



PROTECTED
Customer™

A NON-CONFIDENTIAL DESIGN WHITE PAPER

Can protection follow a customer without pooling gambling histories?

Connected protection across online and retail gambling.

A customer can change operator or channel in moments. This paper asks how their verified protection instructions could remain effective across participating services, without giving those services access to one another's detailed gambling histories.

THE PROPOSITION

**A protection check.
Not another operator's customer history.**

Customer-set limits. Cooling-off periods. Self-exclusion instructions.

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The gap is at the boundary.

The issue is not that cross-operator protection does not exist. Great Britain already has multi-operator self-exclusion schemes, including GAMSTOP ONLINE and schemes for land-based settings. They are an important part of the existing protection landscape. [1]

The question explored here is broader: can different, clearly defined protection instructions remain effective when a recognised customer moves between participating operators or between an online service and a retail counter?

CUSTOMER-SET LIMIT

A defined financial boundary. The type of limit, covered activity and time period must be clear.

COOLING-OFF PERIOD

A defined pause. Its scope, start, end and rules for changes must be understood.

SELF-EXCLUSION

An instruction to restrict access. It must not be treated as simply another spending preference.

These are different tools, not interchangeable labels. Before connecting them, participating services would need to agree which instruction applies, to which products, in which setting, and under whose authority.

Connection is not universal coverage.

Participation, reliable customer recognition and agreed rules are prerequisites. Protected Customer™ is not presented as replacing statutory registers or existing schemes, and it cannot protect activity outside participating services.

Two journeys. One continuity question.

These are fictional examples of intended behaviour, not live results. Both the sending and receiving services would need to participate, and the protection's scope would need to cover the activity.

JOURNEY A / ONLINE TO ONLINE

A cooling-off period should not be lost.

01 SET

Alex sets a cooling-off instruction that covers participating online services.



02 MOVE

Alex later attempts to start a session with another participating operator.



03 APPLY

A verified check identifies the applicable restriction before the activity proceeds.

Design question: can the instruction be recognised and applied consistently across services?

JOURNEY B / ONLINE TO RETAIL

A protection check at the lottery counter.

01 SET

Sam sets a limit whose agreed scope includes participating lottery purchases.



02 PRESENT

At a participating shop, Sam presents a phone for recognition before buying.



03 CHECK

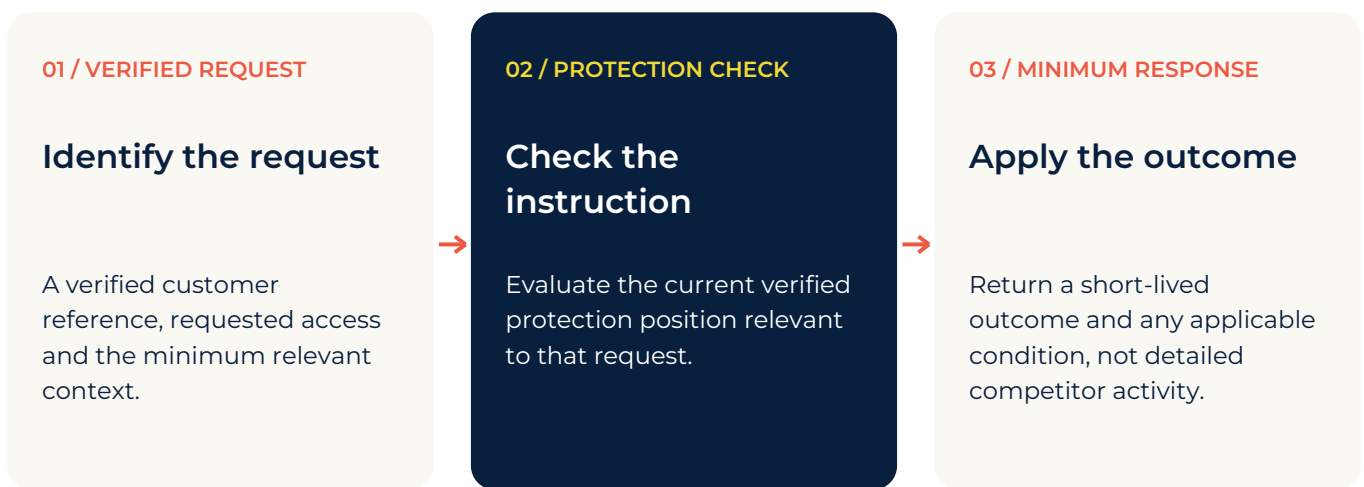
The intended check returns an outcome and any condition for that purchase.

