and draft definitions**

*Report the total number of outgoing fund transfer transactions during the reference year. Fund transfer means any electronic transaction through which monetary value is transferred by customers into or out of gambling operator's systems, including transfers conducted via banks, payment service providers, e-wallets, mobile payments, or other electronic payment methods. Card transactions are not to be reported within the fund transfer transactions.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 33:** Total value (EUR) of crypto assets incoming transactions

**Legal references and draft definitions**

*Report the total value in EUR of "money in" performed in crypto assets during the reference year.*

*EUR equivalent refers to the exchange rate applied at the moment when the transaction happened.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity either directly or through a crypto asset service provider engaged by the obliged entity.*

*Crypto-asset means a crypto-asset as defined in Article 3(1), point (5), of Regulation (EU) 2023/1114 except when falling under the categories listed in Article 2(4) of that Regulation.*

*'Crypto-asset service provider' means a crypto-asset service provider as defined in Article 3(1), point (15), of Regulation (EU) 2023/1114 where performing one or more crypto-asset services.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☐ No

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 34:** Total number of crypto assets incoming transactions

**Legal references and draft definitions**

*Report the total number of "money in" performed in crypto assets during the reference year.*

*EUR equivalent refers to the exchange rate applied at the moment when the transaction happened.*

*Money in refers to the total amount paid by the customers to the gambling account held by the customer at the obliged entity for gambling activity either directly or through a crypto asset service provider engaged by the obliged entity.*

*Crypto-asset means a crypto-asset as defined in Article 3(1), point (5), of Regulation (EU) 2023/1114 except when falling under the categories listed in Article 2(4) of that Regulation.*

*'Crypto-asset service provider' means a crypto-asset service provider as defined in Article 3(1), point (15), of Regulation (EU) 2023/1114 where performing one or more crypto-asset services.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 35:** Total value (EUR) of crypto assets outgoing transactions

**Legal references and draft definitions**

*Report the total value in EUR of "money out" performed by crypto assets during the reference year.*

*EUR equivalent refers to the exchange rate applied at the moment when the transaction happened.*

*Money out refers to the total amount paid back to the customers during the reference year either directly or through a crypto asset service provider engaged by the obliged entity, regardless of whether the player later re-gambles those funds.*

*Crypto-asset means a crypto-asset as defined in Article 3(1), point (5), of Regulation (EU) 2023/1114 except when falling under the categories listed in Article 2(4) of that Regulation.*

*'Crypto-asset service provider' means a crypto-asset service provider as defined in Article 3(1), point (15), of Regulation (EU) 2023/1114 where performing one or more crypto-asset services.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 36:** Total number of crypto assets outgoing transactions

**Legal references and draft definitions**

*Report the total number of "money out" transactions performed by crypto assets.*

*Money out refers to the total amount paid back to the customers during the reference year either directly or through a crypto asset service provider engaged by the obliged entity, regardless of whether the player later re-gambles those funds.*

*Crypto-asset means a crypto-asset as defined in Article 3(1), point (5), of Regulation (EU) 2023/1114 except when falling under the categories listed in Article 2(4) of that Regulation.*

*'Crypto-asset service provider' means a crypto-asset service provider as defined in Article 3(1), point (15), of Regulation (EU) 2023/1114 where performing one or more crypto-asset services.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 37:** Total number of customers using crypto assets

**Legal references and draft definitions**

*Report the total number of active customers during the reference year that used crypto assets for deposits or withdrawals at the obliged entity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 38:** Total value (EUR) of deposits using prepaid vouchers

**Legal references and draft definitions**

*Report the total value in EUR of "money in" performed by pre-paid vouchers during the reference year.*

*Pre-paid vouchers are pre-funded physical or electronic instruments representing stored monetary value that may be used to fund, conduct, or redeem gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 39:** Total number of deposits using prepaid vouchers

**Legal references and draft definitions**

*Report the total number of "money in" transactions performed by pre-paid vouchers during the reference period.*

*Pre-paid vouchers are pre-funded physical or electronic instruments representing stored monetary value that may be used to fund, conduct, or redeem gambling activity.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 40:** Does the obliged entity offer pooled accounts?

