

# AGLC iGaming Guidance Document – Frequently Asked Questions (FAQs)

## General Inquiries

### Contact Information

#### **Who can we contact at Alberta iGaming Corporation AiGC?**

Please email AiGC at: [aigc.info@ABigaming.ca](mailto:aigc.info@ABigaming.ca)

#### **Who should operators contact if they have questions related to AML or FINTRAC processes?**

All inquiries related to Anti-Money Laundering (AML) and Financial Transactions and Reporting Analysis Centre of Canada (FINTRAC) processes should be directed to AIGC.

## Alberta Gaming, Liquor & Cannabis (AGLC) & Alberta iGaming Corporation (AiGC)

#### **What are the differences between AGLC and AiGC?**

AGLC will establish and uphold standards and requirements (AGLC's Standards and Requirements for Internet Gaming - SRIG) applicable to Alberta iGaming Corporation with respect to its activities and to all registered iGaming operators and suppliers.

AiGC will conduct and manage internet gaming offerings through private gaming operators in Alberta, in accordance with the Criminal Code (Canada), the *iGaming Act*, the Gaming, Liquor and Cannabis Regulation and the AGLC's Standards and Requirements for Internet Gaming.

AiGC will develop, execute and oversee operating agreements with private iGaming operators, as well as required policies, programs and procedures that balance key government objectives such as consumer protection, reduction of red tape and revenue generation.

Alberta's rollout optimized for integrity and player protection by separating operational and regulatory functions, establishing high standards, and ensuring smooth transitions from early onboarding to full regulation.

## **Application Inquiries**

### **Which fees must be paid up front, and when is the annual renewal date?**

Applicants must pay any applicable application fees and the full registration fee at the time of submission. The annual renewal date will be established based on either the official go-live date or the date the registration is issued, if the registration is granted after go-live.

### **Is there a deadline for application/licensing submissions?**

AGLC will accept applications when presented with interested applicants.

## **Social Responsibility**

### **What disclaimer language and responsible gaming number are required to be included in all marketing and advertising materials?**

This determination is at the discretion of the operator, provided the approach complies with Section 3 of the SRIG (including Section 3.3.6) and Schedule 1.1 of the [Gaming, Liquor and Cannabis Regulation](#). Please feel free to contact the iGaming Compliance branch if you would like any specific language reviewed in advance, although this is not required.

### **Are operators required to include a responsible gaming message when using logo-only advertising materials?**

Logos will not be considered on their own as advertising, depending on the context of how it's being used. Please reach out to iGaming Compliance for further information on specific cases.

### **Are loyalty and reward programs permitted to be advertised externally?**

Yes. External advertising of loyalty and reward programs is permitted, provided it complies with Schedule 1.1 of the Gaming, Liquor and Cannabis Regulation.

## **Centralized Self-Exclusion**

As part of the Government of Alberta's expansion of the iGaming market, AGLC will oversee a centralized self-exclusion system that can integrate with any iGaming site operating within the province. These changes support market integrity, compliance and the conduct of iGaming activities in a socially responsible manner.

## **What is the process?**

- The new online only process is more secure and enhances privacy for patrons while ensuring that any exclusions are applied consistently for all regulated gambling in Alberta patrons have opted into.
- To complete sign-up online, patrons will need to:
  - Enter their name as it appears on a valid form of government issued ID.
  - Fill out supplemental information (date of birth, height, weight, etc.).
  - Upload a portrait style (headshot/selfie) photo of themselves.
  - Agree to all terms & conditions.

The length of the program remains the same – Albertans can choose between six months and three-year intervals.

## **How is AGLC supporting the expansion of the self-exclusion program?**

AGLC is in the process of adding new self-exclusion staff members to assist with the expansion of the program. These will be dedicated self-exclusion representatives to ensure that all individuals are given the opportunity to manage their gambling in a responsible way.

## **How will operators be contacted regarding CSE integration?**

Upon receipt of all required application materials by AGLC's Due Diligence unit, and confirmation of payment of all applicable fees, AGLC IT will initiate contact to commence the onboarding process for CSE integration. Operators who have satisfied these requirements will receive further communication from AGLC Technical Support with next steps.

## **General Standards and Requirements**

### **Advertising and Promotions**

#### **Is the use of “Coming Soon” style pre-registration advertising permitted?**

Yes. “Coming Soon” advertising is permitted, provided it complies with Section 3.3.6 of the SRIG. Operators may also allow players to pre-register, as long as no bets are accepted before the go-live date and the operator is in a business relationship with AGLC. Please reach out to iGaming Compliance for further information or to confirm compliance.

### **Will advertising companies have to be registered?**

No, registered suppliers will be responsible for ensuring advertising is compliant with the Standards and Requirements for Internet Gaming (SRIG).

