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**From:** [REDACTED]  
**Sent:** 24 August 2015 12:28  
**To:** [REDACTED]  
**Subject:** Re: OL 43061 BetIndex Limited: Website Review

[REDACTED]

Thanks for getting back to us swiftly again ... apologies for delayed response, I was travelling back from our tech office in Bangkok.

The link requested is now in place and working.

With regards to the duplication of copy ... thanks for pointing that out, we're creating central repository for all Ts & Cs, Privacy, Cookies, FAQ etc, to enable us to make global changes across web, mobile and native apps, and will rework the copy as soon as it is in place which will be in next few days.

With regards to the latest round of funding, we have received all payments for this and I will forward on the paperwork for this now. It may take a short while for Companies House to process this.

[REDACTED] is drafting the loan agreement between Fame Ventures & BetIndex and I've asked her to forward this to you directly.

Do please let us know if there's anything else you need

Best regards

[REDACTED]



[www.fameventures.co.uk](http://www.fameventures.co.uk)

On Thu, Aug 20, 2015 at 4:09 PM, [REDACTED] wrote:

[REDACTED]

I have re-checked the website:

- The word remote is now correct on the website.
- The reference to basic level protection is no longer there but I have copied the wording that I am seeing below because there seems to be a bit of repetition between the first and second paragraphs. This isn't a compliance issue because the information is there and the link to the GC website works, but you may want to consider re-wording the section so that it flows better. The wording after the link to the GC website seems to be almost an exact repeat of the information in the first paragraph.

BetIndex is required by its licence to inform you about what happens to funds which it holds on account for you, and the extent to which funds are protected in the event of insolvency. We hold customer funds separate from company funds in an investment bank account. These funds are protected in the event of insolvency. This meets the Gambling Commission's requirements for the segregation of customer funds at the level: medium segregation.

Sums deposited in your account will be held within a standalone trading account held in the name of BetIndex Limited. This account is separate to BetIndex Limited general trading account and is used for all of BetIndex Limited customers. Only trading deposits and withdrawals will be processed within this account. We are required by our licence to inform customers about what happens to funds which we hold on account for you, and the extent to which funds are protected in the event of insolvency

[www.gamblingcommission.gov.uk/consumers/protection\\_of\\_customer\\_funds.aspx](http://www.gamblingcommission.gov.uk/consumers/protection_of_customer_funds.aspx). We hold customer funds separate from company funds in a standalone bank accounts and in reserve funds which we hold with our payment processors. These funds are protected in the event of insolvency. This meets the Gambling Commission's requirements for the segregation of customer funds at the level: medium segregation.

- The Responsible Gambling page in the customer area is fine but when I tried the link from the bottom of the page it just brought up a Blank Page.

I have almost completed the application assessment for BetIndex and the Change of Corporate Control for Fame Ventures, but there are a couple of items outstanding, namely the shares register for Fame Ventures and the loan agreement for BetIndex. Can you confirm when these will be available.

Thank you

Regards



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, August 20, 2015 10:53 AM  
**To:** [REDACTED]  
**Subject:** Re: OL 43061 BetIndex Limited: Website Review

[REDACTED]

We've made the change to the Responsible Gambling Page

If you can see:

*If you want to have a break from gambling you can use our self exclusion options. Further information can be found in the 'Self-Exclusion or Opt-out' section below.*

Then we know you are on new revised page and all other changes should also be evident.

With thanks

Best regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[www.fameventures.co.uk](http://www.fameventures.co.uk)

On Wed, Aug 19, 2015 at 11:27 AM, [REDACTED] wrote:

Thank you for your prompt response [REDACTED] I will wait for you to let me know about the further changes.

Regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, August 19, 2015 11:24 AM  
**To:** [REDACTED]

**Subject:** Re: OL 43061 BetIndex Limited: Website Review

[REDACTED]

Thanks very much for getting back to us with your observations ..... please see my notes below

- It still says "Romote" rather than "Remote" at the bottom of the screen but I assume this will be corrected when you have the new licence number for BetIndex;

I think this must be a caching issue as it currently does read 'Remote' on site <http://dev.footballindex.co.uk/#home>. We're on a dev environment and that might have some impact on the caching issue.

- There are now two statements in the T&Cs regarding the protection of customer funds, one saying basic level of protection and one saying medium. From the information provided it would appear that basic level is the correct assessment of the protection provided, so the additional statement needs to be removed.

