Denmark

Online casino launch roadmap

Spillemyndigheden (Danish Gambling Authority)

A mature, predictable licensing market where the work is technical: MitID-based player identification, a login check against ROFUS, certified systems, and continuous data feeds to the regulator.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	SETUP COST	LOCAL PRESENCE	DIFFICULTY
Separate licences for online casino and betting…	**6-9 months in practice. The authority states 3 months…**	**28% of gross gaming revenue on online casino and…**	**Application fee DKK 343,300 (single licence) or DKK…**	**EU/EEA-established companies apply directly…**	**Medium to high**

STAGE 1 · Weeks 0-6 — Market and legal feasibility

- Size the market against 28% tax — 1.1
- Pick licence scope — 1.3
- Track Bill L 37 and the 2027 reforms — 1.2
- Fit and proper review of people — 1.4

STAGE 2 · Months 1-5 — Corporate setup and licence application

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- Business plan and internal controls — 2.3
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- MitID player identification — 4.1
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- AML program and risk assessment — 5.1
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STAGE 6 · Months 5-8 — Certification and testing

- Certification programme — 6.1
- ROFUS and SAFE connection tests — 6.3
- RNG and game certification — 6.2
- Evidence export — 6.4

STAGE 7 · Months 8-10 — Go-live

- Licence decision and conditions — 7.1
- Support and complaints handling — 7.3
- Danish front end and legal pages — 7.2
- Staged launch — 7.4

STAGE 8 · From month 10 — Ongoing obligations

- Continuous data and reporting — 8.1
- Recertification on change — 8.3
- Annual fee and duty — 8.2
- Prepare for the 2027 reforms — 8.4

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Denmark: launch roadmap in detail

Spillemyndigheden (Danish Gambling Authority) · as of 2026-11

Licence	Separate licences for online casino and betting (or a combined application), up to 5 years, under the Danish Gambling Act (Spilleloven). A revenue-restricted online casino licence for small offerings was added by Act no. 1780 of 29 December 2025 (fee DKK 700 in 2010 price level, indexed).
Time to launch	6-9 months in practice. The authority states 3 months of casework once all documents are submitted correctly; certification and ROFUS connection testing come on top.
Gaming tax	28% of gross gaming revenue on online casino and betting, paid monthly to the Danish Tax Agency (secondary sources; confirm before relying on it). Bill L 37 (October 2026) reforms marketing and player protection but the sources found do not mention a tax change.
Setup cost	Application fee DKK 343,300 (single licence) or DKK 480,600 (combined) in 2026, indexed yearly, per secondary sources. Annual fee tiered by gross gaming revenue, about DKK 73,200 up to DKK 6.4M. Certification and build costs extra.
Local presence	EU/EEA-established companies apply directly. Others must appoint an approved Danish representative.
Difficulty	Medium to high

1. Market and legal feasibility Weeks 0-6

1.1 Size the market against 28% tax RECOMMENDED

Duty is 28% of gross gaming revenue, due monthly to the Danish Tax Agency, separate from licence fees. The market is smaller than Sweden's, so model unit economics with a flat 28%, a deposit limit at signup and bonus caps. Confirm the current rate with the tax authority, since this guide relied on secondary sources.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline, Ch. 03 Global Market Analysis

1.2 Track Bill L 37 and the 2027 reforms RECOMMENDED

The Minister for Taxation tabled the first reform package (L 37) on 7 October 2026, with phased implementation from January to October 2027. Reported content: continuous player monitoring with duty to intervene, restrictions on welcome bonuses and VIP programs, a ban on turnover-based affiliate deals, and live sports advertising limits from July 2027. Design for these rules now, since the bill could still change in parliament.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 37 Marketing Technology and CRM Systems, Ch. 26 Responsible Gaming and Player Protection Systems

1.3 Pick licence scope RECOMMENDED

Online casino and betting are separate licences, and applying for both together is cheaper than two single applications. A separate B2B supplier licence covers game, platform and bet-processing providers. If you only supply content, the B2B route is the one to read.