Design question: can this work accurately within a quick supermarket or petrol-station transaction?

Retail integration, response time and accessible alternatives to a smartphone still require development and testing. No existing lottery-terminal compatibility or retailer participation is claimed.

A check, not a shared customer history.

Protected Customer™ is designed as neutral protection infrastructure. A participating operator would request a check and receive the outcome and applicable condition needed for that request. The intended sequence is deliberately simple at the point of use.



What is not the model

No Single Customer View.

No pooled gambling histories.

Participating operators would not receive competitors' detailed customer activity. The intended response is a protection outcome, not a commercial customer profile.

What still needs data

Defined identifiers, protection settings and limited records for authorised checks and audit would still be required. "Minimum response" does not mean anonymous operation, no database or no personal-data processing.

Privacy is a design obligation, not a slogan.

The ICO's data-minimisation principle is purpose-specific. Data roles, lawful basis, necessary fields, access, retention and a data protection impact assessment must be resolved before a live service. A small response alone does not establish compliance. [2, 3]

What would need to be demonstrated?

A convincing demonstration is a starting point, not evidence that the service is safe, effective or ready for operators. A controlled evaluation needs agreed measures, independent challenge and clear conditions for stopping or changing the trial.

01 Protection accuracy

Does the intended instruction reach the correct customer and activity? Measure missed restrictions, incorrect restrictions and changes over time.

02 Operational fit

How long does a check take, including busy periods? Test operator workload, checkout disruption, accessibility and recovery from failures.

03 Privacy and security

Can access and disclosure stay limited to the agreed purpose? Assess identity matching, auditability, retention and appropriate security testing.

04 Customer understanding

Do customers understand what is covered, what is not, and how to correct a mistake? Examine unintended consequences as well as convenience.

05 Responsibility and resilience

Who acts on an outcome, handles an objection or resolves an outage? Test stale instructions, duplicate requests and simultaneous activity.

Continuity alone is not proof of reduced harm.

In February 2025, the Gambling Commission reported that consultation feedback had not identified material new evidence of the harm-reduction effectiveness of cross-operator deposit limits. This reinforces the need to test outcomes, not assume them. [4]

From a design proposition to evidence.

Protected Customer™ has a core system design, a filed UK patent application and interactive consumer and retail demonstrations. It is not a production-integrated or independently validated service.

01 / DISCOVERY

Define the scope, architecture, governance and evaluation with a potential design partner.

02 / ENGINEERING

Build and assess a scoped service; test integration, privacy, security and failure handling.

03 / CONTROLLED TRIAL

Evaluate one online channel first, subject to funding, agreements and applicable requirements.

The proposed first trial would not establish cross-operator or retail effectiveness by itself. Those wider ambitions need further participating services and separate evaluation. Cross-jurisdiction use would also require local legal and operational assessment.

See the design. Challenge the assumptions.

Operators, privacy specialists, researchers and industry partners are invited to discuss a demonstration and what a credible evaluation would require.

protectedcustomer.co.uk | Brad McKay, founder and designer

REFERENCES / SELECT A TITLE TO OPEN THE SOURCE

[1] [Gambling Commission. Multi-operator and national self-exclusion schemes](#). Updated 7 September 2026.

[2] [ICO. Data minimisation](#). Guidance under review following legislative change.

[3] [ICO. Data protection by design and by default](#). Guidance on safeguards and impact assessment.

[4] [Gambling Commission. Cross-operator deposit limits consultation response](#). 4 February 2025; historical consultation position.

Sources checked 15 October 2026. References do not imply endorsement. Company-authored design discussion, not independent validation or legal advice. Existing operator duties, including AML, remain in place.