

Cloud services are a product that uses all or part of an offsite or separate system, device, or piece of equipment to process, monitor, collect or report any transactions.

Division approval is required before a licensee may implement any software*, service or product using cloud services. This applies to products or software using the gaming system or a duplicated environment, such as a mirrored database, to gather, import, monitor, or otherwise collect data. If a licensee is using a cloud service, the licensee is still responsible for the acts and omissions of its agents, employees and contractors in complying with all obligations imposed by law, these rules, and internal controls minimum procedures.

The gaming system licensee must submit the notification and receive approval from the Division in advance of any implementation, or version upgrade to a cloud service.

The notification must be sent to:

DOR_CCBHCasinos@state.co.us (for casinos in Blackhawk and Central City)

DOR_CrippleCreekCasinos@state.co.us (for casinos in Cripple Creek)

When using cloud services all data in transit and data at rest must use at a minimum 128 bit encryption. Data in transit from the cloud service provider's system may employ encryption tunnels, such as a VPN connection, to meet this requirement.

All cloud services must require a login such as, but not limited to, user name and password, tokens, biometrics, or multi factor authentication. Each account created for cloud support or for business use must not have more access than required to do the job.

In the event the licensee loses connection, the licensee must be able to retain all gaming data. If the casino loses connection to the cloud service long enough to cause a significant disruption the Division must be informed within 12 hours. The licensee must inform the Division via email addresses referenced above.

*It is the licensee's responsibility to comply with CLGR 30-1607 (Records Retention). With Division approval, licensees may use cloud service for secondary data retention such as a copy of data or backup and recovery. Please contact the Division for more information.