Marketing Compliance Guide
(UK Market)
Last Update July 2018
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1. **Marketing Compliance**

We take our obligations to legislation, regulation and social responsibility seriously. To remain compliant, it is essential that ALL affiliates read this document and understand how they should promote the Affiliateland brands. Failure to do may result in your account being suspended or terminated as per terms and conditions.

The licence holder is legally responsible for any advertising activity undertaken by its affiliate partners, as defined on the regulations from UK Gambling Commission, Advertising Standards Authority and the Committees of Advertising Practice. As such all affiliate partners are required to display the following information on their websites.

2. **Mandatory Information**

The following information must be included unchanged in any UK bonus promotion.

<table>
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<tr>
<th>Bonus Description</th>
<th>Casinoland.com</th>
<th>Royalslots.com</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Significant Terms</strong></td>
<td>New customers only. Opt-in required. 1st deposit bonus (DB) 100% up to £200. 2nd DB 50% up to £200, 3rd DB 25% up to £200, 4th DB 25% up to £200. 40x wagering, 30 days to complete wagering, game weighting and game restrictions apply. Max Bet with bonus funds £5. Neteller/Skrill deposits excluded, cash balance can be withdrawn at any time.</td>
<td>New customers only. Opt-in required. 1st deposit bonus 100% up to £200. 2nd deposit bonus 50% up to £200, 3rd deposit bonus 25% up to £300, 4th deposit bonus 25% up to £300. 40x wagering, 30 days to complete wagering, game weighting and game restrictions apply. Max Bet with bonus funds £5. Neteller/Skrill deposits excluded, cash balance can be withdrawn at any time.</td>
</tr>
<tr>
<td><em>Link to the T&amp;Cs</em></td>
<td><a href="http://www.casinoland.com/uk/?aid=XXXXX&amp;show=terms">www.casinoland.com/uk/?aid=XXXXX&amp;show=terms</a></td>
<td><a href="http://www.royalslots.com/uk/?aid=XXXXX&amp;show=terms">www.royalslots.com/uk/?aid=XXXXX&amp;show=terms</a></td>
</tr>
</tbody>
</table>

*change XXXXX with your numerical affiliate ID which can be found here:

https://www.affiliateland.com/partners/campaigns.php

3. **Social Responsibility**

Affiliates must display "responsible gambling" links as well as the 18+ warning sign on every page of their website.
4. **Your Website MUST NOT include any of the following**

4.1 Misleading or inaccurate information

Casino reviews and information listings must not include misleading or inaccurate information. i.e. unsupported payment gateways or gaming providers.

All required information for reviews and information listings can be found in the footer links and you can write your own content around that.

4.2 Appeal to children

Content that is likely to appeal more strongly to under-18s than to those aged 18 and over has particular appeal to children and/or young persons. If the content is likely to appeal to both under-18s and adults equally, or more so to adults, then it is unlikely to be considered problematic.

Marketers therefore need to take care with the imagery and wording used in their ads for gambling products or games. Colourful and exaggerated cartoon-style graphics are likely to be considered to have particular appeal to under-18s, as are cartoon animals. Characters from, or similar to those from, children’s TV, films, nursery rhymes and fairy tales are similarly at risk of being particularly appealing to children.

The names of games such as “Piggy Payout”, “Fluffy Favourites”, “Pirate Princess” and “Jack and the Beanstalk”, depending on the context, could also be seen to have particular appeal because they contain elements familiar to children and young persons which may contribute to their appeal to that group.

4.3 Fake winners/Fake RTP

No information about casino or specific game RTP can be promoted. *

No information of player winnings can be promoted. *

*Such information can only be made available from affiliateland.com and only after written permission could be promoted.

5. **Marketing guidance for legal compliance in the UK**

- You must confirm and disclose all marketing channels & sources you are going to advertise our product on to ensure they are compliant with the Affiliateland team.

- On your page there must be sufficient information showing this product is for over 18’s and show sufficient social responsibility information. Example: Gamble Awareness logos and links on each page of your site.

- Give customers clear and obvious information they need to decide if a promotion is right for them.

- You must make sure that any advertisement cannot be considered appealing to children or a vulnerable person.

- To help protect under 18’s and any vulnerable people you are only permitted to use our templated imagery to promote our product.

