

Short Public Report

1. Name and version of the IT-based service:

ADMIRAL-Card-System, function as provided in August 2014

2. Provider of the IT-based service:

Company Name:

ADMIRAL

ADMIRAL Casinos & Entertainment AG (ACE)

Address:

Wiener Straße 158
2352 Gumpoldskirchen
Austria

Contact Person:

Emil Huber

3. Time frame of evaluation:

Mai 2013 – August 2014

4. EuroPriSe Experts who evaluated the IT-based service:

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5. Certification Body:

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Germany

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6. Specification of Target of Evaluation (ToE):

The target of evaluation does include:

- ADMIRAL-Card-System Services
 - Registration and creation of the customer (card)
 - Logging of times of attendance
 - Logging of stakes
 - Queries
 - Issuing and cancellation of prevention of access or prohibition of entry
 - Processing of log data
 - Credit screening
 - PEP-Check
- Interfaces of the ADMIRAL-Card-System
- Interface to the Federal Data Processing Center
- Interface/connections to the internet

The target of evaluation does not include:

- Other processes carried out by the data processing centre
- Third party networks (e.g. internet)
- ACE-Hotline
- Server housing at provider A1
- Video surveillance of the turnstiles
- Observation protocol

7. General description of the IT-based service:

The ADMIRAL Casinos & Entertainment AG (ACE) - a 100% subsidiary of the NOVOMATIC AG - operates entertainment casinos in several locations in Austria. In consequence of fundamental amendments of the Österreichisches Glücksspielgesetz (federal law) and relevant federal state laws, there are higher requirements with reference to protective actions against compulsive gambling. ACE has therefore developed the new ADMIRAL-Card-System, based on the NOVOCARDTM- Ampelsystem that was awarded the European Privacy Seal in 2011. Like its precursor,

the ADMIRAL-Card-System follows the research results of the Department for Addiction Research & Treatment of the Medical University/General Hospital Vienna. The ADMIRAL-Card-System is a computer-assisted system for data subjects, with procedures for access control and gaming addiction countermeasures.

Before entering an entertainment casino, each data subject has to prove his identity by submitting a photo ID. After verification of the data subject's legal age, his personal data is recorded by automatic readout of the photo ID as well as by manual input. The photo ID is scanned. In addition, an actual photo of the data subject is taken by means of a camera connected to the system. This photo is stored in the system and printed on the ADMIRAL-Card.

During registration a unique customer number is assigned to each data subject which allows explicit identification in the system. Moreover, the data subject chooses a four-digit PIN code. During the registration process the data subject declares his consent to the processing of his data under Data Protection Law as well as to the collection of his behaviour with regard to frequency of attendance (inclusive net gambling time) as well as possible credit screening. After registration the data subject receives his ADMIRAL-Card which is a combi-card with a smart-chip and a RFID-chip. Apart from the multi-digit customer number, no personal data is stored on the ADMIRAL-Card. The ADMIRAL-Card enables the data subject to open the turnstile directly in front of the gaming area and to operate the gambling machine in combination with his PIN-Code. The central storage of data and the networking of all subsidiaries allows control of gambling frequency and behaviour.

The ADMIRAL-Card is a step-by-step warning system for recognizing endangered data subjects. Basis for the status of a data subject is the monthly screening process based on continuous monitoring. Level GREEN signals uncritical, YELLOW potentially endangered, and RED equals no more access. The screening process differs with age groups, namely age-group 1 with data subjects from 18 - < 26 years and age-group 2 with data subjects ≥ 26 years. This differentiation has been fixed on the basis of scientific studies. The amount of net losses is considered, for age-group 1 a threshold value of EUR 500,00 and for age-group 2 a threshold value of EUR 1.000,00 has been set. This

calculation is carried out on the basis of net losses in the last three months. As an additional parameter, the number of days of attendance is considered, for age-group 1 a threshold value > 90 attendances and for age-group 2 a threshold of > 120 attendances per half year is set. When net losses achieve the relevant threshold value, a credit screening will be gathered. The data subject will be informed about the fact that a credit screening is carried out as well as about the result.

The potential danger of compulsive gambling of the data subject is simultaneously controlled on the basis of number of attendances. The screening process delivers information about the dangers to financial existence and of compulsive gambling of the data subject. Additionally, the data subject has the possibility to abandon admittance permanently or for a certain period on a voluntary basis.

The data collected and processed, such as ID, photo and gambling behaviour represent the minimum of data necessary for the obligatory identification, verification and protection against compulsive gambling. Data avoidance and minimisation fully comply to general data protection principles. Regarding the transparency of the ADMIRAL-Card-System, the leaflets “Entertainment mit Verantwortung” and “Prävention ist der beste Spielerschutz” placed in the entertainment casinos give information about the ADMIRAL-Card-System as well as advice regarding responsible gaming, self-test and contact addresses of therapeutic facilities. Because of the high probability of gambling addiction, in case of an access ban – whether imposed by the system or the data subject himself – both types of data are sensitive. Requirements for the explicit declaration of consent when processing sensitive data, as specified by the European Directive on Data Protection as well as the Austrian law on Data Protection, are met by the relevant declaration of consent given by the data subject. Furthermore, the data subject is informed by an authorized person in the entertainment casino that these data are sensitive and therefore particularly worthy of protection.

