Final Investigation Report – Buddybet Pty Ltd

Summary	
Entity	Buddybet Pty Ltd (Buddybet)
Australian Company Number	617 859 953
Relevant legislation	*Interactive Gambling Act 2001*
Type of activity	Part 7B – National Self-Exclusion Register
Findings	66 contraventions of subsection 61NC(9) [Not maintaining a connection to the NSER] No contraventions of subsection 61KA(3) [Provision of licensed interactive wagering services to registered individuals] 68 contraventions of subsection 61LA(4) [Sending regulated electronic messages to registered individuals – recklessness of provider] No contraventions of subsection 61LB(2) [Making a regulated telemarketing call to a registered individual] No contraventions of subsection 61LC(2) [Sending regulated direct marketing material to a registered individual] 2 contraventions of subsection 61MA(2) [Opening a wagering account for a registered individual] 3,589 contraventions of subsection 61MB(5) [Not closing a wagering account held by a registered individual – no outstanding bets] No contraventions of subsection 61MC(5) [Not closing a wagering account held by a registered individual – outstanding bets] 9 contraventions of subsection 61JP(5) [Failure to promote the NSER as required by subsection 25(3) of the *Interactive Gambling (National Self-exclusion Register) Register Rules 2022*.

Background

1. On 21 August 2023, BetStop - the National Self-exclusion Register™ (**NSER**) commenced operation. The NSER allows Australians to self-exclude from all interactive licensed wagering service providers (**IWPs**) in a single process. Given the serious consumer harm that could result from non-compliance with the NSER, the ACMA had informed IWPs that it expected their systems would be in place to enable full compliance from the commencement of the NSER's operations.

2. On 14 April 2024, the ACMA commenced an investigation into Buddybet's compliance with the *Interactive Gambling Act 2001* (IGA) following a self-report of non-compliance from Buddybet on 15 February 2024. In its letter of 15 February 2024, Buddybet conceded that its system did not connect to the NSER between 4 December 2023 and 8 February 2024 (**the failure period**). This system failure impacted Buddybet's ability to comply with its obligations under the IGA such that it was unable to determine

whether individuals were registered with the NSER (**registered individuals**) before opening new accounts, offering wagering services or sending regulated electronic messages.

3. Upon discovery of the system failure on 8 February 2024, Buddybet submitted that it re-established connection to the NSER and subsequently identified 125 customers as registered individuals. The ACMA's investigation focuses on the failure period and Buddybet's interactions with these 125 customers during that time, along with one additional matter as noted below in paragraph 6.

4. On 14 April 2024, under paragraph 173(b) of the *Broadcasting Services Act 1992*, the ACMA gave Buddybet a Notice requiring it to provide information pursuant to the investigation (the **Notice**).

5. Buddybet made 2 submissions to respond to the Notice:

   > 16 May 2024 (Submission 1)

   > 24 June 2024 (Submission 2).

6. After the commencement of the investigation, the ACMA also received a consumer complaint on 14 May 2024 about a separate matter. The complainant alleged that despite being a registered individual, they received an email from Buddybet on 14 May 2024 asking to verify their account to start accessing wagering services (**verification complaint**). The ACMA broadened the scope of its investigation to also consider whether the email which is the subject of the verification complaint complies with the IGA, and the findings are detailed in this report.

7. The ACMA's findings are based on:

   > Submissions 1 and 2

   > records extracted from the NSER by the ACMA which record when affected customers were registered individuals

   > publicly available technical information about the operation of push notifications, including information provided by Apple and Google as identified in this report

   > information provided in the verification complaint

   > Buddybet's submission of 5 December 2024 on the ACMA's preliminary findings.

8. In its submission of 5 December 2024, Buddybet informed the ACMA that:

   > it ceased trading on 22 October 2024 and all customer accounts have been closed

   > it has made a request to the Northern Territory Racing and Wagering Commission (NTRWC) to 'surrender its Northern Territory sports bookmaker and betting exchange licences'.

[redacted]

10. The reasons for the ACMA's findings, including the key elements which establish the contraventions are set out below.

Relevant legislative provisions

11. Obligations related to the NSER are set out in Part 7B of the IGA. The provisions relevant to this investigation are provided at **Attachment A** including, where necessary, references to the *Interactive Gambling (National Self-exclusion Register) Register Rules 2022* (Register Rules) and the *Telecommunications Act 1997*. Unless otherwise specified all references to provisions within legislation in the report are a reference to provisions within the IGA.

Reason for Findings

Finding 1 – Breach: Licensed interactive wagering service providers must maintain a connection to the NSER (subsection 61NC(9))

Regulatory obligation

12. In order to comply with their obligations under Part 7B, section 61NC provides that IWPs can request the Register operator to inform the provider whether one or more specified persons are registered individuals. Under subsection 61NC(6), an IWP must take all reasonable steps to ensure that they have a computer system and are continuously supplied with an internet carriage service so that they are able to always make such requests to the Register operator at any time of the day or night.

Is Buddybet a licensed interactive wagering service provider for the purposes of the IGA?

13. Buddybet was licensed by the NTRWC to provide licensed interactive wagering services in Australia at the time each matter under investigation occurred.[1] For this reason, Buddybet was included on the ACMA's Register of IWPs maintained under section 68 during the period subject to investigation.[2]

14. As such, Buddybet is an IWP for the purposes of the IGA, and the obligations under Part 7B apply.

Did Buddybet engage in conduct that contravenes subsection 61NC(6)?

15. Buddybet conceded (Submission 1) that it did not have a computer system that enabled it to make requests to the Register operator under subsection 61NC(1) during the failure period – a total of 66 days.

16. Submission 1 detailed that this error occurred because of a system update which misconfigured the connection of Buddybet's system to the NSER. Buddybet also submitted that:

    - the connection to the NSER was not tested post-release as NSER connectivity was not a 'customer-facing' function
    - its configuration error did not raise any errors or alerts, meaning that the issue persisted without being detected
    - the error was only detected after a review of a report by a staff member who had noticed that there had been a large gap since new registered individuals had been detected
    - following this review, the system failure was identified and rectified on 8 February 2024.

[1] A list of licensed providers is contained on the NTWRC's website: https://industry.nt.gov.au/boards-and-committees/racing-commission/sports-bookmakers-and-betting-exchange-operators
[2] This register is available on the ACMA's website: https://www.acma.gov.au/check-if-gambling-operator-legal

17. The ACMA has reviewed logs for the NSER and confirmed that Buddybet did not connect to the NSER between 16:45 AEDT 4 December 2023 and 16:50 AEDT on 8 February 2024.

18. The ACMA has found that Buddybet's configuration error during the failure period meant that it did not have a computer system that was capable of making requests to the Register operator under subsection 61NC(1) at any time of the day or night, as contemplated by subsection 61NC(6) of the IGA.

19. Further, the ACMA has found that Buddybet did not take all reasonable steps to ensure that it had the relevant systems in place as required by subsection 61NC(6) of the IGA, as:

    - the connection to the NSER was not tested by Buddybet as part of its release process or as part of any regular testing post-release as NSER connectivity was not a 'customer-facing' function.
    - Buddybet did not have any reporting or alerts to detect its failure to connect to the NSER to ensure that potential non-compliance with its obligations could be identified and remediated swiftly.

20. Subsection 61NC(9) of the IGA, which is a civil penalty provision, provides that an IWP must not contravene subsection 61NC(6). Subsection 61NC(10) of the IGA provides that a person who contravenes subsection (9) commits a separate contravention of that provision in respect of each day during which the contravention occurs.

21. The ACMA has found that Buddybet contravened subsection 61NC(9) on 66 occasions between 4 December 2023 and 8 February 2024 (a total of 66 days).

Finding 2 – No breach: Prohibition of the provision of licensed interactive wagering services to registered individuals (subsection 61KA(3))

Regulatory obligation

22. Subsection 61KA(3) of the IGA, which is a civil penalty provision, provides that an IWP must not provide a licensed interactive wagering service to a registered individual. A licensed interactive wagering service is defined by section 61GB of the IGA as noted in paragraph 14.

Did Buddybet provide licensed interactive wagering services to registered individuals?

23. The ACMA investigated whether Buddybet provided wagering services (i.e. were able to place a bet) to 125 customers within the scope of this investigation during the failure period.

24. In Submission 1, Buddybet stated that none of the relevant customers were provided with wagering services during the failure period. The ACMA has found no evidence that registered individuals were provided wagering services during the failure period.

Finding 3 – Breach: Regulated electronic message must not be sent to an electronic address of a registered individual – recklessness of provider (subsection 61LA(4))

Regulatory obligation

25. An IWP Subsection 61LA(4) of the IGA, which is a civil penalty provision, provides that an IWP must not send, or cause to be sent, a regulated electronic message to an electronic address if:

    a) the electronic address is an electronic address of a registered individual; and

    b) the person is reckless as to the fact that the electronic address is an electronic address of the registered individual.

26. A regulated electronic message is defined (section 61GF) as an electronic message where, having regard to:

    a) the content of the message; and

    b) the way in which the message is presented; and

    c) the content that can be located using the links, telephone numbers or contact information (if any) set out in the message;

    it would be concluded that the purpose, or one of the purposes, of the message is:

    d) to offer to provide licensed interactive wagering services; or

    e) to advertise or promote licensed interactive wagering services; or

    f) to advertise or promote a provider, or prospective provider, of licensed interactive wagering services.

<u>Did Buddybet send, or cause to be sent, electronic messages?</u>

27. In Submissions 1 and 2, Buddybet provided the ACMA with evidence, in the form of spreadsheets, that it sent 314 messages to the 125 customers during the failure period. Buddybet provided details of the messages it sent, including the date, time and content. These 314 messages comprised of 46 unique messages, with variability of the bonuses offered.

