



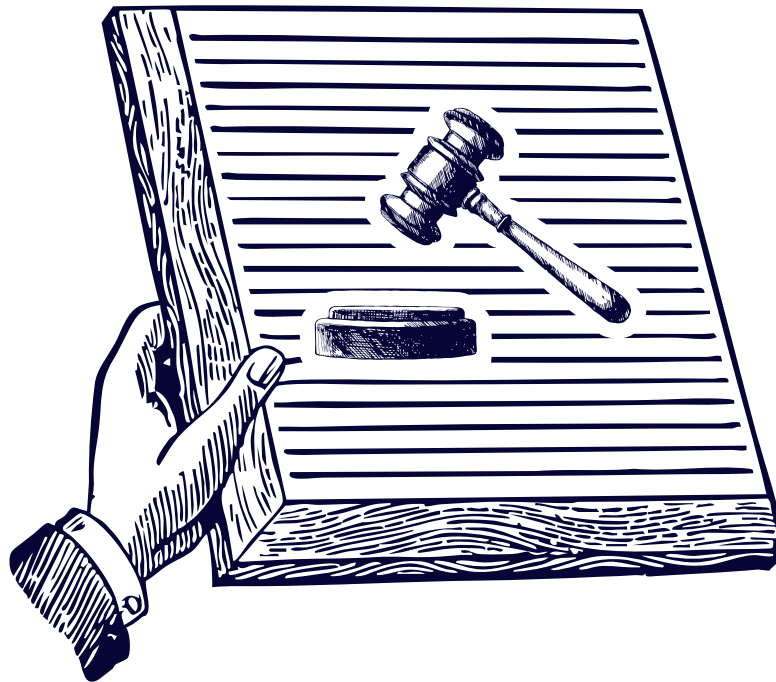
# **The End of the Industry's Workaround: Navigating**

## **Germany's Deposit-Limit & Affordability Reform**



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Germany has some of the toughest online gambling rules in Europe. Since 2021, players have been limited to depositing a maximum of €1 000 per month across all operators. Online slots were further restricted with a €1 stake cap and a mandatory five-second spin delay.

The intention was clear: protect players and push them into the licensed market. But in practice, these measures created new challenges. High-value players drifted offshore, unlicensed operators flourished, and regulated businesses found themselves squeezed between compliance complexity and customer expectations.

Now, change is on the horizon. Between 2024 and 2026, the German regulator (GGL) is reshaping the way affordability is checked. The era of Schufa credit scores is over. The future lies in income-based, real-time verification.



# How the Current Rules Work

Let's start with today's framework:

**The default limit:** €1 000 per player, per month, enforced across all operators via the central monitoring system, LUGAS.

**Higher limits:** €10 000 and €30 000 per month exist on paper, but only under strict conditions.

**Proof required:** Players must show payslips, bank statements, or tax returns as self-declarations don't count.

**Annual re-checks:** Proof of financial capacity has to be provided again every year.

**Monitoring duties:** Operators must actively track high-limit players and report red flags.

**Strict cap on approvals:** No more than 1% of an operator's active players may be approved for a €30 000 limit at any given time.

The reality? Very few players actually qualify. Between the slow gameplay restrictions and the 1% cap rule, the commercial upside of offering higher limits is minimal.

## The End of the Industry's Workaround

For years, operators leaned on Schufa credit checks as a shortcut to approve higher deposit limits. But in April 2024, the Regional Court of Lüneburg shut that door for good.

The court's message was unambiguous:

- ✓ A clean credit score is not proof that someone can afford to gamble more.
- ✓ Only income and assets show real affordability.
- ✓ Operators must collect hard evidence, such as bank data or payslips.

This ruling ended the Schufa workaround once and for all and forced the regulator to build a new framework based on verifiable financial capacity.



# Why Reform Was Needed

Germany's strict rules didn't fully achieve their goals.

- ✓ **Channelisation failed:** Only around 30% of players stayed with licensed operators; most turned to offshore sites without deposit caps.
- ✓ **Addiction experts critical:** Some argued even the €1 000 cap might still be too high for at-risk players.
- ✓ **Operators squeezed:** Strict rules made it nearly impossible to serve legitimate high-value customers while staying competitive.








The result: frustrated operators, frustrated players, and a regulator under pressure to find a better balance.

