

**Memorandum of Understanding between  
The Isle of Man Gambling Supervision Commission and  
The Danish Gambling Authority**

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**1. Introduction**

- 1.1. This Memorandum of Understanding ("MoU") establishes a proposed framework for cooperation and the broad principles of collaboration between the Isle of Man Gambling Supervision Commission (the "GSC") and the Danish Gambling Authority ("the DGA") collectively referred to as (the "Parties") throughout this document.
- 1.2. The shared aim of the Parties is to enable closer cooperation to support the discharge of their respective regulatory functions and duties.
- 1.3. This MoU is a statement of intent and does not create legally binding obligations for either the GSC or the DGA. The arrangements outlined in this MoU are subject to, and must be interpreted in accordance with, the applicable laws and regulatory requirements of each Party's respective jurisdiction.
- 1.4. The Parties have determined that the current volume of information exchanged does not necessitate a separate data sharing agreement. This position will be reviewed regularly and may be reconsidered should the level of information exchange increase

**2. The role and function of the Isle of Man Gambling Supervision Commission**

- 2.1 The GSC is an independent Statutory Board of the Isle of Man Government. The Board of the GSC comprises of independent members of the public appointed by the Isle of Man Treasury.
- 2.2 The GSC oversees the licensing and regulation of all online and land-based gambling operations on the Island as well as the licensing and regulating of the Isle of Man medicinal cannabis sector.
- 2.3 Specifically in relation to the licencing and regulation of online gambling hosted by Isle of Man registered companies, the GSC's powers come from the Gambling Supervision Act 2010 (the "GSA"), the Online Gambling Regulation Act 2001 ("OGRA"), the Gambling (Anti-Money Laundering and Countering the Financing of Terrorism) Act 2018 ("AML/CFT") and respective secondary legislation, collectively referred to as the ("Isle of Man Gambling Acts").

2.4 In relation to the gambling sector, the GSC has three core regulatory objectives as set out in section 5 of the GSA, which are: -

- Ensuring that gambling is conducted in a fair and open way.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- Preventing gambling from being a source of crime or disorder; associated with crime or disorder; or used to support crime.

2.4 In support of these specific objectives, the key functions of the GSC are: -

- To issue new operating licenses under the various Isle of Man Gambling Acts to organisations and individuals who are providing facilities for gambling.
- To investigate the character and financial status of any person applying for or holding any licence or otherwise concerned with the operation of any online gambling conducted in the Island.
- To impose licence conditions on the provision and management of gambling facilities.
- To monitor compliance with the regulatory requirements of all licensees through its compliance work.
- To investigate breaches of licence conditions and take regulatory action where appropriate.
- To investigate and instigate criminal proceedings or impose civil penalties in response to illegal gambling and other offences committed under the Isle of Man Gambling Acts.

2.5 A number of offences are provided for under the Isle of Man Gambling Acts, for which the GSC has the power to investigate and (if appropriate) instigate criminal proceedings as well as impose civil penalties.

### **3. Functions and powers of the Danish Gambling Authority**

3.1 The DGA is an executive authority under the Danish Ministry of Taxation.

3.2 The DGA is tasked with the administration of gambling legislation, including lotteries, betting, online casinos, gaming machines, public poker tournaments, and land-based casinos.

3.3 The DGA key duties include issuing licences to provide gambling, supervision of gambling operators, and monitoring the gambling industry. Other important tasks include prevention of money laundering, financing of terrorism and financing of proliferation, international cooperation, ensuring responsible gambling, and advisory services.

- 3.4 The authority ensures the framework for a fair gambling market and rely on the following core values:

**Knowledge**

The DGA takes pride in efficiently supervising gambling operators. We take a professional approach to our work and are experts in our field. We build our administration on a high level of professionalism and dedication.

**Collaboration**

The DGA has room for differences, which means that we allow for differences and are open to new ideas. We highly prioritise team spirit, job-satisfaction, and trust. Mutual respect for each other is essential to the way we manage our activities.

**Perspective**

The Danish Gambling Authority is at the forefront of industry developments and dares to break new grounds. We are open to new perspectives in our supervision and maintain an ongoing dialogue with our stakeholders. Gambling is internationally anchored, and thus it is vital that we focus on gambling developments in other countries.

**Responsibility**

The Danish Gambling Authority takes responsibility for a well-regulated and a fair gambling market. We focus on the protection of players as well as the protection of children, young persons, and vulnerable persons. We strive to provide information and guidance on the framework for legal gambling.

**4. Principles of cooperation**

- 4.1 Subject to any legal restrictions on the disclosure of information (whether imposed by statute or otherwise) and at their discretion, the parties may:
- Communicate as required to discuss matters of mutual interest (this may involve participating in multi-agency groups to address common issues and threats); and
  - Consult one another on any issues which might have significant implications for the other organisation.
  - Exchange relevant information to assist them in discharging their respective regulatory functions and duties.
- 4.2 The parties will comply with the general laws they are subject to, including, but not limited to, local data protection laws; the maintenance of any prescribed documentation and policies; and comply with any governance requirements in particular relating to security and retention, and process personal data in accordance with the statutory rights of individuals.

## **5. Duration and review of the MoU**

- 5.1 The parties will monitor the operation of this MoU and will review it as needed.
- 5.2 Any issues arising in relation to this MoU will be notified to the key contact for each organisation as listed at paragraph 7.
- 5.3 Any changes to this MOU identified between reviews may be agreed in writing between the parties.
- 5.4 If it appears there is a need to exchange sufficient quantities of information, a separate agreement may be agreed in writing between the parties.
- 5.5 Either party may bring this MOU to an end by giving 30 days' notice in writing to the other party.
- 5.6 Any issues arising in relation to this MoU will be notified to the key contact for each organisation as listed below in section 7.

## **6. Publishing Information**

- 6.1 As part of the parties' commitment to transparency, the details of this MoU such as the name of the organisations and the date the MoU was signed may be published on each party's website.

## **7. Key contacts**

- 7.1 The parties have both identified a key person who is responsible for managing this MoU:

### **Isle of Man Gambling Supervision Committee**

Nick Robinson

Data Protection Officer

Telephone: +44 (0) 1624 698322

Email - [DPO-GSC@gov.im](mailto:DPO-GSC@gov.im)

### **The Danish Gambling Authority**

Lerchesgade 35, 6

5000 Odense C

Telephone: +45 72 38 79 13

Email: [mail@spillemyndigheden.dk](mailto:mail@spillemyndigheden.dk)

- 7.2 Those individuals will maintain an open dialogue between each other in order to ensure that the MoU remains effective and fit for purpose. They will also seek to identify any difficulties in the working relationship, and proactively seek to minimise the same.

## 8. Signatures

The duly authorised representatives of the parties whose signature appears below sign this MoU.

The Agreement shall come into force on the date of the most recent signature.

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On behalf of Isle of Man Gambling Supervision Committee being duly authorised:

**Mark Rutherford in his capacity as the Chief Executive Officer**

Signature:



Date:

17<sup>th</sup> December 2025

On behalf of the Danish Gambling Authority being duly authorised:

**Anders Dorph in his capacity as the Director**

Signature:



Date:

18. December 2025