- If you the ‘Affiliate’ are in any doubt, you must immediately contact the Affiliateland team before engaging in any marketing activity on our behalf, email: support@affiliateland.com

Following these basic guidelines will help ensure you are advertising compliantly.
6. Quick Regulatory Overview

<table>
<thead>
<tr>
<th>All Adverts must be social responsible.</th>
<th>No child or young person under 25 should be featured in any promotions as well as not indecent pornographic and offensive materials, e.g. while using social media to attracts followers, all marketers must take reasonable steps in demonstrating that the ads would not be directed to those under 18.</th>
</tr>
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<tr>
<td>All adverts must advertise where support can be found for problem gambling.</td>
<td>On your page there must be sufficient information showing social responsibility information. <strong>Example:</strong> BeGambleAware logos and links on each page of your site.</td>
</tr>
<tr>
<td>Age restriction.</td>
<td>The age restriction warning sign (18+) must always be displayed on all adverts, banners and campaigns.</td>
</tr>
<tr>
<td>Make sure any qualifications and limitations are clear.</td>
<td>Qualifying text (small print or footnotes) can be used to clarify a claim in an ad but don’t use it to hide important information or in a way that contradicts the headline claim.</td>
</tr>
<tr>
<td>Customer’s benefit must be taken into consideration.</td>
<td>Deposit(s) required to qualify must be made clear within the communications (terms and conditions), this must relate in the offer advertised. If there are any non-optional charges/costs you must include these separately in the terms.</td>
</tr>
<tr>
<td>Customer has consented to details being provided to third parties</td>
<td>We ask to for consent to pass details to third parties for marketing and name those third parties.</td>
</tr>
<tr>
<td>Opt-out option must be made available on email or SMS communications.</td>
<td>An opt-out / unsubscribe option must be available for those who are not interested in emails, bonus or SMS offers. Affiliates should seek approval from Affilateland before sending any SMS or Email marketing.</td>
</tr>
<tr>
<td>Have the evidence to back up claims.</td>
<td>Before the ad is run you must hold adequate evidence to support all objective claims or those that are capable of objective substantiation.</td>
</tr>
</tbody>
</table>

7. Regulatory Compliance Guidelines

To make sure you remain compliant, see below guidelines from to avoid non-compliant advertising, as defined by Advertising Standards Authority, UK Gambling Commission and Committees of Adverting Practice.

7.1 All adverts should be socially responsible

No child or young person under 25 should be featured in any promotions as well as no indecent, pornographic and offensive materials. e.g. while using social media to attract followers, all marketers must take reasonable steps in demonstrating that them ads would not be directed to those under 18.

7.2 All adverts should advertise where support can be found for problem gambling

On your page there must be sufficient information showing social responsibility information. **Example:** BeGambleAware logos and links on each page of your site.

7.3 Age restriction

The age restriction warning sign (+18) must always be displayed on all adverts, banners and campaigns

7.4 Don’t omit key information

All relevant communications must be obvious and identifiable that this is an “Ad” and that you are advertising for One Click limited.

All significant conditions for an offer must be made clear in the ad itself (if space is permitted). These should be stated in or by the ad. The full terms and conditions should be no more than on click away.

7.5 Make sure any qualifications and limitations are clear

Qualifying text (small print or footnotes) can be used to clarify a claim in an ad, but don’t use it to hide important information or in a way that contradicts the headline claim.
7.6 **Customer’s benefit should be taken into consideration**
Customers level of gambling should be within proportion in terms of any offers/incentives available.

7.7 **Make sure terms about required deposits are clear**
Deposit(s) required to qualify should be made clear within the communications (terms and conditions), this should relate to only the offer advertised. If there are any non-optional charges/costs you must include these separately in the terms.

7.8 **Customer has consented to details being provided to third parties**
We ask for consent to pass details to third parties for marketing and name those third parties.

7.9 **Opt-out option must be made available on email or SMS communications**
An opt out/ unsubscribe option should be available for those who are not interested in emails, bonus or SMS offers.

7.8 **Have the evidence to back up claims**
Before the ad is run you should hold adequate evidence to support all objective claims or those that are capable of objective substantiation.
8. **Significant terms for ads limited by time and space**

These are mandatory for all promotional material. Below are examples and the casino websites should be regularly checked to ensure your significant terms are current.

a) **Age permitted**

+18, over 18’s only

b) **Targeted players**

New players only / Existing players only / Selected players only

c) **Deposit info**

No deposit required / Min deposit £xx / Max deposit £xx

d) **Info about offer and promo codes**

1st deposit bonus 100% up to £xxx. 2nd deposit bonus 50% up to £xxxx, 3rd deposit bonus 25% up to £xxx, 4th deposit bonus 25% up to £xxx. / 10% cashback on losses up to £xxx /

e) **Wagering requirements (if applicable)**

Examples: xxX Wagering requirement

f) **Start date (if applicable)**

Offer starts from on xx.xx.2018

f) **Expiry information**

xx days to complete wagering / xx-day expiry on Free Spins / Offer expires on xx.xx.2018.

g) **Info about bet limitations**

Min bet £xx / Max bet £xx when playing with a bonus.