28. As noted in paragraph 6, after the commencement of the ACMA's investigation into Buddybet's system failure, the ACMA received the verification complaint. The ACMA subsequently broadened the scope of its investigation to include consideration of whether this email complies with the IGA.

29. The complainant provided the ACMA with a copy of the email received from Buddybet. The sender of the email is listed as 'BuddyBet <support@buddybet.com>' and the content of the message includes Buddybet imagery and references to Buddybet. On this basis, the ACMA found that Buddybet sent this email to the complainant.

30. The breakdown of these messages include:

    > 128 SMS messages

    > 179 emails (with 178 of these sent to customers impacted during the failure period)

    > 8 push notifications.

31. Section 61GE of the IGA defines an electronic message as a message sent:

    a) using:

        i) an internet carriage service; or

        ii) any other listed carriage services, and

    b) to an electronic address in connection with:

        i) an email account; or

        ii) an instant messaging account; or

        iii) a telephone account; or

        iv) a similar account.

    Note: Email addresses and telephone numbers are examples of electronic addresses.

SMS and email messages

32. SMS messages are messages sent using a listed carriage service, or an internet carriage service, to a telephone number in connection with a telephone account. The ACMA has found that the 128 SMS messages that were sent by Buddybet are electronic messages under subparagraphs 61GE(1)(a)(ii) and (b)(iii).

33. Email messages are messages sent using an internet carriage service to an email address in connection with an email account. The ACMA has found that the 178 email messages that were sent by Buddybet during the failure period, along with the customer verification email sent on 14 May 2024, are electronic messages under subparagraphs 61GE(1)(a)(i) and (b)(i).

Push notifications

34. Push notifications are a type of message sent to a software application (app) that has been downloaded on a device. In the context of this investigation, the ACMA looked at whether the 8 push notifications Buddybet sent to users of the Buddybet mobile app were electronic messages within the meaning of section 61GE. This assessment is detailed in **Attachment B**. It explains why the ACMA has found the push notifications sent by Buddybet were regulated electronic messages and subject to the marketing prohibitions under section 61LA (as discussed below).

35. On the basis of the assessment at Attachment B, the ACMA has found that the 8 push notifications that were sent by Buddybet were sent using an internet carriage service to an electronic address. This electronic address is a push token issued by Apple or Google, which is in connection with an Apple or Google account, being a similar account to an email, instant messaging or telephone account.

36. The ACMA has found that the 8 push notifications that were sent by Buddybet are electronic messages under subparagraphs 61GE(1)(a)(i) and (b)(iv).

<u>Were the messages regulated electronic messages?</u>

Messages sent during the failure period

37. In Submission 1 and 2, Buddybet provided copies of each of the messages sent to customers within the scope of this investigation. Buddybet described the purposes of these message as to:

    - ‘advise customer of a range of markets’
    - ‘advise customers of a Buddybet market’
    - ‘advise the customer that their account has been credited with a bonus bet’
    - ‘push notifications for bet outcomes/copies and social interactions such as chat notifications and followers. A push notification may also inform the user that they have promotional credits available for use’.

38. The ACMA has reviewed the content of these messages and considers that each message was a regulated electronic message as the purpose, or one of the purposes, of the message was to offer to provide licensed interactive wagering services or otherwise advertise or promote licensed interactive wagering services provided by Buddybet. Each unique message contained a variation of an offer of stakes or promotional credit. A sample of messages is included at **Attachment C**.

Verification email

39. The verification email was sent to the complainant seeking that the complainant verify their Buddybet account before they can “start enjoying Buddybet like all your friends”.

The email contains Buddybet's branding and links to the Buddybet app and to the Buddybet webpage. A copy of the email is at **Attachment D**.

40. The ACMA's assessment of this message is that its purpose, or one of its purposes, was to offer to provide licensed interactive wagering services, with the provision of such services subject to the recipient of the email verifying their account. Because of this purpose, the ACMA has found that the verification email is a regulated electronic message.

<u>Were the regulated electronic messages sent to electronic addresses of registered individuals?</u>

41. Submission 1 and 2 provided information about each customer that Buddybet sent messages to within the failure period, including their mobile phone number and email address. The verification complainant's email address was visible in the verification email forwarded to the ACMA as part of the complaint.

42. The ACMA cross referenced this customer information with the NSER to identify each Buddybet customer's entry in the NSER.

43. The ACMA then investigated the date and time each customer became a registered individual to determine whether a message was sent to the electronic address of a customer while they were a registered individual.

44. Through this information, the ACMA found that 69 messages sent by Buddybet were sent to electronic addresses that belonged to, related to, or were associated with registered individuals at the time the messages were sent. The 69 messages include:

    > 42 SMS messages to 18 unique phone numbers belonging to registered individuals

    > 19 emails to 15 unique emails addresses belonging to registered individuals

    > 8 push notifications to electronic addresses belonging to 8 registered individuals.

45. The ACMA acknowledges that, in the ordinary course of events, a wagering provider must take several steps to stop marketing to someone registered with the NSER. Once a person becomes a registered individual, a wagering provider needs to proactively query the register (for example, before it sends marketing) and then unsubscribe that person from marketing. As such, it is not always possible to prevent a person from receiving marketing immediately once they register with the NSER.

46. Consumers are advised when registering with the NSER, that self-exclusion may take 1 hour to become effective. As such, there is an understanding that a person may receive marketing material shortly after excluded. The ACMA also acknowledges that marketing campaigns involve processes to prepare and distribute messages.

47. For this reason, it may not be possible for an IWP to confirm whether the recipient of a message is a registered individual immediately prior to that message being sent. 1 regulated electronic message was sent to a customer within 1 hour of them becoming a registered individual. This message has been excluded from the findings. The ACMA found that Buddybet sent 68 regulated electronic messages to electronic addresses of registered individuals.

48. The ACMA has found that the electronic addresses were electronic addresses of registered individuals, because they were either:

    > In the case of phone numbers and email addresses:

        - listed in an individual's NSER record, and/or

- identified through the information provided in Submission 1 about each relevant customer it sent electronic messages to.

> In the case of electronic addresses (being push tokens) for push notifications:

- an app user must consent to receive push notifications
- after a user downloads the app and consents to receive push notifications, a push token must be generated by Apple or Google for the sole purpose of enabling an app developer to be able to communicate directly with the user of that device through the use of push notifications
- the app developer must store this information in order to communicate with APNs and FCMs to send push notifications. Buddybet provided evidence that it recorded information about each of the push notification it sent to each of the customers, suggesting a connection and association between the message and the recipient
- information from Apple and Google as described in Attachment B suggest that they maintain a connection between the push notification and the relevant Apple or Google account holder who downloads an app (respectively).

<u>Did Buddybet know the electronic addresses belonged to a registered individual or was it reckless to this fact?</u>

49. Subsection 61LA(4) is a civil penalty provision, which prohibits IWPs from sending, or causing to be sent, regulated electronic messages where the IWP is reckless to the fact that the electronic address is an electronic address of the registered individual.

50. Subsection 61LA(5) sets out the relevant test for recklessness:

> For the purposes of subsection (4), a person is ***reckless*** as to the fact mentioned in paragraph (b) of that subsection if:
>
> (a) the person is aware of a substantial risk that the fact exists; and
>
> (b) having regard to the circumstances known to the person, it is unjustifiable to take the risk.

51. The NSER was established to provide a one-stop process for consumers to exclude themselves from all IWPs. Consumers registered with the service have a reasonable expectation that by registering, IWPs will comply with their legal obligations to not open wagering accounts, provide wagering services, or market to them.

52. Buddybet was an established IWP operating in a regulated environment that requires it to put in place robust consumer protection measures under relevant Commonwealth, State and Territory law to protect its users, including the IGA.

53. Buddybet was aware of the substantial risk that an electronic address could belong to a registered individual from when the NSER launched on 21 August 2023 as Buddybet's customers were open to become registered individuals from this time.

54. Buddybet could only confirm whether a customer was a registered individual by making a valid request to the Register operator. In the absence of making such a request, Buddybet would have known that it would be unable to know whether electronic addresses it used for marketing purposes belonged to registered individuals.

55. For this reason, and from its submissions, Buddybet understood that it needed to implement systems and processes to make requests to the Register operator,

including before sending regulated electronic messages so that any recipients that were registered individuals could be removed from a marketing list.

56. In Submission 1, Buddybet stated that it had had multiple systems and processes in place to ensure it was capable of connecting to the NSER. Such processes involved making requests to the Register operator at certain trigger points including prior to sending any marketing communications to customers. This involved screening the recipient list by making requests to the Register operator:

    to ensure that the Customer has not registered with Betstop since they last placed a transaction or since the most recent 'wash'.' It they were found to be a registered individual, the customer 'will also be removed from the marketing list to ensure that they do not receive future marketing communications.

57. In Submission 2, Buddybet confirmed that this process applied to push notifications in addition to other communications such as SMS and email.

58. Further to Buddybet's submissions, the ACMA notes that:

    - On 28 August 2023, Buddybet wrote to the ACMA to self-report a complaint it received from a registered individual about receiving marketing. In this response Buddybet noted it checked the NSER when a new user registered, an existing user logged in and when an existing user made a bet, deposit or withdrawal. However, its systems at the time were not set-up to submit requests to the Register operator prior to sending marketing. Buddybet noted that because of this, it had identified a gap in its systems and processes. As a result, it had rectified its processes to check whether a customer was a registered individual prior to sending regulated electronic marketing.
    - On 1 September 2023 Buddybet wrote to the ACMA to self-report an incident where an employee did not follow its process to check the NSER prior to sending out marketing emails. The process required marketing to be approved by the manager or IT Director, who would then check the marketing list against the NSER. An employee did not seek this approval prior to sending marketing on 31 August 2023. Buddybet advised that this resulted in 37 registered individuals being sent marketing. Buddybet reviewed its processes and noted that it had since mandated that no communications could be sent to customers until the customers were checked against the NSER and that such requirement had been communicated to all staff responsible for undertaking customer communications.
    - The ACMA met with Buddybet on 8 September 2023 to discuss its self-reports. In this meeting, Buddybet noted it understood its legislated requirements. Buddybet also noted it became aware of the 31 August 2023 incident after 2 individuals that received the marketing emails informed Buddybet that they were registered individuals. Buddybet reiterated that it made changes to its processes to check the register before marketing is sent, as noted above.