# What to Expect from 2026

The GGL is rewriting the playbook. From late 2025, new affordability rules will be introduced and codified into treaty law in 2026.

Here's what's coming:

-  **Clearer affordability criteria:** Gambling spend tied to disposable income.
-  **Deposit categories:** €1 000 as standard, €10 000 and €30 000 only under strict documented proof.
-  **Regular checks:** Proof of financial capacity must be resubmitted at least once a year.
-  **Tighter monitoring:** Operators must track and report high-limit players in detail.
-  **The 1% rule:** Only a small fraction of players can ever qualify for the €30 000 tier.

In other words: conditions for higher limits already exist under GGL's Binding Framework. The reforms will formalise them in law and add clarity on how operators must apply them.







# Open Banking: The Smart Way Forward

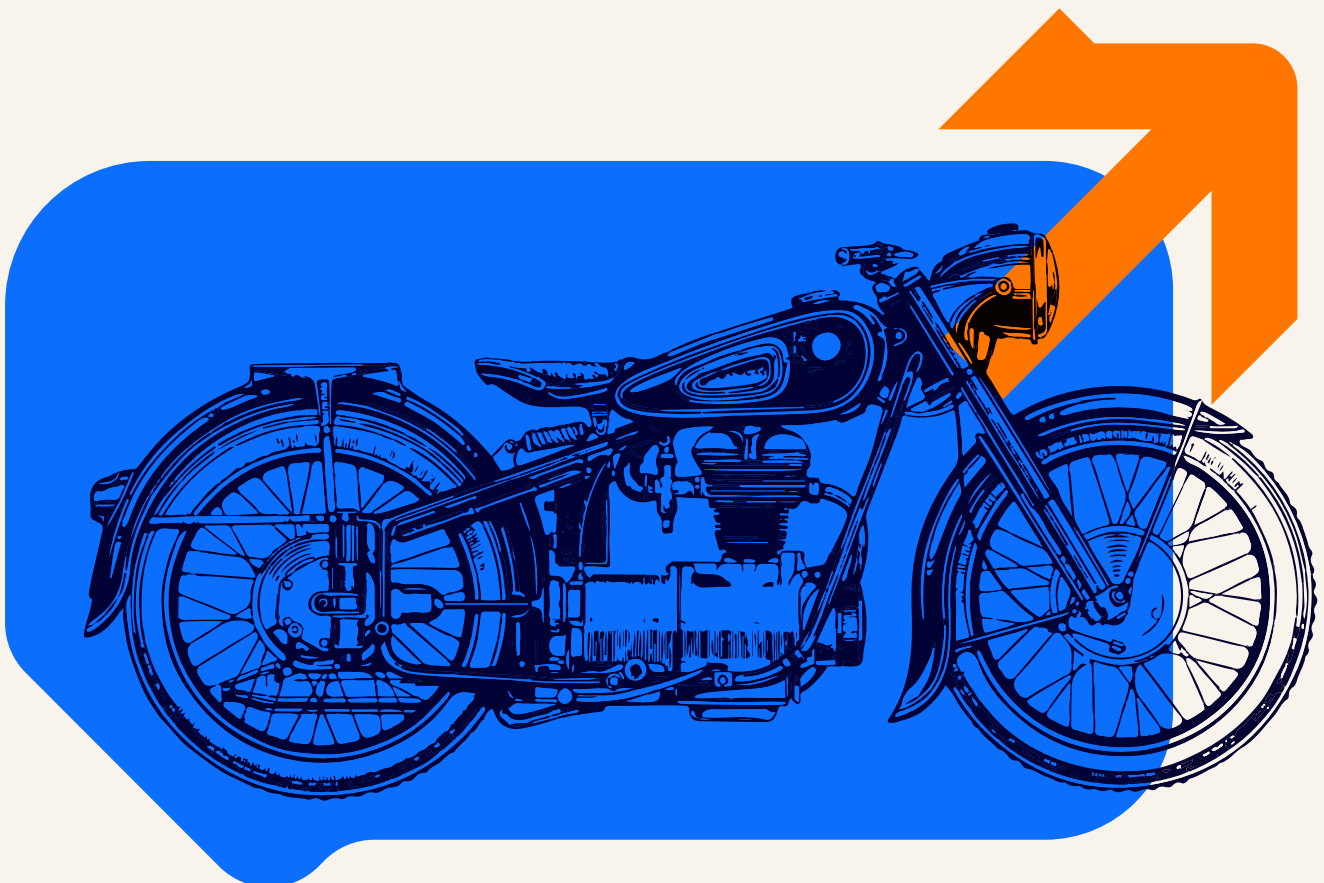
If you're an operator, the big question is: how do you make these checks without drowning in paperwork?