Neteller/Skrill deposits excluded from match deposit bonus.

h) **Deposit and withdrawal information**

Your cash balance and associated winnings (from the cash balance) can be withdrawn at any stage. If you wish to withdraw your cash balance you will be required to forfeit your bonus balance.

i) **Game restrictions**

Different wager weighting for some games incl. Table Games and certain Slots.

Bonus funds or spins can be played on specific games only.

j) **Info about additional terms**

Affiliates should display the text “Bonus Terms Apply”. To make sure affiliates don’t miss out on players, under the “Campaign” section of Affiliateland you will find tracking links that will display bonus terms and conditions on entry to the casino site.
9. **Legislation and regulatory bodies**

Affiliateland.com affiliates must comply with all laws, regulations and industry practices applicable to online advertising and the marketing of online gambling sites, including but not limited to:

  a) the UK Gambling Act 2005;
  b) the Licence Conditions and Codes of Practice (LCCP) issued by the Gambling Commission;
  c) the CAP Code and guidance documents issued by the Advertising Standards Authority;
  d) the IGRG Industry Code for Socially Responsible Advertising;
  e) the PECR Regulations issued by the Information Commissioner’s office.

By engaging in marketing activity on behalf of Affiliateland.com, affiliates agree that all activities undertaken will uphold the highest ethical standards, including the licensing objectives set out in the Gambling Act 2005:

  a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
  b) ensuring that gambling is conducted in a fair and open way;
  c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

9.1 **The UK Gambling Commission (UKGC)**

All advertising of gambling products and services should be undertaken in a socially responsible manner. Affiliates should comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) which apply to the form and media in which they advertise their gambling facilities or services. Affiliates should also follow any relevant industry code of practice on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

Advertisers should also have regard to the CAP ‘[Guidance on the rules for gambling advertisements](https://www.asa.org.uk/)' which contains a specific section on ‘Misleadingness’: ‘free bets’, or any equivalent guidance that either body may issue in future.

9.2 **Advertising Standards Authority (ASA)**

The ASA is responsible for publishing marketing guidance for the gambling industry as well as dealing with complaints made against wrong/inappropriate advertising. The rules in this section apply to all marketing communications for gambling products.

9.2.1 **Social responsibility and harm**

The Code requires all gambling advertising to be socially responsible. Advertisers must respect the need to protect children, young persons and other vulnerable persons from being harmed or exploited by advertising that features or promotes gambling.

9.2.2 **Children and young people**

Marketing communications for gambling products must be socially responsible, with regards to the need to protect children, young persons and other vulnerable persons.

Advertisements must not exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or another vulnerable person and should not be likely to appeal to them. No-one who is, or seems to be, under 25 years old may be featured in gambling advertising.
9.2.3 Seduction, sexual success, enhanced attractiveness and personal qualities

Ads must never link gambling with seduction, sexual success or enhanced attractiveness. It is acceptable to feature attractive people in ads, as long as the ad as a whole does not link gambling with seduction, sexual success or enhanced attractiveness. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and enhanced attractiveness, improved self-image or self-esteem. Ads linking transformations of characters’ appearance, image or other qualities after gambling can imply that gambling could result in enhanced attractiveness and an improvement in self-image.

9.2.4 Problem gambling behaviour and taking priority and solving problems

Suggesting that gambling is a solution to debt and financial concerns or an alternative to employment is socially irresponsible and a breach Social Responsibility rules. It is generally acceptable to show gambling as being important and interesting to characters, as long as it is not to the exclusion of other activities or interactions with people.

9.2.5 Misleadingness

Marketing communications must state all significant limitations and qualifications. These must always be prominently displayed with an advertised offer. Marketing communications that are limited by time/space must include as much information about significant terms as practicable; online ads must also direct consumers to a source where the full terms are stated, which must be no further than one click away from the ad.

In media where it would not be possible to immediately display the full terms, a prominent and clear direct link to the full terms of an offer must be included.

The following list contains significant conditions which are likely to apply to all promotions; these include:

- How to participate, including any costs or factors likely to influence consumers’ understanding of the promotion;
- Any free entry route explanation;
- Start and closing date (if applicable);
- Any proof of purchase requirements;
- The nature and number of any prizes or gifts, or a reasonable estimate if the number cannot be determined;
- The existence of any restrictions or limitations, i.e. age, date or geographical restrictions;
- Any limitations of availability; and
- Unless obvious, the promoter’s name and address.

