On the basis of the information received from the 12 Member States that partially exempt providers of certain gambling services, 9 of them allow the exempted lotteries to be performed both land-based and online, while 3 others consider online gambling services as regulated separately and subject to Anti-Money Laundering national provisions.

Regarding the 9 Member States that allow exempted lotteries to offer also online gambling services, 4 are limiting the exemption to either state-owned companies, lotteries that promote a specific social purpose or commercial lotteries used to promote some other good or service provided by the organizer. 2 other Member States explain that specific customer due diligence and the need to report suspicious transactions reports apply to these activities. 2 other Member States explain that these online gambling lotteries services are fully exempted on the basis of the low risk they present. One Member State considers limiting in the future the exemption to land-based lotteries.

As regards the supervision of arcade game owners and operators, 7 Member States did not grant an exemption to the arcade game owners or operators. In one Member State, slot machines are only allowed to operate in casinos, and casinos in all cases fall under the scope of Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) legislation. In 5 other Member States, arcade games and slot machines are exempted, subject to strict requirements, one of these being that the stakes are very low and that those checks can still be carried out.