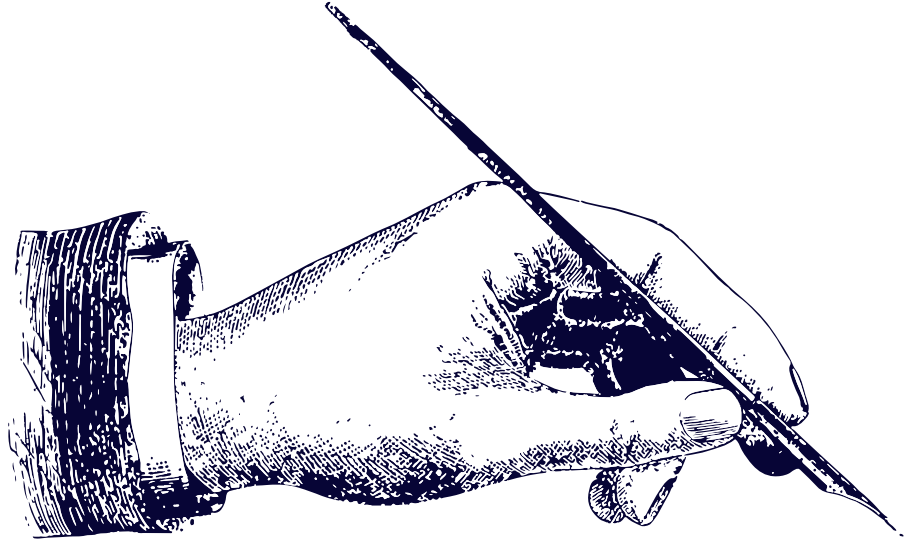
The old way with PDFs, payslips, and self-declarations is slow, intrusive, and unreliable. That's why regulators across Europe are turning to open banking.

Here's why it works:

-  **Instant verification:** Players log in with their banking app, and affordability is confirmed in seconds.
-  **Reliable data:** Income, expenses, and debts are pulled directly from the bank that are tamper-proof and in real-time.
-  **Better experience:** No waiting, no scanning, no endless uploads.
-  **Proven model:** Already in use for affordability checks in the Netherlands, UK, and several other EU markets.








For Germany, open banking is the technology that meets both regulatory demands and player expectations.





## Strategic To-Do List for Operators

Here's how operators can stay ahead of the curve:

-  **Integrate open banking:** Partner with a regulated AISP to securely collect income and expense data.
-  **Update onboarding:** Add an affordability step at registration and when limits are requested.
-  **Automate checks:** Use algorithms to set safe limits (e.g. gambling spend  $\leq$  30% of disposable income).
-  **Monitor high-limit players-** Flag risky patterns and intervene when necessary.
-  **Review your own limits:** Decide your internal caps. Just because €30 000 is allowed doesn't mean you have to offer it.
-  **Ensure compliance:** Follow GDPR and PSD2 rules on consent, data minimisation, and security.
-  **Educate your players:** Explain how limits protect them, offer voluntary tools, and communicate transparently about verification.



# Conclusion

Germany's iGaming market is standing at a crossroads. The days of generic credit scores are over. The future belongs to real-time, data-driven affordability checks.

This is where technology becomes the real game-changer.

By combining AI with open banking, operators can:

-  Verify affordability instantly with secure bank data
-  Continuously monitor risk in real time
-  Automate fair, personalised deposit limits
-  Deliver a smoother player experience while staying fully compliant.



At Kreditz, we bring this future to life. Our Open Banking Affordability Flow turns raw transaction data into actionable insights, using AI to calculate disposable income and recommend safe, personalised limits. It's fast, user-friendly, and designed for the exact challenges operators now face.

The message is simple:

- ✓ The future of affordability checks is AI-driven, real-time, and open-banking powered.
- ✓ Operators who prepare now will not only comply with Germany's new framework but also protect their players and stay competitive in a rapidly changing market.