59. From this, the ACMA found that Buddybet was aware of the risk that any of its customers could be a registered individual. Further, Buddybet also understood that a customer could become a registered individual at any time, and so it needed to have a system that would make requests periodically to ensure that it had up to date information about the current exclusion status of a customer, rather than rely on aged information.

Customers impacted during the failure period

60. The system failure and the delay in its detection meant that Buddybet failed to address the substantial risk that electronic addresses it was sending regulated electronic

messages to belonged to registered individuals. Between 4 December 2023 and 8 February 2024, Buddybet's systems did not establish whether individuals were registered individuals. However, Buddybet continued to send out regulated electronic messages.

61. This defect in Buddybet's systems remained undetected by Buddybet for a period of more than 2 months. Based on the evidence provided, Buddybet did not have adequate systems, reporting or supervision in place to identify the defect. Buddybet continued to send regulated electronic messages to electronic addresses of customers where it had not confirmed whether they belonged to registered individuals, and in circumstances where it was not monitoring if its systems were working. This is despite the substantial risk that it could be sending regulated electronic messages to the electronic address of registered individuals (per subsection 61LA(5)(a)).

62. In these circumstances, and noting that any customer could be a registered individual, the ACMA found that Buddybet was reckless as to the fact that the relevant electronic addresses were those of registered individuals.

Verification email

63. The consumer that received the verification email registered with the NSER on 21 August 2023. The verification email was sent on 14 May 2024 at 2:33 pm. The recipient's email was included in their NSER entry. The ACMA's review of Register logs suggest that Buddybet did not make a request under section 61NC to confirm whether the individual was a registered individual before sending the email.

64. The ACMA considers it is reasonable to infer that Buddybet failed to identify that this message was a regulated electronic message, and it is for this reason that its system did not seek to confirm whether the recipient was a registered individual and the reason the message did not include information about the NSER as required by the Register Rules (see Finding 9).

65. As detailed in paragraphs 49 to 59, Buddybet was aware of its obligations and the risk that an electronic address may belong to a registered individual. For this reason, Buddybet had implemented systems and processes to check whether a customer was a registered individual prior to sending regulated electronic messages.

66. Buddybet's failure to check the NSER before it sent the verification email meant that it was unable to establish whether the electronic address belonged to the registered individual.

Summary of findings

67. If Buddybet had submitted queries to the Register operator as per its established process prior to sending each of these 68 messages, the Register operator would have been able to inform Buddybet that the relevant customers were registered individuals.

68. Based on these circumstances, and having regard to:

- Buddybet's awareness of the substantial risks that electronic addresses may be the addresses of registered individuals
- its understanding of the need to have an effective technological system and processes in place to comply with its marketing obligations
- the failures of Buddybet's systems and processes (including its lack of testing and monitoring of its system and, for the verification email, an apparent failure to seek to confirm whether the recipient of the email was a register individual)

the ACMA found that Buddybet acted recklessly, for the purposes of subsection 61LA(4). The ACMA considers that it was unjustifiable for Buddybet to take the risk of sending regulated electronic messages without confirming if its systems were performing as designed and making requests to the Register operator under section 61NC (to confirm whether customers were registered individuals before marketing to them).

69. Based on these circumstances, the ACMA found that Buddybet sent 68 regulated electronic messages to electronic addresses in circumstances where Buddybet was reckless to the fact that the electronic addresses belonged to registered individuals.

70. The investigation found that these 68 messages were sent between 16 hours and 72 days after these individuals registered for self-exclusion.

71. The ACMA found that Buddybet sent 68 regulated electronic messages to electronic addresses where it was reckless to that fact that the electronic addresses belonged to registered individuals in contravention of subsection 61LA(4).

Finding 4 – No breach: Regulated telemarketing calls must not be made to a registered individual (Subsection 61LB(2))

Regulatory obligation

73. An IWP must not make, or cause to be made, a regulated telemarketing call to a registered individual.

Did Buddybet make regulated telemarketing calls to registered individuals?

74. Buddybet submitted that it did not make telemarketing calls to any of the affected customers during the failure period.

75. The ACMA has found no evidence that Buddybet made regulated telemarketing calls to registered individuals, or caused such calls to be made.

Finding 5 – No breach: Regulated direct marketing must not be sent to a registered individual (Subsection 61LC(2))

Regulatory obligation

76. An IWP must not send, or cause to be sent, regulated direct marketing material to a registered individual by a postal service or other like service.

Did Buddybet send regulated direct marketing to registered individuals?

77. Buddybet submitted that it did not send regulated direct marketing to any of the affected customers during the failure period.

78. The ACMA has found no evidence that Buddybet sent regulated direct marketing to registered individuals, or caused such marketing to be sent.

Finding 6 – Breach: Licensed interactive wagering service providers must not open accounts for registered individuals (Subsection 61MA(2))

Regulatory obligation

79. An IWP must not open a licensed interactive wagering service account for a registered individual.

Did Buddybet open licensed interactive wagering service accounts for registered individuals?

80. In Submission 1, Buddybet said that it opened 5 licensed interactive wagering service accounts during the failure period. Buddybet provided the customer details for each account, including the date and time that each licensed account was opened.

81. The ACMA cross referenced this customer information with the NSER to identify each Buddybet customer's entry in the NSER.

82. The ACMA investigated the date and time each customer became a registered individual to determine whether Buddybet opened a licensed interactive wagering service account for the individual after they became a registered individual.

83. The investigation has found that Buddybet opened licensed interactive wagering service accounts for 2 individuals who were registered individuals at the time the accounts were opened. These accounts were opened 5 and 35 days after the registered individuals self-excluded. This conduct is in contravention of subsection 61MA(2). Consistent with Finding 2, neither customer was provided with wagering services in contravention of section 61KA.

[redacted]

Finding 7 – Breach: Failure to close a licensed interactive wagering service account of a registered individual – no outstanding bets (Subsection 61MB(5))

Regulatory obligation

85. IWPs must, as soon as practicable after a person registers with the NSER, close the account of the consumer and pay any credit balance to that person, should that individual have no outstanding or pending bets.

86. Where an account has been closed, the IWP must not reopen, reactivate or reinstate the account. Where an account has not been closed as required, the IWP must not then provide the relevant individual wagering services through that account after they cease to be registered with the NSER. These requirements do not prevent an IWP from opening a new account for an individual after they cease to be a registered individual.

87. Subsection 64B(1) provides that each civil penalty provision of the IGA is enforceable under Part 4 of the *Regulatory Powers (Standards Provisions) Act 2014* (RPA), including the civil penalty provisions in sections 61MB and 61MC.

88. Subsection 93(1) in Part 4 of the RPA provides that if an act or thing is required under a civil penalty provision to be done within a particular period or before a particular time, then the obligation to do that act or thing continues until the act or thing is done (even if the period has expired or the time has passed). Subsection 93(2) of the RPA provides that a person who contravenes a civil penalty provision that requires an act or thing to be done within a particular period or before a particular time commits a separate contravention of that provision in respect of each day during which the contravention occurs.

89. Accordingly, an IWP that contravenes subsection 61MB(5) by failing to close a wagering account of a registered individual that has no outstanding bets and pay any credit balance as soon as practicable after the individual becomes a registered individual will be committing a separate contravention of that provision for each day that it fails to close the account after the expiration of the 'as soon as practicable' period.

90. The applicable timeframe for an IWP to close a wagering account 'as soon as practicable' may vary on a case-by-case basis.

Did individuals hold a licensed interactive wagering services accounts before becoming registered individuals?

91. Submission 1 detailed that the 125 customers impacted during the failure period had licensed interactive wagering services accounts with Buddybet prior to being identified as registered individuals. Finding 6 established that 2 of these accounts were opened after the relevant individuals became registered individuals. As such, 123 customers had accounts with Buddybet before becoming registered individuals.

Did individuals have any outstanding or pending bets attributable to the provision of a licensed interactive wagering service by the provider?

92. Submission 2 detailed that none of the 123 customers had pending or outstanding bets when they were identified as self-excluded.

Did Buddybet close the accounts and return any credit balance as soon as practicable after the individuals became registered individuals?

93. In considering whether Buddybet has complied with its obligations, the ACMA has considered Buddybet's submissions and its description of how its system queries the NSER and subsequently closes customer accounts.

94. Buddybet submitted that its system is configured so that, when a person is identified as self-excluded, "*a piece of code is triggered on our backend platform that automatically designates the account as a Betstop registered Customer and the account is closed*." As such, the ACMA understands that accounts are automatically and immediately closed by the Buddybet system when a customer is identified as a registered individual.

95. Submission 1 detailed that Buddybet closed the 125 accounts at 16:50 AEDT on 8 February 2024 once the underlying system issue was addressed. The ACMA confirmed that this was immediately after the Register operator informed Buddybet that the relevant individuals were registered individuals by reviewing system logs from the NSER.

