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## 1. Introduction

PlayToro Partners Marketing Guide is designated to outline the regulations requirements that PlayToro Partners affiliates have to comply with in order to advertise its brands. Those guidelines will be revised in compliance with the regulations of each license PlayToro Partners holds, namely:

- UKGC (United Kingdom Gambling Commission)
- MGA (Malta Gaming License)
- Spelinspektionen (Swedish Gambling Authority)
- Spillemyndigheden (Danish Gambling Authority)
- DGOJ (Spanish Gambling Authority)

Should you have any questions about the guidelines, restrictions, or in doubt regarding your obligations, please contact your affiliate manager at [affiliates@playtoropartners.com](mailto:affiliates@playtoropartners.com).

## 2. General Guidelines

### 2.1 Age Restrictions

- Advertising to minors is strictly prohibited in any form and capacity. If this is undertaken in any form, your account will be terminated. Affiliates are not allowed to place any tracking Links, banners or creatives in any fashion on pages of the affiliates website aimed at persons under the age of 18 years or otherwise target, whether directly or indirectly, such persons for gambling-related services.

- Gambling advertising must not appeal to minors in any way. This includes both the messaging and especially the imagery used. Examples include the use of games named after popular children’s fairy tales, books, TV series and movies for promotional purposes.
- Under no circumstances are minors to be featured in advertising.

Affiliates must place in all promotional material both the 18+ logo, and for the UK – also begambleaware.org logo. These logos must be placed in the following:

- Website footers
- Social media cover Images
- Social media - in all posts, cover photos and “about” sections
- Affiliate ads and banners of all types and sizes.
- In selecting media, affiliates must take appropriate steps when planning their campaigns to understand the likely audience of media where they intend to place ads. They should also take steps to exclude under-age groups from an audience where tools to do so are available.

## 2.2 Marketing Restrictions

You must make sure that information published in relation to PlayToro Partners’ brands, must meet the following criteria:

**2.2.1 Player reviews.** If your website allows people to review products or services, you should publish all genuine, relevant, and lawful reviews. You should also make sure that your processes to collect, moderate and publish reviews do not hinder this.

### **2.2.2 Misleading advertisement.**

- Misleading advertising, especially advertising that contains inaccurate statements regarding the chances of winning or the type and amount of the prizes, is prohibited.
- Affiliates must make sure that all offers that are used in their ads are up to date. Promoting an expired offer is considered a misleading advertising. It is affiliate's responsibility to update all offers once communicated by the Affiliate Manager. Failure to comply will result in account closure. Updating an offer includes:
  - The actual offer itself
  - Significant Terms
  - Any review pages created on the brand in question

**2.2.4 Advertising Games Results.** In advertising, the results of games of chance must not be presented as capable of being influenced by the player.

**2.2.5 Excluded Players.** You must undertake reasonable endeavors to exclude customers with an active self-exclusion or cool-off period from its paid campaigns. Contact the Affiliate Manager via [affiliates@playtoropartners.com](mailto:affiliates@playtoropartners.com) to learn what you can do to comply with this requirement.

**2.2.6 Socially Responsible Advertising.** Our affiliates agree to promote our brands in a socially responsible manner, by complying with the industry’s regulations, codes of practice and guidelines to ensure that all Advertising of our brands, games, and associated promotions is clear, transparent, and not misleading. It extends and is not limited the following:

- Must not encourage anti-social behavior (this includes portraying gambling with the consumption of alcohol).
- Must not suggest that gambling can be a resolution to social, educational, personal, or professional problems.

- Must not suggest that gambling can be an alternative to employment, a solution to financial concerns or a form of financial investment (e.g. "A life-changing win!").
- Must not portray gambling as Socially Attractive.
- Must not portray gambling in a context of toughness or link it to resilience or recklessness.
- Must not portray gambling as indispensable or as taking priority in life, for example over family, friends or professional or educational commitments.
- Must not suggest peer pressure to gamble or disparage abstention from gambling (e.g. "Play Now!" "What are you waiting for?" "Hurry Up!" and similar messaging).
- Must not suggest that skill can influence the outcome of a game that is purely a game of chance.
- Must not exploit cultural beliefs or traditions about gambling or luck.
- Must not suggest that solitary gambling is preferable to social gaming (e.g. "Bored at home? Play with us!").