### **Are iGaming inducements allowed?**

Yes. iGaming inducements such as bonuses, promotions, or special offers for a player to gamble may be permitted when they appear on the operator's website or are sent directly to players who have provided express, informed consent to receive marketing materials. All inducements must be presented in a clear, accurate, and responsible manner. Please refer to Schedule 1.1 of the GLCR for additional information.

### **What about general advertising?**

Generic or broad-reach advertising that does not reference a specific inducement and simply directs players to the operator's website is not considered an inducement. However, all general advertising must include an appropriate social responsibility message, consistent with the SRIG.

## **Location Requirements**

### **Can geolocation-based address-proximity checks be used as part of the KYC process in Alberta?**

Geolocation proximity checks may be used as a *supplemental* KYC mechanism in Alberta. When a patron's address verification returns a minor discrepancy – such as a typo or slightly outdated information – a geolocation check that confirms the patron is physically located at or near their stated residential address may be considered a successful verification step.

It would be up to the registered operator to confirm an accurate address is updated to the patron's player account.

## **Player Accounts**

### **After submitting our application and remitting the required fees, are we permitted to begin registering patrons prior to the completion of KYC verification and the activation of the Centralized Self-Exclusion (CSE) program?**

Yes, you may begin preregistering patrons upon entering into a business relationship with AGLC (paid the fees and submitted application documents to Due Diligence). Once the Centralized Self-Exclusion (CSE) program becomes active, all previously registered patrons will be reviewed against the CSE database.

**Do Operators need to review a government-issued photo ID when a player registers for an account? (Updated 2025-05-15)**

No. Government-issued identification is not required to be viewed by the operator at account registration under Section 4.4.4 of the SRIG. A credit file or dual-process approach is also permitted under FINTRAC rules for identity verification.

It is recommended operators provide clear instructions to clients to enter their name exactly as it appears on their government issued identification under these alternate verification methods. This will assist in client file matching to avoid duplicate business relationships, and easily identify banned, legally excluded and self-excluded clients.

**Sports & Events Betting**

**Will AGLC allow daily fantasy sports?**

In Alberta and other regulated jurisdictions, fantasy sports are generally treated as part of iGaming because they involve wagering and elements of chance, despite including a skill component. As a result, fantasy sports offerings are typically subject to licensing, regulatory oversight, and compliance requirements similar to those that apply to poker and sports betting.

**Is election/political betting allowed in Alberta?**

Political/election betting events are not allowed in Alberta. See Section 4.6.5 p) of the SRIG.

**Can registered operators offer iBingo?**

iBingo offerings are not approved in the Alberta marketplace at this time.

**Can registered operators offer iLottery?**

Currently, Play Alberta is the only registered operator authorized to offer lottery on behalf of Western Canadian Lottery Corporation (WCLC). Please reach out to WCLC for further information.

## **Peer-to-Peer Games**

**Will Alberta permit players to participate in peer-to-peer games with players outside of Canada as a result of the Ontario Court of Appeal decision?**

AGLC is currently assessing the Ontario Court of Appeal decision within the context of Alberta’s legislative and regulatory framework. No determination has been made at this time regarding the permissibility of peer-to-peer games involving players located outside of Canada. Any future position will be based on a detailed evaluation of legal authority, regulatory oversight, operational controls, and player-protection requirements.

## **Game Design**

**Are the requirements outlined in Section 4.10.11 SRIG for slot games – specifically the requirement to display a customer’s net position in Canadian dollars – also applicable to instant games, even though the standards reference “slots” in several sections but not “instants”?**

Yes. Based on the analysis completed to date, instant games are expected to meet the same policy requirements outlined in Section 4.10.11 SRIG.

**Are visual game elements that appear to show progression – such as meters filling, glowing symbols, or items moving into a collection area – allowed in Alberta if they are purely for visual effect?**

These visual elements are acceptable if they are clearly disclosed to the player as being for visual effect only and do not imply increased odds of winning or actual progression. Clear in-game messaging explaining that the feature is visual only meets the intent of Alberta’s “misleading game information” standards.

## **Certification By Accredited Testing Facilities (ATFs)**

**What RNG certificates need to be provided to AGLC?**

Operators must provide distinct certifications for software-based RNGs and physical RNGs devices.

**Will AGLC accept game certifications from the Alcohol and Gaming Commission of Ontario (AGCO)?**

AGLC will accept AGCO certifications provided they correspond to what has been approved and implemented in Ontario, and the ATF issuing those certifications is fully registered in

Alberta. After 90 days of post market launch in Alberta, all game certifications will be required to be certified in Alberta and provided to iGaming Compliance.

### **Player Wallets**

**Will players be able to use the same e-wallet on betting websites in different provinces?**

No, distinct websites between provinces will require separate e-wallets.

### **Penetration Testing**

**Is penetration testing required prior to market launch, and does the requirement include both application-layer and network-layer testing?**

Yes, penetration testing is required before market launch and must be completed annually thereafter. In addition to application-layer testing, operators are also responsible for ensuring that their own network layer (both internal and external) is included within the scope of penetration testing.