96. Submission 1 also detailed that Buddybet had a process to undertake 'a twice daily 'wash' of all client accounts against the Betstop Register'. This means that Buddybet had a system to submit requests to the Register operator for each customer every 12 hours. As such, under normal circumstances, Buddybet should have been able to identify a customer as a registered individual no longer than 12 hours after they registered with the NSER.

97. The ACMA found the evidence from Buddybet demonstrates that it was reasonably practicable for Buddybet to close customer accounts immediately after it identifies a person as self-excluded as this is how it designed its system to operate and it provided evidence that its system is capable of operating in this manner.

98. The ACMA's assessment of affected accounts demonstrated that the 125 accounts were closed between 29 minutes and 86 days after the customers registered for self-exclusion.[3]

99. As noted in paragraph 90, the applicable timeframe for the 'as soon as practicable' requirement of subsection 61MB(5) may vary on a case-by-case basis. The ACMA considers that this requirement does not impose a standard of perfection on an IWP

[3] It is noted that 2 accounts were closed more than 66 days after the relevant individuals became registered individuals. Buddybet's submission did not detail why these accounts were not closed earlier.

but is to be assessed on the facts of a case by considering practicalities and all relevant circumstances to set a timeframe that is generally equivalent to as soon as is feasible.

100. The ACMA acknowledges that there may be a range of factors that contribute to how soon after a customer becomes a registered individual that it is practicable for an IWP to identify them as a registered individual, close their wagering account and pay any credit balance. The ACMA considers that these factors may include:

- the process required for an IWP to check its entire customer base, including inactive customers and those that have not interacted with their wagering accounts for an extended period of time
- any follow up actions required, such as the paying of a credit balance or lawful recovery of any debts.

101. Noting these factors, the ACMA has determined that, for the purpose of this investigation, it would have been reasonably practicable in the circumstances, due to the way in which Buddybet's systems and processes had been designed to function, for Buddybet to close each of the account within 7 days of the relevant customers becoming registered individuals.

102. The investigation found that 113 accounts were closed more than 7 days after the customers became registered individuals. The ACMA considered Buddybet's evidence including the systems and processes it had in place for closing an account after the relevant customer became a registered individual, and the circumstances in which the relevant accounts were closed.

103. The ACMA found that Buddybet did not close 113 licensed interactive wagering services accounts, that did not have pending or outstanding bets, and return any applicable credit balance, as soon as reasonably practicable after those individuals registered for self-exclusion.

104. As noted in paragraph 88, a separate contravention occurs each day where an IWP fails to close a customer's wagering account beyond when it was reasonably practicable to close the account. The ACMA has found 3,589 separate contraventions of subsection 61MB(5) where Buddybet did not close 113 licensed interactive wagering services accounts, that did not have pending or outstanding bets, and return any applicable credit balance, as soon as reasonably practicable after those individuals became registered individuals.

[redacted]

Finding 8 – No breach: Failure to close a licensed interactive wagering service account of a registered individual – outstanding bets (Subsection 61MC(5))

106. The requirements under section 61MC are materially the same as section 61MB as described in paragraphs 85 to 90, except this provision applies where a customer has outstanding or pending bets. Under this provision, an IWP must close the account as soon as practicable after any outstanding or pending bets are finalised.

Did Buddybet fail to close the accounts of registered individuals with outstanding bets?

107. Submission 2 detailed that none of the 125 customers had pending or outstanding bets when they were identified as self-excluded. Accordingly, the ACMA has not found any breaches concerning subsection 61MC(5).

Finding 9 – Breach: Licensed interactive wagering service providers must promote the NSER (Section 61JP)

108. Under section 61JP, an IWP is required to promote the NSER in accordance with rules specified by the ACMA. On 4 July 2022, the ACMA made the Register Rules.

109. Subsection 25(3) of the Register Rules requires that an IWP promote the NSER in regulated electronic messages by including, at a minimum (see subsection 25(1)):

a) a reference to 'BetStop'

b) a statement to the effect that BetStop is the national self-exclusion register

c) a hyperlink to the BetStop website.

Did Buddybet engage in conduct that contravenes the Register rules?

110. In Submissions 1 and 2, Buddybet provided the ACMA with evidence, in the form of spreadsheets, that it sent 314 messages to the 125 customers during the failure period. In addition, the verification complainant detailed an additional electronic message sent by Buddybet on 14 May 2024. The ACMA has reviewed each of these messages to determine whether Buddybet complied with section 61JP.

Part 1 – were the messages regulated electronic messages?

111. Finding 3 established that all messages sent by Buddybet were regulated electronic messages as the purpose, or one of the purposes, of the messages was to offer to provide licensed interactive wagering services or to advertise or promote licensed interactive wagering services.

Part 2 – did the messages include a reference to the NSER as required by section 25 of the Register rules?

112. All SMS messages sent by Buddybet contained the required references to the NSER, as set out in the Register Rules, through the inclusion of the following text:

> *BetStop - the National Self Exclusion Register is a free service for people who want to exclude from all Australian online wagering providers. For more info visit – https://www.betstop.gov.au*

113. 178 of 179 email messages sent by Buddybet contained the required references to the NSER, as set out in the Register Rules, through the inclusion of the same text used for SMS messages as described in paragraph 112. The exception was the verification email which sought to encourage the user to verify their account before they could start accessing Buddybet's wagering services. The verification email did not contain any reference to the NSER, including the information required by the Register rules. A copy of this email is at **Attachment D**. Consequently, the ACMA found that this 1 email was sent in contravention of section 61JP.

114. None of the 8 push notifications sent by Buddybet included information about NSER as required by the Register rules. Consequently, the ACMA found that these 8 push notifications were sent in contravention of section 61JP.

115. The ACMA's investigation has found that Buddybet sent 9 regulated electronic messages (comprising 8 push notifications and 1 email) that failed to include relevant information about the NSER as specified in subsection 25(3) of the Register Rules, in contravention of subsection 61JP(5).

[redacted]

Conclusions

117. The ACMA found that Buddybet:

- Has contravened subsection 61NC(9) on 66 occasions in relation to 66 days where Buddybet failed to take all reasonable steps to ensure that it had a computer system that was able to make requests to the Register operator under subsection 61NC(1).
- Has not contravened subsection 61KA(3) in relation to the provision of licensed interactive wagering services to registered individuals.
- Has contravened subsection 61LA(4) by sending 68 regulated electronic messages to electronic addresses where Buddybet was reckless to the fact that they belonged to a registered individual.
- Has not contravened subsection 61LB(2) in relation to making regulated telemarketing calls to a registered individual.
- Has not contravened subsection 61LC(2) in relation to sending regulated direct marketing to a registered individual.
- Has contravened subsection 61MA(2) by opening 2 licensed interactive wagering service accounts for registered individuals.
- Has contravened subsection 61MB(5) in relation to 3,589 separate contraventions of failing to close 113 licensed interactive wagering services accounts, that did not have pending or outstanding bets, as soon as practicable after the customers became registered individual.
- Has not contravened subsection 61MC(5) in relation to the failure to close licensed interactive wagering service accounts of registered individuals where there were pending or outstanding bets.
- Has contravened subsection 61JP(5) in relation to 9 regulated electronic messages sent where Buddybet failed to promote the NSER in accordance with subsection 25(3) of the Register Rules.

[redacted]

Attachments

Attachment A – Extract of relevant provisions

Attachment B – Push notification assessment

Attachment C – Example regulated electronic messages

Attachment D – Verification email

[redacted]

Attachment A

Key provisions of the IGA

Interactive Gambling Act 2001 Section 61JP Licensed interactive wagering service providers must promote the National Self-exclusion Register etc

(1) The Register rules may require licensed interactive wagering service providers to take specified action for the purposes of promoting the National Self-exclusion Register to their customers.

(2) The Register rules may require licensed interactive wagering service providers to take specified action directed towards ensuring that their customers are aware of, and can readily access, the following:

(a) the website of the National Self-exclusion Register;

(b) if there is an app for the National Self-exclusion Register—that app.

Offence

(3) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person engages in conduct; and

(c) the person's conduct contravenes Register rules made for the purposes of subsection (1) or (2).

Penalty: 120 penalty units.

(4) A person who contravenes subsection (3) commits a separate offence in respect of each day (including a day of conviction for the offence or any later day) during which the contravention continues.

Civil penalty provision

(5) A licensed interactive wagering service provider must not contravene Register rules made for the purposes of subsection (1) or (2).

Civil penalty: 180 penalty units.

(6) A person who contravenes subsection (5) commits a separate contravention of that provision in respect of each day during which the contravention occurs (including the day the relevant civil penalty order is made or any later day).

Exception

(7) Subsections (3) and (5) do not apply if the contravention occurred in circumstances prescribed by the Register rules.

Note 1: In a prosecution for an offence against subsection (3), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code*).

Note 2: In proceedings for a civil penalty order for a contravention of subsection (5), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offence—extended geographical jurisdiction

(8) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (3).

Interactive Gambling Act 2001 Section 61KA Prohibition of the provision of licensed interactive wagering services to registered individuals

Offence

(1) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person provides a licensed interactive wagering service to an individual; and

(c) the individual is a registered individual.

Penalty: 500 penalty units.

(2) A person who contravenes subsection (1) commits a separate offence in respect of each day (including a day of conviction for the offence or any later day) during which the contravention continues.

Civil penalty provision

(3) A licensed interactive wagering service provider must not provide a licensed interactive wagering service to a registered individual.

Civil penalty: 750 penalty units.

(4) A person who contravenes subsection (3) commits a separate contravention of that provision in respect of each day during which the contravention occurs (including the day the relevant civil penalty order is made or any later day).

Exception

(5) Subsections (1) and (3) do not apply if the licensed interactive wagering service provider took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In a prosecution for an offence against subsection (1), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code)*.