### 2.2.7 Custom Creatives

Any creatives used to promote the Brand must be taken from the Affiliate Account. It is not allowed to use any custom creatives. The usage of own creatives may lead to affiliate account suspension. This is to ensure that we can safeguard everybody's interests with your Communication(s) being legally compliant.

### 2.2.8 Domain Names / URLs

It is not allowed to register any domain names which include either of PlayToro Partners brands names. Any Affiliate who registers domain names in breach of this rule will have their account suspended pending an investigation.

## 2.3 Marketing Channels

### 2.3.1 PPC Campaigns

- Any search advertisement must clearly contain 18+ messaging in the ad copy. For the UK market the message must also include safer gambling messaging within the core ad format. The safer gambling message can be "Play Responsibly" which is short and simple. It's possible to use a different responsible gambling message (subject to approval with your Account Manager).
- In case you are running PPC campaigns in search engines, you are required to ensure that no gambling advertising will be served against the keywords included in the enclosed "Industry wide negative keyword list".

### 2.3.2 Social Media

- Facebook and Twitter have their own guidelines regarding the advertising of gambling products. For example, if promoting gambling through a Twitter handle, an 18+ statement (or 21+ in some jurisdictions) must be included in your bio.
- Any sponsored or paid ads must target the audience of 25 years old and up. This is done to prevent minors from seeing gambling content as social networks cannot prove they can fully block this type of users from gambling ads.
- Any links posted by Affiliates on Facebook, Twitter and other relevant social media channels, links to the Affiliate's own website in the first instance, which in turn should contain links to PlayToro Partners website. It must be clear that the social network that a player visited does not belong to PlayToro Partners and is not the official channel of our Brands.

### 2.3.3 YouTube

Organic YouTube content and/or your own YouTube channels must be age-restricted to 18+ to ensure users log in to age-verified accounts in order to view content.

### 2.3.4 Mobile Apps

Any Affiliates who are releasing apps into the app store must ensure that the app name does not feature any of PlayToro Partners brand names. Any Affiliate found to have released an app including any brand name, will be asked to remove the app immediately and may result in account termination.

### 2.3.5 Push Messaging

Due to the limited amount of space in push messages, it is not allowed to add any offer details as there is no space for terms and conditions. Message text needs to be clear and generic.

#### ***Compliant Example:***

"New customer offer at PlayToro - View Here for Full Details. T&C's Apply."

#### ***Non-Compliant Example:***

"Get started at PlayToro with a 100% Welcome Bonus, plus get 25 Spins on Top!"

### 2.3.6 SMS

- SMS must contain an opt-out option and include details to opt-out.
- Each SMS must contain the following text:  
18+, Ts&Cs Apply

### 2.3.7 E-mail

- Each e-mail must be approved by your Account Manager before it goes out to players.
- Mailer banner must have text "Read Below for Ts&Cs" and full Promo T&C's must be added on the bottom of the mailer
- Mailers must have 18+ icon, and a text line "Always Play Responsibly"

## 2.4 Content Restrictions

It's not allowed to use misleading words in the ads, such as "Risk Free", "No Risk", "Safe bet", "Free Money", "No lose", "Extra Money". It must be clearly stated that what players receive is a bonus.

## 2.5 Design Restrictions

No child appealing or overtly sexual images/game images are allowed on any Acquisition marketing/ The logged-out casino website and Partner affiliate sites.

## 2.6 Market Restrictions by License

### 2.6.1 Marketing Restrictions in the UK (UKGC)

#### \* **Regulations Logos**

All marketing materials (including affiliate website, mailers, banners) must include the following logos:

- 18+
- Gambling Commission (linked to <https://www.gamblingcommission.gov.uk/>)
- BeGambleAware.org (linked to <https://www.gambleaware.co.uk/>)



These must be clearly visible on marketing offers. They must not fade into the background or be too small to see. 18+, BeGambleAware.org

#### \* **Content Restrictions**

- **Urging / Pushy Statements** - It is forbidden to use any urging statements such as “play now” or “play immediately”, “Bet Now”, “Start Playing”, “Try Now”, “Play”, “Bet”. Call for action buttons should say “Register” or “Read More”.