Referring to the legal retention period, it should be noted that according to the Austrian Glücksspielgesetz identity data has to be stored for 5 years, other than data concerning gambling behaviour. Erasure of personal data occurs either on demand of the data subject, in accordance with the legal retention period, or automatically after the end of

this period, provided that the data subject has not entered an entertainment casino within the past 5 years.

Hardware and software for authenticating the data subject's access to the gaming area has been delivered and developed by a third party provider who is also responsible for maintenance. The software necessary for the analysis of days and durations of attendance as well as gambling behaviour was also developed by a third party provider who is also responsible for maintenance. Server housing is carried out by the provider A1. ACE has concluded contracts regarding data protection principles with all third party providers. Regarding the automatic imposition of an access ban, the transparency of this automatic transition is secured by the leaflet-information as well as by a briefing given by the location manager.

8. Transnational issues:

The ADMIRAL-Card-System is used in Austria only. Transnational issues don't take place.

9. Tools used by the manufacturer of the IT product / provider of the IT-based service:

- Windows/Linux
- Apache/PHP
- Oracle DBMS
- Firebird DBMS

10. Edition of EuroPriSe Criteria used for the evaluation:

EuroPriSe criteria November 2011

11. Evaluation results:

Considering the fundamental aspects of processing, it can be stated that ACE with its ADMIRAL-Card-System has developed a system for preventing gaming addiction in full compliance with data protection regulations which considers modern scientific findings of addiction research better than the pre-system.

Evaluation of the criteria concerning processed personal data has shown that all processed data are precisely specified and that data processing happens only with the

explicit consent of the data subject. ACE complies fully with its information duty; effective processes have been implemented to honour the relevant rights of access, correction and erasure.

In the fundamental technical construction of the ADMIRAL-Card-System, data avoidance and minimization was given particular attention. Only data needed for data subject identification and gambling behaviour as well as for a possible ban on admittance is collected and processed.

Regarding transparency and product description, it was ascertained that on his first visit to an entertainment casino, the data subject is accurately informed about the fact that the ADMIRAL-Card-System is an electronic system, combining the obligation of registration with control of access and observation. In addition, two flyers placed in the entertainment casinos offer detailed information.

Legal basis for the processing of personal data is the amendment of the Österreichisches Glücksspielgesetz entered into force on January 1st 2011, as well as the relevant federal state laws.

Regarding the depth of intervention with respect to the fundamental right of data protection, it should be noted that the legal requirements concerning identity verification, gaming frequency verification as well as an immediate imposition of prohibition of entry can only be fulfilled by automatic data processing, centralised data storage and merging all locations in a network.

The processing of sensitive personal data is based on the explicit consent of the Data Subject.

Regarding the special requirements to the various phases of processing, it should be noted that especially internal data disclosure is secured by an effective authorization system.

ACE has implemented state-of-the-art technical measures regarding the prevention of data loss and unauthorized access to data, programs and devices of the ADMIRAL-Card-System.

These measures comprise

- redundancy of servers and data centers for operation of the ADMIRAL-Card-System;
- implementation of physical access control to data centers, servers and media of ACE;
- implementation of logical access control on operating system, database and application level;
- efficient change and patch management processes that keep devices of the ADMIRAL-Card-System up-to-date;
- implementation of a backup and recovery concept that guarantees quick recovery of data in emergency cases.

Regarding network security, ACE has implemented the following measures against external attacks and intrusion:

- redundant, powerful firewalls;
- state-of-the-art VPN encryption for securing communication between headquarter and branch offices;
- network segmentation by using VLAN technology for devices of the ADMIRAL-CARD-System.

ACE has implemented a certified information security management system according to the international standard ISO/IEC 27001. An information security policy that describes the aims of and responsibilities for information security has been developed.

Furthermore, ACE has also defined and implemented security processes (e.g. security incident management as well as test and release management) that point out the importance of data security regarding the ADMIRAL-Card-System.

Erasure of data after the cessation of the requirements happens in accordance with data protection regulations as well as requirements necessary for the ADMIRAL-Card-System and legal retention periods.

Compliance with general data protection principles and duties regarding purpose-specification and -limitation, proportionality and quality of data has been achieved perfectly.

Relevant service agreements have been concluded with both of the involved processors, in complete accordance with data protection regulations. Due to ACE's conscious refusal of remote maintenance access as well as the fact that external maintenance staff is only allowed to work under supervision of the ACE, access to personal data by staff members of the two processors can be almost completely excluded.