Note 3: In proceedings for a civil penalty order for a contravention of subsection (3), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offence—extended geographical jurisdiction

(6) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (1).

Interactive Gambling Act 2001 Section 61LA Regulated electronic message must not be sent to an electronic address of a registered individual

Offence—knowledge of provider

(1) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person sends, or causes to be sent, a regulated electronic message to an electronic address; and

(c) the electronic address is known by the person to be an electronic address of a registered individual.

Penalty: 120 penalty units.

Civil penalty provision—knowledge of provider

(2) A licensed interactive wagering service provider must not send, or cause to be sent, a regulated electronic message to an electronic address that is known by the provider to be an electronic address of a registered individual.

Civil penalty: 180 penalty units.

Offence—recklessness of provider

(3) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person sends, or causes to be sent, a regulated electronic message to an electronic address; and

(c) the electronic address is an electronic address of a registered individual; and

(d) the person is reckless as to the fact that the electronic address is an electronic address of the registered individual.

Penalty: 60 penalty units.

Civil penalty provision—recklessness of provider

(4) A licensed interactive wagering service provider must not send, or cause to be sent, a regulated electronic message to an electronic address if:

(a) the electronic address is an electronic address of a registered individual; and

(b) the person is reckless as to the fact that the electronic address is an electronic address of the registered individual.

Civil penalty: 90 penalty units.

(5) For the purposes of subsection (4), a person is ***reckless*** as to the fact mentioned in paragraph (b) of that subsection if:

(a) the person is aware of a substantial risk that the fact exists; and

(b) having regard to the circumstances known to the person, it is unjustifiable to take the risk.

Exception

(6) Subsections (1), (2), (3) and (4) do not apply if the licensed interactive wagering service provider took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In a prosecution for an offence against subsection (1), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code)*.

Note 3: In proceedings for a civil penalty order for a contravention of subsection (2) or (4), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offences—extended geographical jurisdiction

(7) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (1) or (3).

Interactive Gambling Act 2001 Section 61LB Regulated telemarketing calls must not be made to a registered individual

Offence

(1) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person makes, or causes to be made, a regulated telemarketing call to another person; and

(c) the other person is a registered individual.

Penalty: 120 penalty units.

Civil penalty provision

(2) A licensed interactive wagering service provider must not make, or cause to be made, a regulated telemarketing call to a registered individual.

Civil penalty: 180 penalty units.

Exception

(3) Subsections (1) and (2) do not apply if the licensed interactive wagering service provider took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In a prosecution for an offence against subsection (1), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code)*.

Note 3: In proceedings for a civil penalty order for a contravention of subsection (2), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offence—extended geographical jurisdiction

(4) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (1).

Interactive Gambling Act 2001 Section 61LC Regulated direct marketing material must not be sent to a registered individual

Offence

(1) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person sends, or causes to be sent, regulated direct marketing material to an individual; and

(c) the individual is a registered individual; and

(d) in a case where paragraph 61GH(1)(f) applies to the material—the person sends, or causes to be sent, the regulated direct marketing material to the individual by a postal service or other like service.

Penalty: 120 penalty units.

Civil penalty provision

(2) A licensed interactive wagering service provider must not send, or cause to be sent, regulated direct marketing material to a registered individual if:

(a) paragraph 61GH(1)(d) or (e) applies to the material; or

(b) in a case where paragraph 61GH(1)(f) applies to the material—the licensed interactive wagering service provider sends, or causes to be sent, the regulated

direct marketing material to the registered individual by a postal service or other like service.

Civil penalty: 180 penalty units.

Exception

(3) Subsections (1) and (2) do not apply if the licensed interactive wagering service provider took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In a prosecution for an offence against subsection (1), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code)*.

Note 3: In proceedings for a civil penalty order for a contravention of subsection (2), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offence—extended geographical jurisdiction

(4) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (1).

Interactive Gambling Act 2001 61MA Licensed interactive wagering service account must not be opened for a registered individual

Offence

(1) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person opens a licensed interactive wagering service account for an individual; and

(c) the individual is a registered individual.

Penalty: 120 penalty units.

Civil penalty provision

(2) A licensed interactive wagering service provider must not open a licensed interactive wagering service account for a registered individual.

Civil penalty: 180 penalty units.

Exception

(3) Subsections (1) and (2) do not apply if the licensed interactive wagering service provider took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In a prosecution for an offence against subsection (1), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code)*.

Note 3: In proceedings for a civil penalty order for a contravention of subsection (2), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offence—extended geographical jurisdiction

(4) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (1).

Interactive Gambling Act 2001 Section 61MB Closure of a licensed interactive wagering service account held by a registered individual—no outstanding or pending bets

Offence

(1) If:

(a) an individual becomes a registered individual; and

(b) immediately before becoming a registered individual:

(i) the individual had a licensed interactive wagering service account with a licensed interactive wagering service provider; and

(ii) the individual did not have any outstanding or pending bets that are attributable to the provision of a licensed interactive wagering service by the provider;

then:

(c) if, immediately before becoming a registered individual, the individual did not owe any debts to the provider that could lawfully be recovered by way of deduction from the account—the provider must, as soon as practicable after the individual becomes a registered individual:

(i) close the account; and

(ii) if the account has a credit balance—pay the individual an amount equal to the credit balance; and

(d) if, immediately before becoming a registered individual, the individual owed one or more debts to the provider that could lawfully be recovered by way of deduction from the account—the provider must, as soon as practicable after the individual becomes a registered individual:

(i) close the account; and

(ii) if the account would have a credit balance if the total amount of those debts were deducted from the account—pay the individual an amount equal to the difference between the balance of the account and the total amount of those debts; and

(e) if the individual ceases to be a registered individual before the closure of the account—the provider must ensure that the account is not used in relation to the provision, or prospective provision, of one or more licensed interactive wagering services to the individual after the cessation; and

(f) if the account has been closed—the provider must not reopen, reactivate, or reinstate the account.

(2) Paragraph (1)(e) does not prevent the licensed interactive wagering service provider from opening a new licensed interactive wagering service account for the individual if the individual ceases to be a registered individual.

(3) A person commits an offence if:

(a) the person is subject to a requirement under subsection (1); and

(b) the person engages in conduct; and

(c) the person's conduct breaches the requirement.

Penalty: 120 penalty units.

(4) Subsection (3) does not apply if the person took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In a prosecution for an offence against subsection (3), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code)*.

Civil penalty provision

(5) If:

(a) an individual becomes a registered individual; and

b) immediately before becoming a registered individual:

(i) the individual had a licensed interactive wagering service account with a licensed interactive wagering service provider; and

(ii) the individual did not have any outstanding or pending bets that are attributable to the provision of a licensed interactive wagering service by the provider;

then:

(c) if, immediately before becoming a registered individual, the individual did not owe any debts to the provider that could lawfully be recovered by way of deduction

from the account—the provider must, as soon as practicable after the individual becomes a registered individual:

(i) close the account; and

(ii) if the account has a credit balance—pay the individual an amount equal to the credit balance; and

(d) if, immediately before becoming a registered individual, the individual owed one or more debts to the provider that could lawfully be recovered by way of deduction from the account—the provider must, as soon as practicable after the individual becomes a registered individual:

(i) close the account; and

(ii) if the account would have a credit balance if the total amount of those debts were deducted from the account—pay the individual an amount equal to the difference between the balance of the account and the total amount of those debts; and

(e) if the individual ceases to be a registered individual before the closure of the account—the provider must ensure that the account is not used in relation to the provision, or prospective provision, of one or more licensed interactive wagering services to the individual after the cessation; and

(f) if the account has been closed—the provider must not reopen, reactivate, or reinstate the account.

Civil penalty: 180 penalty units.

(6) Paragraph (5)(e) does not prevent the licensed interactive wagering service provider from opening a new licensed interactive wagering service account for the individual if the individual ceases to be a registered individual.

(7) Subsection (5) does not apply if the licensed interactive wagering service provider took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In proceedings for a civil penalty order for a contravention of subsection (5), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offence—extended geographical jurisdiction

(8) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (3).

Debt recovery not affected

(9) To avoid doubt, the closure of a licensed interactive wagering service account under this section does not prevent the recovery of a debt owed by an individual to a licensed interactive wagering service provider.

Acquisition of property

(10) The provisions of this section have no effect to the extent (if any) to which their operation would result in an acquisition of property (within the meaning of

paragraph 51(xxxi) of the Constitution) from a person otherwise than on just terms (within the meaning of that paragraph).

Interactive Gambling Act 2001 Section 61MC Closure of a licensed interactive wagering service account held by a registered individual—outstanding or pending bets

Offence

(1) If:

(a) an individual becomes a registered individual; and

(b) immediately before becoming a registered individual:

(i) the individual had a licensed interactive wagering service account with a licensed interactive wagering service provider; and

(ii) the individual had one or more outstanding or pending bets that are attributable to the provision of one or more licensed interactive wagering services by the provider; and

(c) those bets are subsequently resolved (whether at the same time or at different times);

then:

(d) if, at the time, or the latest time, when those bets were resolved, the individual did not owe any debts to the provider that could lawfully be recovered by way of deduction from the account—the provider must, as soon as practicable after the time, or the latest time, when those bets were resolved:

(i) close the account; and

(ii) if the account has a credit balance—pay the individual an amount equal to the credit balance; and

(e) if, at the time, or the latest time, when those bets were resolved, the individual owed one or more debts to the provider that could lawfully be recovered by way of deduction from the account—the provider must, as soon as practicable after the time, or the latest time, when those bets were resolved:

(i) close the account; and

(ii) if the account would have a credit balance if the total amount of those debts were deducted from the account—pay the individual an amount equal to the difference between the balance of the account and the total amount of those debts; and

(f) if the individual ceases to be a registered individual before the closure of the account—the provider must ensure that the account is not used in relation to the provision, or prospective provision, of one or more licensed interactive wagering services to the individual after the cessation; and

(g) if the account has been closed—the provider must not reopen, reactivate, or reinstate the account.

