



# **TENNESSEE SPORTS GAMING OPERATOR KYC PROCESS**

**I. SWC RULE 1350-01-.08(3)(a)**

1. List all Player-submitted data that is verified as an exact match per 1350-01-.08(3)(a).
2. Describe what Player data is submitted to your KYC vendor(s) and what information/results you get back from your KYC vendor(s)?
3. Based on information you get back from your KYC vendor(s), describe your process, workflow, and/or risk tolerance in determining whether to pass or fail a Player's KYC verification check?
4. What "risk level/score" provided by your third-party KYC providers do you classify as passing to verify a Player account and why?
5. If you receive information from multiple KYC vendors, how do you reconcile any inconsistencies or differences in that information?

**II. SWC RULE 1350-01-.08(3)(b)**

6. Describe what authentication methods(s) you use to satisfy the requirements listed in 1350-01-.08(3)(b).
7. If you use the knowledge-based questions method, does the length of time a new Player takes to answer a knowledge-based question during account creation impact the risk score associated with the new Player? If so, how does the length of time to answer the knowledge-based question impact the KYC authentication process?

**III. SWC RULE 1350-01-.08(3)(c)**

8. What is your step-by-step process for manual KYC verification checks on Player accounts?
9. If you use manual KYC processes to verify a Player's identity under 1350-01-.08(3)(c), provide a detailed explanation as to what processes and methodologies you use to do so, how you measure risk, and what metrics you use to pass or fail prospective Players.

**IV. UPDATES TO KYC INFORMATION**

10. What is your process for updating KYC information when a Player attempts to make changes to their account profile information? How do you authenticate the new PII?
11. When an account is closed due to inactivity and a Player then wants to log back into their account but finds their old account is closed, does the Player then need to create a new

account with fresh KYC or is the Player able to reopen their old account? How is KYC information verified in that process?

#### **V. FAILURES AND SUSPICIOUS INFORMATION**

12. What steps and documents are required when a Player fails the KYC process during account creation? How long do these additional steps take to authenticate the new Player?
13. What types of suspicious activity identified during account creation and the KYC process would generate a suspicious activity report to the SWC?
14. How do you use KYC processes to authenticate the identity of the holder of the payment method linked to digital wallets and mobile payment services (i.e. Apple Pay, Venmo, PayPal, etc.) when adding to new or existing accounts?
15. How do your KYC processes contribute to the authentication of the Player's identity when funds are deposited or withdrawn from Player's wallets?

#### **VI. GENERAL**

16. How do you ensure that your KYC procedures are compliant with the latest regulatory requirements?
17. How do you record KYC information for all Player accounts, including any notes of failures and investigations? Is it accessible in the back office, via Vendor, etc.?
18. Are there any items listed in 1350-01-.08(3) that you have found to be inconclusive in verifying the identity of a Player?

#### **VII. VENDORS**

19. List all Vendors you use in the KYC process and how long you've been working with each of them.
20. Describe in detail the role of each of those Vendors.
21. If you do any KYC verification in house, describe in detail that process.
22. Overall, set forth all of the workflows that comprise your KYC process and how those workflows satisfy the requirements of Rule 1350-01-.08(3).
23. Do you anticipate any vendor or procedural changes to your KYC process after licensure?

**VIII. MULTI-FACTOR AUTHENTICATION**

24. When a Player is locked out of their account from failed log-in attempts, what steps must a Player take to gain access back to their account?
25. How do you combine your KYC processes and MFA applications on your platform to better protect accounts from fraudulent activity?