In the book: Ch. 06 Licensing Guide, Ch. 05 Differences Between Betting Sites and Online Casinos, Ch. 10b Supplier Integration Control Plane

1.4 Fit and proper review of people RECOMMENDED

Owners, board and executive management must pass fit and proper checks, including a minimum age (21 per a secondary source), criminal record certificates and debt declarations. Start collecting these early, because documents from several countries take time.

In the book: Ch. 06 Licensing Guide, Ch. 09 Legal Framework and Contracts

2. Corporate setup and licence application Months 1-5

2.1 Entity and Danish representative RECOMMENDED

The applicant must be a company. EU/EEA companies apply directly, while companies established elsewhere need an approved Danish representative. If your group sits outside the EEA, plan for a Danish entity or approved representative from the start.

In the book: Ch. 06 Licensing Guide, Ch. 09 Legal Framework and Contracts

2.2 Prepare the application and annexes RECOMMENDED

Apply through the authority's form on the Virk business portal, attach proof of the fee payment, and send annexes through the Bluewhale file system, since the form cannot take large attachments. The annex list comes from the authority's guide for betting and online casino, so work from the current version of that guide.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline

2.3 Business plan and internal controls RECOMMENDED

Expect to document organization, responsible gambling procedures, AML controls and the technical set-up. Spillemyndigheden can revoke a licence if the operator cannot run services in a financially sound, safe and professional manner, so write the controls as things you will actually run.

In the book: Ch. 06 Licensing Guide, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 08 Team Structure and Operations

2.4 Pay the fee and plan the annual fee RECOMMENDED

The application fee must be paid before the case starts. The yearly fee depends on gross gaming revenue bands, so forecast revenue honestly. Fee amounts are indexed each year and the figures in this file come from secondary sources, so check the authority's fee page.

In the book: Ch. 06 Licensing Guide, Ch. 36 Financial Operations

3. Platform and suppliers Months 2-6

3.1 Danish-ready platform scope RECOMMENDED

The platform needs a Danish player identity flow, ROFUS check hooks, deposit limit enforcement, tamper-protected data export to the regulator, and a game catalogue that only contains certified games. Pick or build a platform that already exposes these as configuration, not custom forks.

In the book: Ch. 10 Complete Platform Architecture, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet

3.2 Supplier certification status RECOMMENDED

Every game must be certified under the Spillemyndigheden certification programme before it is offered, so a supplier without a Danish certificate is a blocked supplier. Track certificate id, version and expiry per game in one register.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 17 Random Number Generation (RNG)

3.3 Data location and access RECOMMENDED

The regulator needs access to gambling data on demand and continuous transfer. Decide hosting with that in mind, and note that EU hosting simplifies GDPR but is not itself a Danish rule. Check the authority's technical requirements (version 2.5 from January 2025 was the version found) for current wording.

In the book: Ch. 27 Data Residency and Backup/Recovery, Ch. 29c European Datacenter Infrastructure for Regulated Gaming, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent

3.4 White label route ALTERNATIVE

Operating under a licence holder's licence lowers upfront cost but the licence holder carries the duties, so bonus, ROFUS and reporting obligations will be set by the contract. Read how liability is split before you sign.

In the book: Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button, Ch. 06 Licensing Guide, Ch. 09 Legal Framework and Contracts

4. Identity, ROFUS and responsible gaming Months 3-7

4.1 MitID player identification RECOMMENDED

Players are identified through MitID, accessed via a MitID broker, at a substantial or higher assurance level, and linked to the Danish CPR number. Check ROFUS before issuing a means of identification: if the person is registered, temporarily or permanently, you cannot issue one. Treat the broker as a critical supplier.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 10b Supplier Integration Control Plane

4.2 ROFUS check on every login RECOMMENDED

ROFUS is the national self-exclusion register. Operators must query it at login and deny access to registered players. Web service calls to ROFUS must use TLS 1.3 under technical requirements v2.5. Also suppress registered players from marketing and handle ROFUS being unreachable as a block.

