



eCOGRA GENERALLY ACCEPTED PRACTICES (eGAP)

AFFILIATE PROGRAMS

Approved 22 May 2009

1 INTRODUCTION

The underlying philosophy of eCOGRA is based on the achievement of the objectives of player protection, fair gaming and responsible conduct by operators. Operators can opt to provide a similar level of comfort to affiliates that participate in the operator's affiliate program.

For purposes of this document an affiliate program is defined as *an Internet-based marketing service, that rewards the marketers (affiliates) for driving traffic (players) to the online gambling operators and for subsequent transactions made by players.*

Ultimately, this document aims to set out the most appropriate requirements to provide a high level of comfort to the affiliate that revenue is calculated accurately and deductions are correctly allocated, payments are completely and accurately processed, preventative and detective controls are in place to ensure accurate and correct linking of players to affiliates, and program software applications are developed, implemented, maintained and secured in a manner representative of best practice standards.

This document is intended primarily, as a guideline, to define and communicate the requirements to which potential eCOGRA affiliate program trust seal holders must comply. In addition, this document will be used as a guideline by the eCOGRA Compliance and Advisory Services Department, when conducting on-site and remote inspections of the operator's affiliate program.

The eCOGRA requirements are documented as Generally Accepted Practices (eGAP) and the following has been indicated for each of the eGAP areas:

- 1) The **objectives** outline the expected results of having adequately implemented the underlying requirements and practice guidelines.
- 2) **Methodology** describes the approach, timing and techniques adopted by the eCOGRA Compliance and Advisory Services Department, to obtain sufficient assurance that the seal holder adheres to the requirements and practice guidelines.
- 3) **Minimum requirements (R)** dictates the mandatory policies and procedures, which must be adhered to for the achievement of the eCOGRA affiliate program trust seal.
- 4) **Suggested practices (P)** define the practices that will contribute to a controlled environment but which are not necessarily required for the achievement of the eCOGRA affiliate program trust seal.

The requirements that may be applicable to software providers and operators have been indicated, within each eGAP area, as follows:

- 1) For **software providers** with a ✓ in the **SP** column.
- 2) For **operators** with a ✓ in the **O** column.

Where possible testing will be conducted remotely, however it may also be necessary to conduct certain tests at the software supplier and operator premises. Where necessary, additional testing will be performed should services be provided by third parties.

Recent changes to the eGAP requirements may not yet be operative at all programs as software suppliers and operators are provided with a period in which to implement updates which are reviewed at their next assessment date.

2 eCOGRA GENERALLY ACCEPTED PRACTICES

The Generally Accepted Practices of eCOGRA are documented below. The term practice is used in the widest sense – incorporating not just the computer systems, but also all the processes around it.

AFFILIATE TRUST

- 200 Payments to Affiliates and Affiliate Revenue Calculation
- 201 Affiliate Tracking Requirements
- 202 Affiliate System and Security Requirements
- 203 Disaster Recovery

200 PAYMENTS TO AFFILIATES AND AFFILIATE REVENUE CALCULATION

OBJECTIVE:

Affiliate revenue shall be calculated accurately and deductions correctly allocated. Payments shall be promptly attended to and shall be completely and accurately processed.

METHODOLOGY:

The eCOGRA Compliance and Advisory Services Department shall ensure acceptable financial process, information, technology and monitoring controls are in place, at a point-in-time and over a period-of-time, to meet this objective.

MINIMUM REQUIREMENTS:

<i>Payment to Affiliates</i>		<i>SP</i>	<i>O</i>
200.R.1	All payments to affiliates shall be paid out within a reasonable timeframe and in accordance with published payment terms and conditions.		√
200.R.2	All payments to affiliates shall be conducted through a formal documented process.		√
200.R.3	Terms and conditions applicable to calculation of affiliate revenue shall be clearly displayed on the operator's website.		√
200.R.4	Affiliate revenue calculation shall be conducted in accordance with published terms and conditions.	√	√
200.R.5	Player account and financial data relevant to affiliate revenue calculation shall be verified and correctly allocated in accordance with published terms and conditions.		√

<i>De-activated Player Accounts</i>		<i>SP</i>	<i>O</i>
200.R.6	Activation of player accounts previously de-activated by the operator shall be conducted through a formal documented procedure.		√
200.R.7	The terms and conditions shall state the operator's policy for calculating affiliate commission on player accounts previously de-activated.		√

<i>Affiliate Deductions</i>		<i>SP</i>	<i>O</i>
200.R.8	Affiliate deductions shall be calculated in accordance with published terms and conditions.	√	√
200.R.9	Deduction amounts relevant to affiliate revenue calculation shall be verified and correctly allocated in accordance with published terms and conditions.	√	√
200.R.10	Terms and conditions shall state the operator's policy for carrying over negative player account balances. Negative account balances relevant to affiliate revenue calculation shall be verified and correctly allocated in accordance with published terms and conditions.	√	√
200.R.11	Deduction amounts relevant to large wins shall be verified and correctly allocated in the winning month and in accordance with published terms and conditions.		√

<i>Affiliate Account Information</i>		<i>SP</i>	<i>O</i>
200.R.12	Affiliate account and payment related information shall be available electronically.	√	√
200.R.13	Changes to affiliate account information must be subject to strict security control and shall be maintained in a system audit log.	√	√

SUGGESTED PRACTICES:

None.