As above we believe this is a caching issue, [REDACTED] advised medium level protection for customer funds and we believe that this has been implemented and there are only mentions of 'medium' level protection (as per her email of 31st July).

- On the Responsible Gambling page you have added a section on self-exclusion, which is fine, but there remains a reference in point 5 of the Staying in Control section which only mentions a 6 month self-exclusion. I would suggest removing this reference and directing customers to the full details of self-exclusion at the bottom of the page.

Noted with thanks and we'll make this change now and let you know when it's done

- You haven't addressed how the specific terms and conditions for promotions are going to be made available to customers.

Promotions – can you confirm that, if promotions are provided, there will separate terms and conditions available to explain the use of these promotions and that this information will be no-more than one click away from the promotion page.

Apologies for this oversight ... yes we can confirm the above to be the case

For simplicity's sake I suggest that you review all of the above again once we notify you of change to point no. 3. which will be first thing tomorrow morning.

With thanks

Regards

[Redacted]

Please respond by 21 August 2015.

Regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, August 18, 2015 11:45 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: OL 43061 BetIndex Limited: Website Review

[REDACTED]

With regards to your email of 12 August attaching your website review, we have now made the changes requested to the site (with the exception of adding the UK GC license no.), and it's ready for you to check.

As per previous email login details herewith:

[REDACTED]

[REDACTED]

[REDACTED]

I hope we've covered everything, but obviously let me know if there are outstanding issues.

With thanks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[www.fameventures.co.uk](http://www.fameventures.co.uk)

On Wed, Aug 12, 2015 at 4:07 PM, [REDACTED] wrote:

[REDACTED]

Please find attached a letter for [REDACTED] regarding a website review that I have carried out on the test site for BetIndex.

A response to the letter is required by 19 August 2015.

Regards



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12 August 2015



**Application for a General Betting Standard (Real Events) Category F Operating Licence**  
**Account ID: 43061**  
**Operating Name: BetIndex Limited**

## Website Review

Thank you for providing a domain name and login details for the BetIndex test website. A website review has been carried out this site and the following issues have been identified:

- Fame Ventures Limited – there are multiple references on the website to Fame Ventures Limited as the provider of the gambling facilities. If a licence is granted to BetIndex, and the website is to be offered under this licence, these references must be changed so that it is clear to customers that the facilities are provided under the licence held by BetIndex. This will mean changing the licence number at the bottom of the page, updating the link to the Public Register, and changing references from Fame Ventures to Betindex wherever they occur on the website. Could I also point out that at the moment the wording at the bottom of the page says “Combined **Romote** Operating Licence” rather than “Remote”.
- Numbering of Clauses – please review the terms and conditions for numbering errors as I have found several instances where the references within the paragraphs are incorrect e.g. 9.16, 10.2, 10.4.
- Protection of Customer Funds – the statement in the terms and conditions on the protection of customer funds is that the protection provided meets the basic level. However, in an e-mail dated 31 July 2015 [REDACTED] stated that accounts are being set up with Nedbank and that the level of protection for the customer account will meet the medium level. Please confirm if this is correct and if so the terms and conditions will need to be updated to reflect this. Please also ensure that there is a link in the terms and conditions to the Commission's guidance <http://www.gamblingcommission.gov.uk/Consumers/Protection-of-customer-funds.aspx>
- Changes to Terms and Conditions – it states on the website in relation to changes to terms and conditions that BetIndex will notify customers prior to the changes being made. Please explain how customers will be notified.
- Privacy Policy – please amend the privacy policy to make it clear to customers that information may be provided to the Gambling Commission as part of the licensing requirements.
- Complaints Procedure – the complaints procedure in the terms and conditions is very difficult to locate as it is just one clause under the “Winnings and Payment” heading, and there is very little information provided on your complaints policy prior to reaching the

disputes stage. It would be preferable for "Complaints and Disputes" to be a separate heading the terms and conditions and for there to be more detail on your complaints procedure e.g. is it a multiple-stage process, what is the timeframe for dealing with complaints, will the customer receive an acknowledgement that the complaint has been received and is being considered etc.