### **Control Activity Matrix (CAM) Requirements**

**Is a CAM template available?**

Operators may use their own format, provided it fully captures the required standards and addresses each standard appropriately. An Alberta CAM template can be provided by iGaming Compliance if requested.

**When do operators have to submit a Control Activity Matrix (CAM) to AGLC?**

AGLC will assess risk during the registration process to determine CAM submission requirements. Operators new to regulated iGaming markets, without prior licences or with a history of non-compliance may need to submit a CAM before their go-live date. Operators who are already licensed or registered in other jurisdictions will generally have up to three months post go-live to submit. AGLC Compliance staff will confirm timelines in writing.

## **Information Technology and Security Requirements**

### **Architecture and Infrastructure**

### **Will data servers have to be located in Alberta for iGaming providers?**

AGLC does not require data to be stored in Canada for regulatory purposes. Although some cloud providers use Canadian data centres, data may still be processed outside the country. If data is stored or processed outside Canada, a review and approval process must be followed, and some countries may not be approved due to security or regulatory concerns.

### **Will data centres have to be registered?**

AGLC's Due Diligence unit will discuss registration with potential suppliers during their initial conversation.

## **Software Requirements**

### **Why is ISO 27001 certification and SOC 2 (Type 1 and Type 2) attestation required for operators?**

ISO 27001 or SOC 2 attestations are required for operators to demonstrate that they have appropriate information security, risk management, and third-party oversight controls in place. Currently, these attestations are not required from third-party goods and services suppliers supporting operators (for example, platform vendors), as those suppliers are managed through the operator's own governance and oversight processes.

Both ISO 27001 and SOC 2 include strong requirements for third-party risk management, meaning an operator cannot achieve or maintain certification without effective controls over its vendors. For this reason, requiring ISO 27001 or SOC 2 attestations at the operator level is considered sufficient to address third-party risk.

### **While it is known that Security is common criteria required for SOC 2 attestations, could AGLC please advise if the remaining four 'Optional' SOC 2 Type 1 Trust Services Criteria (TSC) are also required to be included?**

All required and optional criteria will need to be included with SOC 2 attestations.

### **What is the required timeframe for achieving compliance with the attestations and certifications outlined in the Standards and Requirements for Internet Gaming (SRIG)?**

A SOC 2 Type 1 attestation is required for market launch.

A SOC 2 Type 2 attestation or ISO 27001 certification must be obtained within two (2) years following the market launch date. If an operator can obtain SOC 2 Type 2 or ISO 27001

certification prior to market launch, the SOC 2 Type 1 attestation requirement will be waived.

**Are third-party platforms' independent SOC 2 or ISO 27001 reporting acceptable for addressing its responsibilities within the self-exclusion process?**

Currently, we do not have a requirement for third-party subservices to provide SOC 2 attestation or ISO 27001 certification.

**Will AGLC accept an Agreed Upon Procedures Report (AUP Report) to satisfy the SOC2 Type 1 attestation requirements?**

No. This report primarily addresses financial controls aligned with SOC 1 rather than SOC 2. As a result, it does not encompass the security-related criteria covered under SOC 2 Type 1, nor does it assess the effectiveness of those controls as required for SOC 2 Type 2.

**Do GSF 1, GSF 2, or GSF 5 qualify as acceptable equivalents to a SOC 2 Type 2 attestation under the revised policy?**

No. While policy allows alternatives to a SOC 2 Type 2 attestation where comparable assurance can be demonstrated, GSF 1, GSF 2, and GSF 5 do not meet that standard. These assessments are point-in-time reviews and do not provide independent attestation of control operating effectiveness over a defined period or standardized assurance aligned with the Trust Services Criteria. They may support broader risk assessments but do not offer assurance equivalent to a period-of-time attestation.

**Will AGLC accept an Ontario SOC 2 Type 1 attestation for use in Alberta?**

An Ontario SOC 2 Type 1 attestation may only be considered valid if the Alberta environment is demonstrably identical in scope, system architecture, controls, and operating model. This is because a SOC 2 Type 1 report provides assurance solely on the design of controls for the specific system assessed at a single point in time.

**Which firms can fulfil the AGLC SOC 2 requirements?**

Certification granting firms for SOC 2 (Type 1 and Type 2) must be independent CPA firms in good standing, licensed in a U.S. state or Canadian province, and subject to an American Institute of Certified Public Accountants (AICPA) peer review or an equivalent Canadian provincial practice inspection program. Please reach out to iGaming Compliance for further information if required.

**Under Section 5.5.16(b), which requires all third-party-developed code to pass integration testing before being moved to production, is an ATF required to perform this integration testing?**

Integration testing is required; however, it does not need to be performed by an ATF. Operators must ensure that all third-party code successfully completes integration testing before it is deployed to production.

---

Should you have any questions about this guidance, please contact iGaming Compliance at: [iGamingCompliance@aglc.ca](mailto:iGamingCompliance@aglc.ca).