201 AFFILIATE TRACKING REQUIREMENTS

OBJECTIVE:

Preventative and detective controls shall be in place to ensure accurate and correct linking of players to affiliates.

METHODOLOGY:

The eCOGRA Compliance and Advisory Services Department shall ensure acceptable process, information, technology and monitoring controls are in place, over a period-of-time, to meet this objective.

MINIMUM REQUIREMENTS:

<i>Player Tracking to Affiliates</i>		<i>SP</i>	<i>O</i>
201.R.1	Appropriate controls must be in place to detect and prevent delinking of player accounts from affiliate accounts.	√	√
201.R.2	Manual adjustments to affiliate accounts shall be reviewed and authorised.		√
201.R.3	Manual adjustments on inactive player accounts linked to affiliates shall be affected in accordance with the operator’s policy on expiry of cookies.		√
201.R.4	All manual adjustment transactions must be subject to strict security control.	√	√

<i>Player Tracking Information</i>		<i>SP</i>	<i>O</i>
201.R.5	All information relating to tracking of information shall be logged and retained as far as reasonably possible.	√	√

SUGGESTED PRACTICES:

None.

202 AFFILIATE SYSTEM AND SECURITY REQUIREMENTS

OBJECTIVE:

Affiliate applications shall be developed, implemented, maintained and secured in a manner representative of best practice standards.

METHODOLOGY:

The eCOGRA Compliance and Advisory Services Department shall ensure that an acceptable software development process, information, technology and monitoring controls are in place, over a period-of-time, to meet this objective.

MINIMUM REQUIREMENTS:

<i>Software Development</i>		<i>SP</i>	<i>O</i>
202.R.1	All affiliate application development and implementation shall be conducted in accordance with a formal process.	√	
<i>Change Control</i>		<i>SP</i>	<i>O</i>
202.R.2	All changes to affiliate applications and player tracking software shall be conducted through a formal documented change control procedure and shall cater for: 202.R.2.1 Approval procedures for changes. 202.R.2.2 Emergency change procedures. 202.R.2.3 Procedures for testing and migration of changes. 202.R.2.4 Segregation of duties between developers, implementers and users. 202.R.2.5 Procedures to ensure that relevant documentation is updated as a result of a change.	√	
202.R.3	All documentation relevant to the development or enhancement of affiliate applications shall be retained.	√	
202.R.4	The test environment must be isolated physically and logically from the live operational systems.	√	
<i>Access Control</i>		<i>SP</i>	<i>O</i>
202.R.5	Appropriate access controls for end users shall be implemented on affiliate applications.	√	√
<i>Security Architecture</i>		<i>SP</i>	<i>O</i>
202.R.6	Security policies and procedures shall be documented, communicated and reviewed at least annually or in the event of material changes	√	√
202.R.7	Security policies and procedures shall be implemented. Risk-based internal and external security reviews shall be conducted at least annually or in the event of material changes.	√	√
<i>Virus Detection Software</i>		<i>SP</i>	<i>O</i>
202.R.8	Virus scanners and/or detection programs must be installed on all pertinent information systems. These programs shall be updated regularly to scan for new strains of viruses.	√	√

SUGGESTED PRACTICES:

None.

203 DISASTER RECOVERY

OBJECTIVE:

Affiliate programs shall be able to demonstrate that they can recover from a system disaster.

METHODOLOGY:

The eCOGRA Compliance and Advisory Services Department shall use appropriate disaster recovery and/or business continuity methodologies to confirm that this objective is met.

MINIMUM REQUIREMENTS:

<i>Backup of Information</i>		<i>SP</i>	<i>O</i>
110.R.1	Backup and recovery procedures shall be in place to ensure data and information (e.g. logs and financial information) are backed up on a regular basis and can be restored in the event of a disaster.	√	√
110.R.2	Critical data and information shall be backed-up and secured off-site on a daily basis.	√	√
110.R.3	Backup and disaster recovery responsibilities and procedures between software providers and operators shall be clearly defined.	√	

SUGGESTED PRACTICES:

None.