- Self-exclusion – the self-exclusion information on the Responsible Gambling page in the customer area seems to suggest that self-exclusion is only available for 6 months. Please ensure that this information matches the information on self-exclusion in the terms and conditions. In addition, please include information on cooling-off periods if a customer asks to re-open an account at the end of the self-exclusion period.
- Promotions – can you confirm that, if promotions are provided, there will separate terms and conditions available to explain the use of these promotions and that this information will be no-more than one click away from the promotion page.
- Voiding Bets – in clause 14 of the terms and conditions please make it clear that if a bet is voided because a customer has been found to be underage the winnings cannot be paid out but that the stake will be returned.

Please respond to the above by 19 August 2015.

When corresponding with the Gambling Commission on this matter, please quote the account ID number above.

If you have any queries regarding the information requested, please contact me [REDACTED]

Yours sincerely

[REDACTED]  
[REDACTED]

## Website Assessment

Class	Question	Outcome Date	Outcome	Comment
Provision	Does the operator set out clearly whether they protect customer funds in the event of insolvency?	28/08/2015 14:00	Pass	Website review conducted on test site using domain name and login details provided by operator in e-mail " Website Review - Password and Link". There is a statement in the T&Cs regarding the level of protection for customer funds which meets the basic level of protection but this is contrary to the information provided [REDACTED] which states that the level of protection meets the medium level ("Shareholder loan + bank accounts"). Clarification was requested. 19/08: A second review found that there were two statements in the T&Cs, one stating basic level protection and one medium level. The operator has been asked to remove the statement regarding the medium level as the information provided suggests that the protection provided is no higher than basic level - see "Second Website Review". 20/08: There is now only reference to medium level protection and this appears to be appropriate ("Awaiting loan agreement").
Provision	Does the website clearly display its licensed status?	19/08/2015 09:42	Pass	The website still refers to Fame Ventures as the licence holder. The operator has been advised that this will need to be amended before the website is made available under a licence granted to BetIndex. 19/08: A second website review has confirmed that references to Fame Ventures have been removed. The licence number will be changed when the BetIndex licence is determined and granted.
Provision	Are the activities offered appropriately licensed?	12/08/2015 11:41	Pass	The activities on the website match the business plan.
Provision	Do the bonus or incentives offered allow an informed decision to be made by a customer?	28/08/2015 14:02	Pass	There are no promotions on test website. Clarification on how T&Cs for promotions will be provided has been requested. 19/08: Operator has confirmed that if there

### Website Assessment

				are any promotions the T&Cs for these will only be one click away from the promotion ("Response to Second Website Review").
Provision	How does the operator evidence that their rules are fair and open?	19/08/2015 09:44	Pass	The T&Cs are easy to locate but will need to be amended because they constantly refer to Fame Ventures as the operator. There are issues with the numbering of the clauses. There is a statement that the operator will inform customers of any "substantial" changes to T&Cs but the operator has been asked to confirm how this will be achieved. 19/08: A second website review has confirmed that references to Fame Ventures have been removed, the T&Cs have been renumbered and customers are made aware in the T&Cs that any changes will be notified to them via a pop-up message when they login which they must accept to proceed.
Provision	Does the operator provide the rules for all products offered?	12/08/2015 11:47	Pass	The game rules are available in the Help section of the customers account and are clear and detailed.
Provision	How does the operator deal with complaints/unresolved disputes?	19/08/2015 09:46	Pass	Contact details for IBAS are provided as the ADR. However, the information is very difficult to find as it is under the "Winnings & Payment" section and is very brief as very little information is provided on the operator's complaints procedure before reaching the disputes stage. Further details have been requested. 19/08: A second website review has confirmed that there is now a separate section in the T&Cs for complaints and disputes and much more information has been provided on the complaints procedure.

### Website Assessment

Provision	How does the operator exclude those under-18s from gambling or attempting to gamble (NB under- 16s for lotteries)?	12/08/2015 12:56	Pass	There is an 18+ sign at the bottom of each web page. Customers are required to provide a DOB when registering for an account. Electronic cheques are carried out by the company to confirm ID and ID documents can be requested if there are concerns. There is a warning in the Age Policy on the Support section of the website that confirms that it is illegal to gamble underage.
Provision	Does the website ensure that information for the potential of problem gambling is made available to customers?	12/08/2015 13:23	Pass	There is a responsible gambling page in the Help section of the customer account. This give information on recognising when a player has a problem with gambling, links to organisations, provides filtering software and gives customers information on setting deposit limits and how to self-exclude.
Provision	How does the operator deal with customers who wish to be excluded from gambling?	28/08/2015 14:03	Pass	Self-exclusion information in the T&Cs confirms that 6 months is the minimum period and that this can be increased to 5 years but there is no information regarding cooling-off periods and the self-exclusion information on the Responsible Gambling page indicates that self-exclusion is for 6 months only. This has been raised with the operator. 19/08: A second website review has confirmed that there is now a reference to cooling -off period of 24 hours at the end of a self-exclusion period and additional information has been provided on the Responsible Gambling page, although there is still a reference in the Staying in Control section which only mentions 6 month self-exclusion periods. 20/08: The Staying in Control section has been amended to refer customers to the self-exclusion section on the page for full details.