In the book: Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 25b Regulatory Reporting and Evidence Export

4.3 Deposit limits and play controls RECOMMENDED

A player must set a deposit limit before play can start, and chooses daily, weekly or monthly. The operator may not set the amount for them. Add session and loss tools, with reality checks, and keep a change history for audits.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

4.4 Bonus rules RECOMMENDED

One secondary source reports that promotions may not exceed DKK 1,000 and that players must get at least 60 days to meet wagering terms. The 2027 reforms may restrict welcome bonuses and VIP programs further. Check the current bonus executive order before building promotion templates.

In the book: Ch. 37 Marketing Technology and CRM Systems, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

4.5 Duty of care and behavior monitoring RECOMMENDED

Danish rules already require procedures for spotting at-risk play, and L 37 would require continuous monitoring and intervention. Build signals and intervention logs now, since the evidence will be asked for.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 19 Anti-Fraud System Deep Dive, Ch. 34 Data and Analytics

5. AML, payments and tax Months 3-7

5.1 AML program and risk assessment RECOMMENDED

Gambling operators are obliged entities under Danish money laundering rules, supervised by the Gambling Authority for licensed operators. You need a written risk assessment, customer due diligence, monitoring and suspicious transaction reports. The details were not verified from the regulator pages for this file, so confirm with Danish counsel.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 19 Anti-Fraud System Deep Dive, Ch. 02 Regulation and Compliance Landscape

5.2 Payments for Danish players RECOMMENDED

Players expect Dankort, MobilePay and cards. Keep funds traceable per player account and be ready for dispute and chargeback volume under Danish consumer rules.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 33d Disputes, Chargebacks, and Player Support

5.3 Monthly duty return RECOMMENDED

Duty on gross gaming revenue is filed and paid monthly to the Danish Tax Agency. Reconcile the return against the ledger and the SAFE data you send the regulator, so the two never disagree.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation, Ch. 25b Regulatory Reporting and Evidence Export

6. Certification and testing Months 5-8

6.1 Certification programme RECOMMENDED

The gaming system must be certified by an accredited lab under the Spillemyndigheden Certification Programme before use, and the programme requires recurring work (one source cites at least four vulnerability scans and one penetration test a year). Contact an accredited test house at the start of the build, not after.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 32 Testing and QA in Gambling, Ch. 17 Random Number Generation (RNG)

6.2 RNG and game certification RECOMMENDED

RNG and each game must be tested by an approved test house, and the certificate mapped to the game version you deploy. A game change that touches outcome logic needs recertification, so tie release gates to certificate status.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 32 Testing and QA in Gambling

6.3 ROFUS and SAFE connection tests RECOMMENDED

Connection and test of the ROFUS service form part of the licensing controls, and operators must give the regulator access to the SAFE data warehouse using TamperToken security, with continuous transfer. Test with the authority's test environment before the licence is final.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 26b Self-Exclusion Registries: From API to Audit Trail, Ch. 24 Security and Compliance

6.4 Evidence export OPTIONAL

Keep an export that produces the certificates, test reports and scan results in one pack. It speeds up audits and annual recertification.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 24 Security and Compliance

7. Go-live Months 8-10

7.1 Licence decision and conditions RECOMMENDED

The authority issues the licence once the system is certified and controls are in place. Turn each condition into an owned control and put dates in the compliance calendar.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 47 Platform Onboarding: From Contract to First Real-Money Bet, Ch. 40 Case Study -- Launching in a New Regulated Market

7.2 Danish front end and legal pages RECOMMENDED

Danish language, mandatory responsible gambling messages, the licence number, and a visible link to ROFUS and StopSpillet. Marketing rules ban targeting minors and, under L 37, will limit celebrities and affiliates.