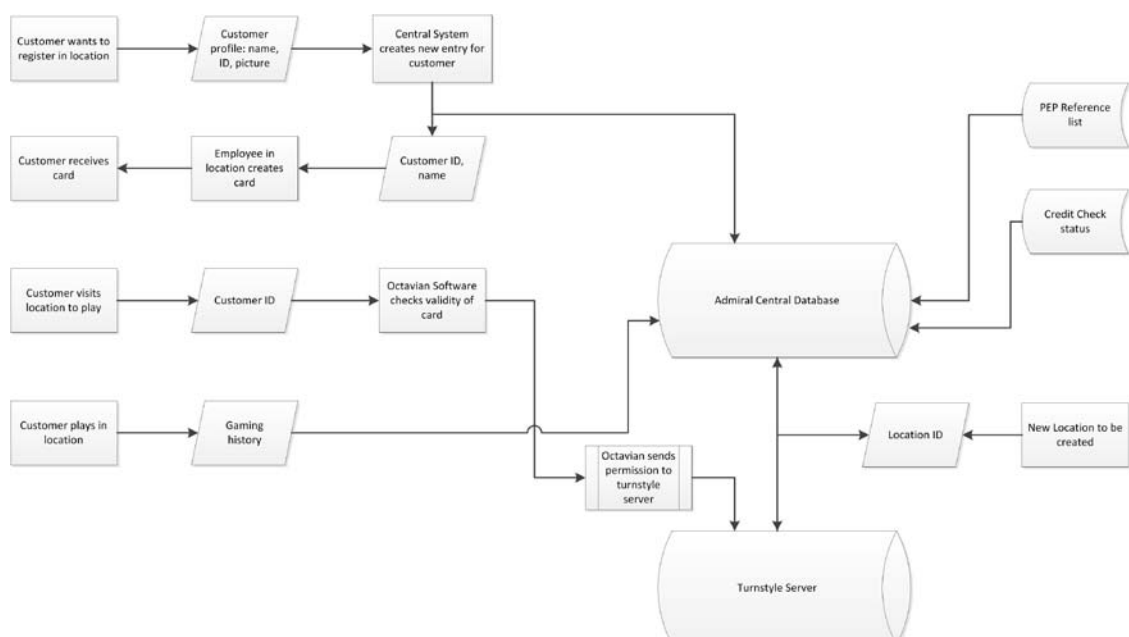
Transparency with regard to automated individual decisions concerning the behaviour of the Data Subject is fulfilled adequately by documentation and direct information given by staff present in the relevant entertainment-casino.

The ADMIRAL-Card-System has been reported to the Austrian Data Protection Commission and after prior checking registered in the Data Protection Register.

In summary, it can be said that ACE with its ADMIRAL-Card-System has developed a very innovative computer-assisted model to prevent gaming addiction which can be rated as compliant with the EuroPriSe criteria regarding privacy and data security.

12. Data flow:

Data flow in the ADMIRAL-Card-System can be gathered from the following diagram:



13. Privacy-enhancing functionalities:

In consequence of the amendment of the Österreichisches Glücksspielgesetz (federal law) as well as relevant federal state laws and subsequent new requirements referring to protective actions against compulsive gambling, the ACE has developed the ADMIRAL-Card-System based on experience gained during operating the NOVOCARD™-Ampelsystem which was awarded the European Privacy Seal. This system contains comprehensive actions to prevent gaming addiction. Due to automatic data processing as well as central storage of data and a network combining all entertainment casinos, the ADMIRAL-Card-System is an ideal solution regarding data avoidance and minimisation, data quality and protection of personal data against unauthorized access.

14. Issues demanding special user attention:

The ADMIRAL-Card is a smart card with a contactless chip. As unauthorized reading cannot be precluded, data subjects are recommended to protect the ADMIRAL-Card by using specific customary protective covers.

15. Compensation of weaknesses:

Not applicable.

16. Decision table on relevant requirements:

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Avoidance and Minimisation	<i>excellent</i>	The ADMIRAL-Card-System uses only a minimum of data.
Transparency	<i>adequate</i>	Leaflets in 6 different languages made available in the entertainment casinos not only describe the system in detail, but also inform about free and anonymous advisory services.
Technical-Organisational Measures	<i>adequate</i>	Regarding this criteria, physical and data access authorization systems have to be mentioned, as well as network security and backup and recovery procedures.

<i>EuroPriSe Requirement</i>	<i>Decision</i>	<i>Remarks</i>
Data Subjects' Rights	<i>excellent</i>	Data Subject information about the right of objection to processing and the right of access, correction and erasure when gathering personal data, is provided exemplarily.

Experts' Statement

We affirm that the above-named IT product has been evaluated according to the EuroPriSe Criteria, Rules and Principles and that the findings as described above are the result of this evaluation.

Vienna, 27.10.2014 Hans-Jürgen Pollirer



Place, Date

Name of Legal Expert

Signature of Legal Expert

Vienna, 27.10.2014 Jürgen Stöger

Place, Date

Name of Technical Expert

Signature of Technical Expert

Certification Result

The above-named IT product passed the EuroPriSe evaluation.

It is certified that the above-named IT product facilitates the use of that product in a way compliant with European regulations on privacy and data protection.

Place, Date

Name of Certification Body

Signature