(2) Paragraph (1)(f) does not prevent the licensed interactive wagering service provider from opening a new licensed interactive wagering service account for the individual if the individual ceases to be a registered individual.

(3) A person commits an offence if:

(a) the person is subject to a requirement under subsection (1); and

(b) the person engages in conduct; and

(c) the person's conduct breaches the requirement.

Penalty: 120 penalty units.

(4) Subsection (3) does not apply if the person took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In a prosecution for an offence against subsection (3), a defendant bears an evidential burden in relation to the matter in this subsection (see subsection 13.3(3) of the *Criminal Code)*.

Civil penalty provision

(5) If:

(a) an individual becomes a registered individual; and

(b) immediately before becoming a registered individual:

(i) the individual had a licensed interactive wagering service account with a licensed interactive wagering service provider; and

(ii) the individual had one or more outstanding or pending bets that are attributable to the provision of one or more licensed interactive wagering services by the provider; and

(c) those bets are subsequently resolved (whether at the same time or at different times);

then:

(d) if, at the time, or the latest time, when those bets were resolved, the individual did not owe any debts to the provider that could lawfully be recovered by way of deduction from the account—the provider must, as soon as practicable after the time, or the latest time, when those bets were resolved:

(i) close the account; and

(ii) if the account has a credit balance—pay the individual an amount equal to the credit balance; and

(e) if, at the time, or the latest time, when those bets were resolved, the individual owed one or more debts to the provider that could lawfully be recovered by way of deduction from the account—the provider must, as soon as practicable after the time, or the latest time, when those bets were resolved:

(i) close the account; and

(ii) if the account would have a credit balance if the total amount of those debts were deducted from the account—pay the individual an amount equal to the difference between the balance of the account and the total amount of those debts; and

(f) if the individual ceases to be a registered individual before the closure of the account—the provider must ensure that the account is not used in relation to the provision, or prospective provision, of one or more licensed interactive wagering services to the individual after the cessation; and

(g) if the account has been closed—the provider must not reopen, reactivate, or reinstate the account.

Civil penalty: 180 penalty units.

(6) Paragraph (5)(f) does not prevent the licensed interactive wagering service provider from opening a new licensed interactive wagering service account for the individual if the individual ceases to be a registered individual.

(7) Subsection (5) does not apply if the licensed interactive wagering service provider took reasonable precautions, and exercised due diligence, to avoid the contravention.

Note 1: The Register operator must, if requested to do so by a licensed interactive wagering service provider, inform the provider whether an individual is a registered individual (see section 61NC).

Note 2: In proceedings for a civil penalty order for a contravention of subsection (5), a defendant bears an evidential burden in relation to the matter in this subsection (see section 96 of the Regulatory Powers Act).

Offence—extended geographical jurisdiction

(8) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (3).

Debt recovery not affected

(9) To avoid doubt, the closure of a licensed interactive wagering service account under this section does not prevent the recovery of a debt owed by an individual to a licensed interactive wagering service provider.

Acquisition of property

(10) The provisions of this section have no effect to the extent (if any) to which their operation would result in an acquisition of property (within the meaning of paragraph 51(xxxi) of the Constitution) from a person otherwise than on just terms (within the meaning of that paragraph).

Interactive Gambling Act 2001 Section 61NC Access to the National Self-exclusion Register by a licensed interactive wagering service provider

(1) A licensed interactive wagering service provider may request the Register operator to inform the provider whether one or more specified individuals are registered individuals as at the time when the request is made.

(2) A request under subsection (1) must include, for each individual covered by the request:

(a) the individual's name; and

(b) such other information as is prescribed by the Register rules.

(3) The Register operator must:

(a) comply with a request under subsection (1); and

(b) do so within the period ascertained in accordance with the Register rules.

(4) The Register rules may make provision for and in relation to either or both of the following:

(a) the manner in which a request under subsection (1) is to be made;

(b) the manner in which the Register operator is to comply with a request under subsection (1).

(5) A manner mentioned in subsection (4) must involve the use of an internet carriage service.

Connectivity obligations of licensed interactive wagering service provider

(6) A licensed interactive wagering service provider must take all reasonable steps to ensure that the provider:

(a) has a computer system; and

(b) is continuously supplied with an internet carriage service;

that (when considered together) enable the provider to:

(c) make requests under subsection (1) at any time of the day or night; and

(d) be informed by the Register operator in compliance with those requests.

Offence

(7) A person commits an offence if:

(a) the person is a licensed interactive wagering service provider; and

(b) the person engages in conduct; and

(c) the person's conduct contravenes subsection (6).

Penalty: 120 penalty units.

(8) A person who contravenes subsection (7) commits a separate offence in respect of each day (including a day of conviction for the offence or any later day) during which the contravention continues.

Civil penalty provision

(9) A licensed interactive wagering service provider must not contravene subsection (6).

Civil penalty: 180 penalty units.

(10) A person who contravenes subsection (9) commits a separate contravention of that provision in respect of each day during which the contravention occurs (including the day the relevant civil penalty order is made or any later day).

Offence—extended geographical jurisdiction

(11) Section 15.4 of the *Criminal Code* (extended geographical jurisdiction—category D) applies to an offence against subsection (7).

Key Provisions of the Interactive Gambling (*National* Self-exclusion Register) Register Rules 2022

Section 25 Promoting the Register to customers

(1) Where a licensed interactive wagering service provider operates a website or an app in connection with its licensed interactive wagering services, it must, at a minimum, include:

(a) reference to BetStop;

(b) a statement to the effect that BetStop is the national self-exclusion register; and

(c) a hyperlink to the BetStop website,

on:

(d) the home page; and

(e) responsible gambling pages; and

(f) other pages promoting the provider's self-exclusion service, if any,

of that website or app.

(2) The information referred to in paragraphs (1)(a), (b) and (c) must be:

(a) prominently displayed;

(b) clear and legible;

(c) in a font size consistent with other text on the page; and

(d) positioned in close proximity to information about other responsible gambling or consumer protection measures.

(3) Where a licensed interactive wagering service provider sends a regulated electronic message, it must, at a minimum, include the information identified in paragraphs (1)(a), (b) and (c).

(4) Where a regulated electronic message referred to in subsection (3) is sent via SMS message, the message will comply with the requirements of that subsection if it contains a hyperlink to a separate webpage that includes the information referred to in paragraphs (1)(a), (b) and (c).

(5) Where a licensed interactive wagering service provider provides customers with activity statements, it must, at a minimum, include the information identified in paragraphs (1)(a), (b) and (c).

(6) Where a licensed interactive wagering service provider receives a voice call or electronic message from a customer to discuss:

(a) placing limits or controls on their gambling;

(b) responsible gambling options, including self-exclusion; or

(c) general assistance with problem gambling behaviour,

it must:

(d) inform the customer of the existence of BetStop; and

(e) provide them with the BetStop telephone number and the BetStop website address,

as soon as practicable after receiving the voice call or electronic message.

Note 1: The requirements in this section are made for the purpose of subsections 61JP(1) and (2) of the Act.

Note 2: It is an offence under subsection 61JP(3) of the Act to engage in conduct that contravenes Register rules made for the purpose of subsections 61JP(1) or (2) of the Act.

Key provisions of the Telecommunications Act 1997

Telecommunications Act 1997 Section 7 Definitions

internet carriage service means a carriage service that enables end-users to access the internet.

Telecommunications Act 1997 Section 16 Listed carriage services

(1) For the purposes of this Act, the following carriage services are ***listed carriage services***:

(a) a carriage service between a point in Australia and one or more other points in Australia;

(b) a carriage service between a point and one or more other points, where the first-mentioned point is in Australia and at least one of the other points is outside Australia;

(c) a carriage service between a point and one or more other points, where the first-mentioned point is outside Australia and at least one of the other points is in Australia.

(2) For the purposes of this section, a ***point*** includes a mobile or potentially mobile point, whether on land, underground, in the atmosphere, in outer space, underwater, at sea or anywhere else.

(3) For the purposes of this section, a point that is:

(a) in the atmosphere; and

(b) in or below the stratosphere; and

(c) above Australia;

is taken to be a point in Australia.

(4) For the purposes of this section, a point that is:

(a) on a satellite; and

(b) above the stratosphere;

is taken to be a point outside Australia.

ATTACHMENT B

Assessment of Push notifications

1. Section 61GE defines an electronic message as a message sent:
   a) using:
      i. an internet carriage service; or
      ii. any other listed carriage services, and
   b) to an electronic address in connection with:
      i. an email account; or
      ii. an instant messaging account; or
      iii. a telephone account; or
      iv. a similar account.

   [The legislation also includes a 'Note' that 'Email addresses and telephone numbers are examples of electronic addresses'].

2. Buddybet's mobile app is available for download on both Apple and Android (Google) devices.[4] Buddybet describes the app as allowing you 'to bet against the Buddybet community on a range of betting markets'.[5]

3. This investigation has considered how push notifications are sent to Apple and Android devices. Push notification services for apps operate within the proprietary app distribution systems established:
   > by Apple (for apps downloaded from the App Store for iOS devices) using Apple push notification services (APNs); or
   > Google (for apps downloaded from the Play Store for Android devices) using its Firebase Cloud Messaging services (FCMs).

4. Apple and Google have specific requirements for the management and sending of push notifications to which all application developers must adhere.