**Legal references and draft definitions**

*Provide yes/no answer.*

*Pooled account is a customer account through which two or more individuals participate jointly in gambling activity, including the contribution of funds, shared betting strategies, or distribution of winnings.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The definition of "pooled account" should be clarified. Sper recommends distinguishing between: (i) jointly owned or controlled accounts, (ii) collective betting arrangements where customers retain separate accounts, and (iii) product-level pooling, such as pari-mutuel betting, where stakes are pooled but customers do not share accounts or control funds jointly. Clarifying which arrangements fall under Data Point 40 would improve comparability and support a more risk-based assessment.

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded

☐ Not applicable (N/A)

**Data point 41:** Total number of certificates of winnings issued

**Legal references and draft definitions**

*Report the total number of certificates of winning issued during the reference period.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☐ No

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 42:** Total number of customers that are non-resident in the obliged entity's Member State

**Legal references and draft definitions**

*Report total number of active customers that are not resident in the Member State where the obliged entity holds its license during the reference year.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☐ No

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 43:** Total number of customers that are resident in a high-risk third country

**Legal references and draft definitions**

*Report the total number of active customers during the reference year that are resident in high-risk third country.*

*"High-risk third country" would include non-EU/EEA jurisdictions that meet the criteria of Articles 29, 30 and 31 of the AMLR and the FATF lists of jurisdictions for which a call for action is issued and of jurisdictions under increased monitoring during the reference year.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 44:** Total number of customers that are resident in a non-EEA country

**Legal references and draft definitions**

*Report the total number of active customers during the reference year that are resident in non- EEA country.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 45:** Does the obliged entity allow deposits and/or withdrawals from high risk third countries?

**Legal references and draft definitions**

*"High-risk third country" would include non-EU/EEA jurisdictions that meet the criteria of Articles 29, 30 and 31 of the AMLR and the FATF lists of jurisdictions for which a call for action is issued and of jurisdictions under increased monitoring during the reference year.*

Is this data point clearly formulated and understandable?

- ☐ Yes
- ☐ No

Is the requested information available to you?

- ☐ Yes, readily available
- ☐ Yes, but only with manual adjustments or additional processing
- ☐ No, the information is not routinely collected or recorded
- ☐ Not applicable (N/A)

**Data point 46:** Does the obliged entity use any land-based intermediaries/agents?

**Legal references and draft definitions**

*Land-based intermediaries/agents are individuals or entities that facilitate or conduct gambling activity on behalf of customers, including the collection of funds and placement of bets.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

*500 character(s) maximum*

The use of intermediaries and retail distribution networks is relevant supervisory information. However, their existence alone should not be treated as evidence of higher ML/TF risk. The risk impact depends on the intermediary's actual role, including customer identification, handling of funds, visibility of payment information, applied controls and ongoing monitoring. These data points should primarily be treated as business model and exposure indicators.

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 47:** Number of customers for which the obliged entity relied on customer due diligence performed by other obliged entities

**Legal references and draft definitions**

*Report total number of active customers during the reference year for which the obliged entity relied on customer due diligence performed by other obliged entities within the meaning of SECTION 6 Reliance on customer due diligence performed by other obliged entities of Regulation (EU) 2024/1624.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☐ No

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

**Data point 48:** Does the obliged entity use distribution networks (kiosks, retailers, points of sale) which are not subject to AML/CFT requirements?

**Legal references and draft definitions**

*Distribution network refers to any natural or legal person, or physical establishment, acting for or on behalf of an obliged entity to facilitate customer-facing gambling-related activities in a land-based setting.*

Is this data point clearly formulated and understandable?

- ☐ Yes  
☒ No

\* If no, please explain which aspects are unclear and suggest possible improvements.

500 character(s) maximum

The use of intermediaries and retail distribution networks is relevant supervisory information. However, their existence alone should not be treated as evidence of higher ML/TF risk. The risk impact depends on the intermediary's actual role, including customer identification, handling of funds, visibility of payment information, applied controls and ongoing monitoring. These data points should primarily be treated as business model and exposure indicators.

Is the requested information available to you?

- ☐ Yes, readily available  
☐ Yes, but only with manual adjustments or additional processing  
☐ No, the information is not routinely collected or recorded  
☐ Not applicable (N/A)

## Contact

[Contact Form](#)