In the book: Ch. 37 Marketing Technology and CRM Systems, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent

7.3 Support and complaints handling RECOMMENDED

Support in Danish, a documented complaints process, and escalation to the Gambling Complaints Board as the dispute route. Train agents on exclusion and limit requests.

In the book: Ch. 33d Disputes, Chargebacks, and Player Support, Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 08 Team Structure and Operations

7.4 Staged launch OPTIONAL

Open to a limited set of players first and watch MitID failure rates, ROFUS latency and data feed errors.

In the book: Ch. 33 Operational Playbooks, Ch. 35 Incident Management, Ch. 40 Case Study -- Launching in a New Regulated Market

8. Ongoing obligations From month 10

8.1 Continuous data and reporting RECOMMENDED

Data flows to the regulator continuously through the SAFE system, and operators also send periodic reports. Monitor feed health as a production service with alerts, not a batch job.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 34b Data Governance for iGaming Platforms, Ch. 27 Data Residency and Backup/Recovery

8.2 Annual fee and duty RECOMMENDED

The annual fee is tiered by gross gaming revenue and the duty is monthly. Renewal of a licence takes around three months per the authority, so file in time.

In the book: Ch. 36 Financial Operations, Ch. 06 Licensing Guide

8.3 Recertification on change RECOMMENDED

Changes to platform, games or security architecture can require re-certification. Keep a change classification process tied to the certification programme.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 32 Testing and QA in Gambling, Ch. 47b Configuration and Rules Distribution -- Feature Flags, Jurisdiction Rules, and the Propagation Model

8.4 Prepare for the 2027 reforms RECOMMENDED

If L 37 passes, plan for monitoring and intervention duties, affiliate contract changes, new game variants needing approval, and advertising limits from July 2027.

In the book: Ch. 02 Regulation and Compliance Landscape, Ch. 37 Marketing Technology and CRM Systems, Ch. 26 Responsible Gaming and Player Protection Systems

Common pitfalls

- Issuing a MitID or player id before checking ROFUS. Registered players must not receive a means of identification.
- Offering a game without a Danish certificate. Each game must be certified individually before use.

- Using old fee numbers. Fees are indexed yearly and sources disagree; take the figures from the authority's current schedule.
- Building bonus templates on old assumptions. The bonus rules are tight (one secondary source says DKK 1,000 cap and 60 days to wager) and L 37 may tighten them more.
- Letting the SAFE data feed lag or fail silently. Continuous transfer is a licence condition, so monitor it like uptime.
- Treating ROFUS timeouts as a pass. Block until the check returns.
- Signing affiliate deals on turnover share. L 37 proposes to ban them, so avoid long contracts built on that model.

Sources

1. Application for licence to offer betting and/or online casino (Virk, Spillemyndigheden form 2-01)
   https://businessindenmark.virk.dk/authorities/stat/SPM/self-service/Application_for_licence_to_offer_betting_andor_online_casino_2-01
2. Gambling Maps: Denmark licence guide (secondary source for fees, MitID, SAFE, bonus)
   https://gamblingmaps.org/map/regulations/denmark/for-operators/how-to-get-a-license
3. LCB: Denmark sets 2027 timeline for gambling reforms (L 37)
   https://lcb.org/news/denmark-sets-2027-timeline-for-gambling-reforms
4. Danish Gambling Authority technical requirements v2.5, 1 January 2025 (EU TRIS copy: ROFUS, SAFE, TamperToken, TLS 1.3)
   https://technical-regulation-information-system.ec.europa.eu/en/notification/26292/text/D/EN
5. Act no. 1780 of 29 December 2025 amending the Gambling Act (revenue-restricted online casino licence), Lovtidende
   https://www.retsinformation.dk/eli/lta/2025/1780/pdf

Companion to *The Backend of Luck*. Regulations change; check every figure with the regulator and local counsel before you rely on it. This is engineering guidance, not legal advice.