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**From:** [REDACTED]  
**Sent:** 06 August 2015 11:14  
**To:** [REDACTED]  
**Subject:** Re: OL 43061 BetIndex Limited: Website

[REDACTED]

Sorry about that, we are implementing an email validation system for added customer protection and that test account has not been verified.

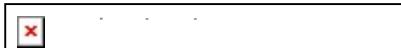
Please use the following username and password to login to [REDACTED] which is verified.

[REDACTED]

I'm about to respond to your previous email with regards to shareholdings in Fame Ventures.

Regards

[REDACTED]



[www.fameventures.co.uk](http://www.fameventures.co.uk)

----- Forwarded message -----

**From:** [REDACTED]  
**Date:** Thu, Aug 6, 2015 at 10:10 AM  
**Subject:** OL 43061 BetIndex Limited: Website  
**To:** [REDACTED]

[REDACTED]

Thank you for providing a link to the test website. I have checked the link and it is working but can you confirm whether the purpose of the e-mail address and password are to enable me to login or sign-up? I tried logging in using those details and it wouldn't allow me access.

Thanks



Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, August 04, 2015 5:10 PM  
**To:** [REDACTED]  
**Subject:** Re: FW: OL 38866 Fame Ventures Limited: Change of Corporate Control

[REDACTED]

Many thanks for your email and for your help over the phone.

[REDACTED]

Subsequently to that all existing shareholders have agreed to participate in a further round to add an additional £100,000, and have agreed to wait until this round is completed before receiving both sets of share certificates through the post. This is just for practical reasons as there are a few shareholders some not being resident in the UK and this was the simplest solution.

Our accountant is now fully familiar with the GC Change of Control procedures and will not be taking any future actions without informing me.

With regards to the BetIndex Ltd application, I have just spoken with NMi and they have assured me that we will have test results that we can forward on to you by the end of the week. This then I believe satisfies the basic GC requirement for the software to be made live with a licensed operator

Please have a look at the site here: [REDACTED]

[REDACTED]

[REDACTED]

Finally I can confirm that both [REDACTED] represent Fame Ventures with regards to all GC matters.

Please don't hesitate to contact me with any issues or questions

Best regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

On Tue, Aug 4, 2015 at 3:07 PM, [REDACTED] wrote:

[REDACTED]

Thank you for your letter in regards to the Change of Control application and your explanation as to the reason for the delay in submitting the application.

As discussed in our recent telephone call, please provide further details as to when the final paperwork and share certificates are expected to be issued and why they haven't been issued yet.

In addition, please confirm that [REDACTED] can be added as contacts to the Fame Ventures account.

Finally, could I ask you to confirm which e-mail address you would prefer the Commission to use for you as we currently have 2 different e-mail addresses.

Thank you

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, July 31, 2015 8:35 PM  
**To:** [REDACTED]  
**Subject:** Re: FW: OL 38866 Fame Ventures Limited: Change of Corporate Control

[REDACTED]

Further to my email earlier today I have now had a chance to review and respond, and thanks again for sending the second email.

Please see attached letter of explanation and also amended Change of Control application form.

We are as stated in the letter extremely regretful with respect of this oversight.

Best regards

[REDACTED]

▪

[REDACTED]

[REDACTED]

On Wed, Jul 29, 2015 at 3:23 PM, [REDACTED] wrote:

[REDACTED]

I have noted that you have used a different e-mail address on the change of corporate control application form, so I am re-sending the attached letter to this e-mail address to ensure that you have received the letter.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, July 27, 2015 8:56 AM  
**To:** [REDACTED]  
**Subject:** OL 38866 Fame Ventures Limited: Change of Corporate Control

[REDACTED]

Please find attached a letter regarding the change of corporate control for Fame Ventures Limited.

Please respond by 3 August 2015.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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