5. Apple states that, when users allow a currently installed application to receive notifications, a unique token is generated and registered to that developer and device.[6] Apple's developer guidance notes that its APNs:

   Must know the address of a user's device before it can send notifications to that device. This address takes the form of a device token unique to both the device and your app.[7]

6. This device token is referred to as a push token in this report. Apple states that this unique push token is 'the address of your app on the current device' and that the app server must have this token to send any notifications to a device.[8]

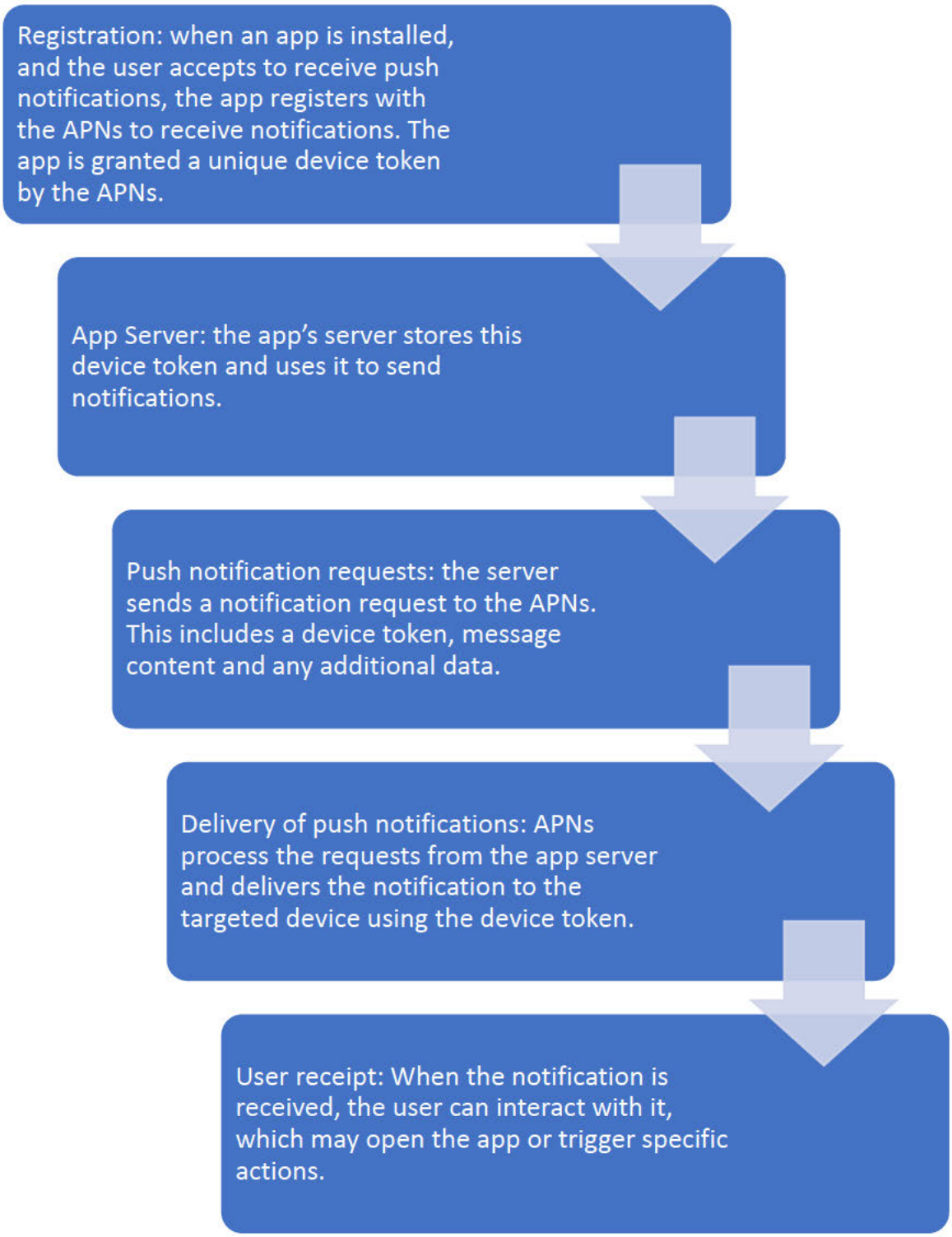
7. Underscoring the unique address that a push token represents, Apple's guidance states that:

   You can't use the same device token for more than one app, even when the apps are on the same device. Every app must request their own unique device token and forward it to your provider server.[9]

---

[4] https://buddybet.com/au/ accessed on 18 October 2024.
[5] https://buddybet.com/au/ accessed on 18 October 2024.
[6] Privacy - Device Requests - Apple accessed on 29 September 2024
[7] Registering your app with APNs | Apple Developer Documentation accessed 27 September 2024
[8] Registering your app with APNs | Apple Developer Documentation accessed 27 September 2024
[9] Registering your app with APNs | Apple Developer Documentation accessed 27 September 2024

8. A flowchart outlining the push notification process is below:



9. Google's Android push notification service works in a similar manner to Apple's push notification service. Google's developer guidance states that the FCM generates a 'registration token' for the client app instance before push notifications can be sent.[10] This registration token will be described as a push token for the purposes of this

[10] Best practices for FCM registration token management | Firebase Cloud Messaging (google.com) accessed on 27 September 2024

report. Like Apple, Google states that this push token must be stored by the app developer and used in notification requests to the FCMs to be able to send push notifications.

10. Apple provides app developers advice on how to use this device token, including that the token should be forwarded to the developer's server along with any other information the app developer needs to identify the specific user to the app developer's service.[11] Apple provides the example of a user's login name or something that connects them to the service.

11. Submission 2 provided evidence that Buddybet captures its push notification activity against the 'Client ID' of customers such that it is able to communicate with those individuals and keep records of messages sent to each individual.

12. The ACMA understands that as a device token relates to a specific instance of a particular app on a specific device, an app developer may have multiple device tokens for a user, representing a unique token for each instance of the app of a customer.[12] For example, Buddybet would have 2 push tokens for a user with the Buddybet app on both a mobile phone and a tablet. In choosing to send a push notification to that customer, Buddybet could choose to send 2 notifications using the 2 unique push tokens it has stored for that customer.

Were the push notifications sent using an internet carriage service or any other listed carriage services?

13. Section 4 defines an 'internet carriage service' as a 'listed carriage service that enables end-users to access the internet'. These terms are defined under the *Telecommunications Act 1997* (see extract of relevant provisions in **Attachment A**).

14. Based on information available in technical guidance on the workings of push notifications, the ACMA considers that Buddybet's app server communicates with the push notification services for either Google's FCMs or Apple's APNs to send push notifications to users of the Buddybet app using an internet carriage service.

15. The ACMA understands that such messages are sent from Buddybet's systems to Google's FCMs or Apple's APNs using an internet carriage service. An internet carriage service is also used by Google's FCMs or Apple's APNs (depending on the device type of a user) to 'push' the notification to the user's device.

16. As such, it is the ACMA's view that the 8 push notifications were sent by Buddybet's system and FCMs or APNs using an internet carriage service.

Were the push notifications sent to an electronic address?

17. The Notice to Buddybet required it to provide the ACMA with details of the electronic address to which it sent each push notification. Buddybet did not provide the electronic address to which each message was sent, rather it provided a 'Client ID'.

18. To establish whether the messages were sent to an electronic address, the ACMA considered *how* push notifications function for Apple and Google devices. As noted in paragraphs 4 to 9 of this attachment, Apple and Google have specific requirements for the management and sending of push notifications.

19. The app developer, in this case Buddybet, must comply with these requirements in incorporating push notifications into its app and to register its app for push notifications using FCMs and APNs.

[11] Registering your app with APNs | Apple Developer Documentation accessed 27 September 2024
[12] Registering your app with APNs | Apple Developer Documentation accessed 27 September 2024

20. When an app is published, users can download the app through the Apple App Store or Google Play store. Research and testing by the ACMA has determined that a user must have an Apple account to use the Apple App Store, or a Google account to use the Google Play Store.

21. Upon launching the app, a user is asked whether they consent to receive push notifications. This preference can generally be changed by the user at any time. If a user consents to receive push notifications, a push token is generated by, and registered with, FCMs and APNs (depending on which operating system the device uses) in conjunction with the app, consistent with the evidence presented in paragraph 5 for Apple devices and paragraph 9 for Google devices.

22. The device token is not publicly available and not visible to, or used by, the end user. This is unlike other electronic addresses such as an email address or telephone number (listed as examples of electronic addresses in the Note to subsection 61GE(1)).

23. As an example, device tokens for Apple are unique 64-character hexadecimal strings. Instead of a format such as <name@domain> or <tel:##########>, it is a format of <unique-ID-64-chars> to target a specific user's device. For example, Apple's developer guidance provides the following example of a push token:

    00fc13adff785122b4ad28809a3420982341241421348097878e577c991de8f0.[13]

24. The technical documentation from both Apple and Google cited in this report provide compelling evidence that these push notification tokens are an essential part of the message systems used by Apple and Google for sending push notifications.