9.3 Vulnerability

Affiliates must consider if marketing campaigns might affect vulnerable groups, and ensure that communications do not contain content likely to cause harm. The ASA assesses marketing communications on a case-by-case basis. In line with the focus of this guidance, certain marketing approaches are likely to have a disproportionate impact on problem gamblers and those at risk of problem gambling. GambleAware defines problem gambling as behaviour related to gambling which causes harm to the gambler and those around them.
This may include family, friends and others who know them or care for them. If someone is struggling to control their gambling behaviour it can cause stress, depression, anxiety, or they may fall behind at work and worry about money. If someone’s gambling is causing any of these effects, it is considered problem gambling.

The ASA will have regard to the vulnerability of groups when considering complaints. For instance, the evidence strongly suggests that younger men (aged 18-34) are at heightened risk of irresponsible gambling behaviour. The ASA might consider that this factor is relevant when assessing complaints under rules such as 16.3.10 (gambling as a rite of passage) that are in large part focused on protecting younger people. At the same time, the ASA will have regard to vulnerabilities affecting individuals, groups of whom may be disproportionately represented in an audience. These include economic constraints, limitations on the capacity to understand information, mental health issues and engaging in riskier patterns of play.

9.4 Erroneous perception of risk and control

Marketing communications must avoid approaches that give erroneous perceptions of the level of risk involved or the extent of a gambler’s control over a bet or gambling in general. Implying that an activity is without risk, portrayals of risk that are unrepresentative or placing undue emphasis on the extent of control afforded by a facility like ‘cash-out’ are likely to encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm. They would therefore breach these rules.

9.5 Impulsiveness and urgency

In order not to encourage irresponsible gambling behaviour, marketing communications must not unduly pressure the audience to gamble, especially when gambling opportunities offered are subject to a significant time limitation. Offers subject to significant time limits and promotions with short term expiry dates (whether linked to an external event or set by the operators themselves) should not be presented in such a way that creates an unjustifiable sense of urgency. In such instances, urgent calls to action (for instance, “Bet now/Deposit now”) or creative approaches, such as those that place emphasis on time running out, are likely to be regarded by the ASA as a breach of these rules because they could pressure consumers into participating when they otherwise would not. Reminding consumers that other time-limited promotional offers are due to expire is likely to be acceptable.

9.6 Trivialization

Affiliates must take care to avoid approaches that trivialise gambling and avoid the impression that the decision to gamble should be taken lightly. For example, they should:

- not encourage repetitive or frequent participation;
- Not encourage people to gamble more than they otherwise would;
- Exercise caution when encouraging people to take advantage of promotions or opening accounts; and
- Not encourage people to spend more than they can afford.

9.7 Problem gambling behaviour and other indicators

Marketing communications that portray individuals displaying problem gambling behaviours or other behavioural indicators linked to problem gambling are likely to be regarded by the ASA as a breach of the CAP Code rules. Direct problem gambling behaviours include chasing losses, losing track of time while gambling and protracted play. Other behaviours associated with people displaying or at risk from problem gambling include:

- Mood swings (including, highs and lows, irritability and shortness of temper);
• Manipulative, dishonest, disruptive, secretive or evasive behaviour;
• Detachment from surroundings;
• Preoccupation with gambling; and
• Isolating oneself from others or avoiding other activities to spend more time gambling.

10. ASA Guidance and Codes
The ASA has provided guidance for each section explained above. Please refer to the links below for further information:

▪ CAP Code
▪ CAP Code 16 Gambling Section
▪ Guidance on Advertising and Social Responsibility
▪ Advertising of Free Bets and Bonuses

11. Information Commissioners Office (ICO)
The ICO’s PECR (Privacy and Electronic Communications Regulations) govern electronic marketing messages and contain specific rules on marketing calls, emails, texts and faxes. Regulation 22 states that electronic marketing communications can only be sent to individuals who:

• Have specifically consented to receiving such communications (opt-in);
• Are an existing customer who bought (or negotiated to buy) a similar product or service in the past, and have been given a simple way to opt out both when their details were first collected and in every message subsequently sent to them. Electronic marketing communications must also provide a valid contact address to customers, so, they can opt out or unsubscribe. This rule applies to emails, texts, picture messages, video messages, voicemails, direct messages via social media or any similar message that is stored electronically.

Additional points of consideration:

• Marketing databases must have been acquired lawfully, with specific and obvious content given to market the receiver of the correspondence.
• Self-excluded customers must be removed from all marketing databases immediately
• Customers who choose to opt-out of marketing must be removed from the database with immediate effect
• All marketing material must be clearly identifiable as such, and details of the marketer (the Affiliate) must be clearly presented in the advert.

Marketing guidance and checklist;


12. Summary
Affiliateland and One Click Ltd, the licence holder, are legally responsible in the eyes of UKGC/ASA/CAP for all affiliate activity. In signing up to Affiliateland and agreeing to the terms and conditions, you are required to adhere to the above guidelines. Failure to do so can result in warnings, suspension and potentially termination of your affiliate account.