25. Further, Apple's technical guidance provides developers information on how to generate a push notification request.[14] This guidance labels the header titled 'path' as a 'required' header for this message and references that the 'path' is the device token used to identify the user's device. An example of a push notification request from Apple is as follows:[15]

[13] Sending notification requests to APNs | Apple Developer Documentation accessed on 27 September 2024
[14] Sending notification requests to APNs | Apple Developer Documentation accessed on 30 September 2024
[15] Sending notification requests to APNs | Apple Developer Documentation accessed on 30 September 2024Highlight added to present when the push token is required in the request

```
HEADERS
  - END_STREAM
  + END_HEADERS
  :method = POST
  :scheme = https
  :path = /3/device/00fc13adff785122b4ad28809a3420982341241421348097878e577c991de8f0
  host = api.sandbox.push.apple.com
  authorization = bearer eyAia2lkIjogIjhZTDNHM1JSWDciIH0.eyAiaXNzIjogIkM4Nk5WOUpYM0QiLCAiaWF0I
          jogIjE0NTkxNDM1ODA2NTAiIH0.MEYCIQDzqyahmH1rz1s-LFNkylXEa2lZ_aOCX4daxxTZkVEGzwIhALvkClnx5m5eAT
          Lxw7LZtEQcH6JENhJTMArwLf3sXwi
  apns-id = eabeae54-14a8-11e5-b60b-1697f925ec7b
  apns-push-type = alert
  apns-expiration = 0
  apns-priority = 10
  apns-topic = com.example.MyApp
DATA
  + END_STREAM
  { "aps" : { "alert" : "Hello" } }
```

26. Evidence from Submission 2 support a position that Buddybet is able to target and send push notifications to different users of its app and stores records for each unique message sent to each user – for example, a message to a user informing them that promotion credit has been applied to their account. Further, Buddybet's submissions provide evidence that records of push notifications it has sent are stored against an 'Client ID' or customer number.

27. Accordingly, the ACMA is of the view that these push tokens constitute an electronic address for the purposes of section 61GE and these allow push notifications to be sent to a particular user of a device.

28. The ACMA is of the view that the push token is both:

    > electronic, in that it is a string of digital characters maintained in an electronic database for the purpose of sending digital notifications to an electronic device

    > an address, in that enables the app developer to identify the location of an electronic device with its app installed for the purpose of sending a notification. As cited in paragraph 6, Apple describes this token as an 'address' and that this address identifies the user device to receive the notification.[16]

29. The ACMA is of the view that the push token is a kind of electronic address that enables an app developer such as Buddybet to send a specific message to a specific user of an app on a device in a manner similar to how a telephone number is used to send an SMS message or an email address is used to send an email.[17]

30. Based on this information, the ACMA is of the view that it is open to infer that Buddybet must have held the electronic addresses (in the form of push tokens) of each relevant customer and that it must have sent 8 push notifications to these electronic addresses.

31. Accordingly, the ACMA found that Buddybet sent or caused the 8 push notifications to be sent to electronic addresses in the form of the push tokens.

[16] Sending notification requests to APNs | Apple Developer Documentation accessed on 27 September 2024

[17] The Note to subsection 61GE(1) provides that 'Email addresses and telephone numbers are examples of electronic addresses' but does not list these as exhaustive examples of electronic addresses

Are the push tokens an address in connection with an email, telephone or similar account?

32. Paragraph 61GE(1)(b) goes on to state that the electronic address is to be in connection with:
    i. an email account; or
    ii. an instant messaging account; or
    iii. a telephone account; or
    iv. a similar account.
33. It is not clear that a push token is in connection with an email, instant message or telephone account. As such, the ACMA has considered whether these tokens are in connection with a 'similar account'.
34. The Buddybet app can only be downloaded onto a device via the Apple App Store or the Google Play Store.[18] A user must have an Apple Account or a Google account to use the relevant stores and download apps. This has been confirmed through testing by the ACMA. Accordingly, the ACMA understands that a user must have a Google or Apple account to download the Buddybet app and consent to receive push notifications, even if the full details about that account are not disclosed by Apple or Google to Buddybet.
35. Apple describes its Apple Account (previously called an Apple ID) as an account you use across Apple's ecosystem including the App Store and iMessage.[19] This Apple Account is also associated with an Apple device. Testing by the ACMA shows that the Apple ID of the user is shown under 'settings' on an Apple device, establishing a connection between that user's account and the device that is used to receive push notifications. Similarly, a Google account provides access to services across Google's ecosystem, including email (Gmail) and Google Play, including being associated with a user's device or devices.[20] Testing by the ACMA shows that the Google account of the user is shown under 'settings' on an Android device, establishing a connection between that user's account and the device that is used to receive push notifications.
36. The ACMA understands that every instance of a Buddybet app on a device has been downloaded in connection with an Apple or Google account (as relevant). Once downloaded, the Buddybet app resides on the device in relation to the Apple or Google account that was used to download the app.
37. Testing by the ACMA has also shown that an app is visible when viewing downloaded apps through the relevant Apple or Google store applications. For example, the 'Manage apps & device' section of the Google Play Store will display that the Buddybet app is associated with a Google account if it has been downloaded previously. This provides a connection between the Buddybet app that is used to send the push notification and the Google or Apple account, as relevant, of a user.
38. As described in paragraph 5, upon consenting for push notifications, the Apple APNs and FCMs generate a push token with the user's device (which is associated with an Apple or Google account as described in paragraph 35). This push token must be sent to the app developer's server to allow them to communicate directly to that user, as described in paragraphs 6 and 9. The FCMs and APNs can only generate a token because the app is installed and associated with an Apple or Google account used on

[18] https://buddybet.com/au/ accessed on 18 October 2024.
[19] Legal - Apple Media Services - Apple and Manage and use your Apple Account – Apple Support (AU) accessed 27 September 2024
[20] Create a Gmail account - Gmail Help (google.com) accessed on 27 September 2024

a specific device. Otherwise, the ACMA is of the understanding that there is no way for FCMs or APNs to identify the location of the app on a specific device in order to be able to send a message.

39. On the basis of the matters described in this report, the ACMA considers that these Apple and Google accounts are similar to an email, instant messaging or telephone account as, amongst other features, they allow an account holder to be targeted and communicated to. The fact that the Apple and Google accounts provide access to a variety of services within the Apple and Google ecosystems do not make them dissimilar to a phone number or email address. In forming this view, the ACMA notes that a person's email address may be used by them as an account identifier for other services in addition to being an address for the purpose of sending and receiving electronic messages.

40. While the app developer may not be aware of the relevant Google or Apple account of the user, the ACMA considers that a push token is nonetheless associated with the relevant account as it allows communications to be sent directly to that individual through their device. Apple's Law Enforcement Support Program provides a framework for law enforcement agencies to seek customer information from Apple.[21] This program and Apple's reporting reveals that it can release identifying information to law enforcement agencies through a 'push token' request and states that:

    Push Token requests generally seek identifying details of the Apple Account associated with the device's push token, such as name, physical address and email address.[22]

41. This information from Apple suggests Apple maintains a connection between push tokens and a specific Apple account. Google provides a similar policy for law enforcement requests of account information.[23] Based on this evidence, the ACMA is of the view that the push tokens are connected with a Google or Apple account as they are generated by Google and Apple's services and stored in connection with the relevant account.

[21] https://www.apple.com/au/privacy/government-information-requests/ accessed on 27 September 2024
[22] Apple Privacy information page accessed on 27 September 2024
[23] How Google handles government requests for user information – Privacy & Terms – Google accessed on 27 September 2024

ATTACHMENT C

Example of Email, SMS and push notification messages

SMS 1

DATE SENT: 10:40am 4th December 2023

CONTENT: $1K NFL JACKPOT - Closing Soon!
Packers vs Chiefs
Pick the player who has the most receiving yards for the chance to share in $1,000!
Login - https://link.buddybet.com/nfl
IMAGINE WHAT YOU COULD BE BUYING INSTEAD. For free confidential support call 1800 858 858 or visit gamblinghelponline.org.au
BetStop is the national self-exclusion register - https://www.betstop.gov.au/
Unsubscribe [unsub-reply-link]

Push Notification

Date	Title	Message
2024-01-31 11:41:00 am	Promotional Credit	Thanks for using Buddybet! Here's a 30 promotional credit.

ATTACHMENT D

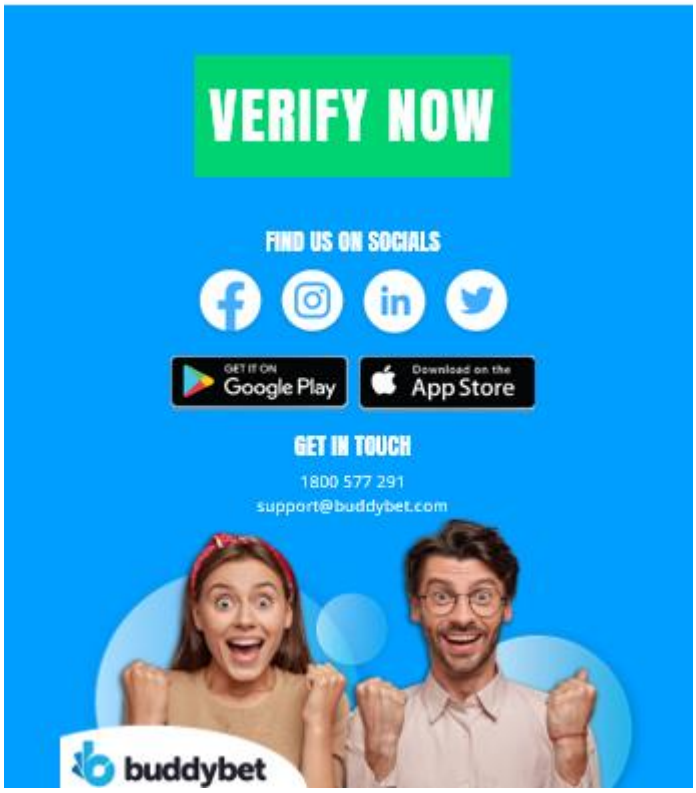
Verification reminder email

Hi ,

You are almost set to start enjoying Buddybet like all your friends. Simply click the 'verify now' button to proceed.

You will then need to go to your profile page,

Click on "unverified"
Fill out your details
Click "Verify these details"

If you have any issues with this process, please contact customer service on support@buddybet.com or call 1800 577 291.

Regards,
Buddybet Team