- **Statements of promising nature** - Forbidden: Statements of a promising nature for example "This may be your chance to win big! Are you ready?!", "Try your luck in our casino!" and "Don't miss any of it, do not miss your bonus as a new player"

#### \* **Promotional Terms and Conditions (T&C's)**

Whenever there is an offer and a Call-To-Action leading to PlayToro Partners brands, it must contain significant terms and conditions of the promotion in full.

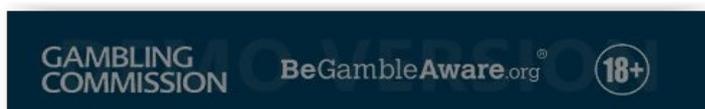
It's a must to use all T&C's in full as it's provided by your Account Manager and cannot be altered in any way without prior written approval of your Account Manager.

In case the space is very limited (e.g. the offer is presented on a small banner), it's a must to make sure that the banner has the phrase “Ts&Cs Apply” and when a player clicks on it, he will be landed on an appropriate landing page where full promotional terms and conditions are stated (promotional T&C's in this case have to be not more than one click away from the offer itself).

It is forbidden to direct players from the banner that does not have full promotional T&C's stated, directly to the registration form.

#### \* **E-mails**

Along with the regular requirements for e-mail campaigns, e-mails going out to UK players must contain the following icons:



## 2.6.2 Marketing Restrictions in Germany

### \* **Content**

- **Restricted Words** - The use of the term's "casino" or "casino games" is not permitted in connection with the organisation and sale of virtual slot machine games or in advertising for such games
- You can't have the word 'casino' written in a different format, e.g Kasino, Qasino, Cesino, C@asino. Any wording similar to the word will be completely prohibited.

### \* **Design**

- **Table Games Elements / Jackpots** - Any images / creatives cannot contain any elements related to table games, such as: roulette, blackjack tables / elements, any kinds of live casino, jackpots games, jackpot amounts/total jackpot amounts.

### \* **Marketing**

- **Restricted Regions** - We are not allowed to target Schleswig-Holstein state in Germany.
- **Restricted Games** - Live Casino/Table Games/Jackpot Games are no longer permitted (i.e. Blackjack, Roulette, Baccarat, Live Casino games in general etc').
- **Logo / Tagline** - Brand logo and / or tagline cannot contain the word "Casino" or any similar spelling of this word (Kazino, Kasino, etc).
- **Ads on TV, Radio, Internet** - It's not permitted to run this type of ads between 6 a.m. and 9 p.m.
- **Advertising Winnings**. Games of chance must not be presented as a solution to financial problems.
- **Advertising Games Results**. In advertising, the results of games of chance must not be presented as capable of being influenced by the player

## 2.6.3 Marketing Restrictions in Sweden (Spelinspektionen):

### \* **Content**

- **Urging / Pushy Statements** - It is forbidden to use any urging statements such as "play now" or "play immediately" "Bet Now", "Start Playing", Try Now", "Play", "Bet". Call for action buttons should say "Register" or "Read More".
- **Statements of promising nature** - Forbidden: Statements of a promising nature for example "This may be your chance to win big! Are you ready?!", "Try your luck in our casino!" and "Don't miss any of it, do not miss your bonus as a new player".
- **No marketing / pushing / incentivizing** - We must make that **we do not market in any form to the Swedish Market**. You cannot use any marketing or content that would entice a player to deposit.
- **Attracting attention** - Must not use any kind of intrusive marketing that is intended to attract particular attention.

Examples:

- pop-ups and take-over adverbs which covers the entire screen of the website and where the consumer must actively remove the advert in order to be able to access the content.
- Claims like "Are you looking for excitement?" followed by the button "Yes God dammit"
- and "HELLO!?! NEW CASINO!" followed by the button "You are likely to try"

### \* Marketing

- **No Offers Market** - We must make that we do not market in any form to the Swedish Market. You cannot use any marketing or content that would entice a player to deposit.
- **Fast Payouts or similar statements** - We cannot have any references to "Fast Payout" or similar statements.

### \* Logos

- Spela ansvarsfullt. Hjälp? Gå till [www.stodlinjen.se](http://www.stodlinjen.se) - as a hyperlink



Spela ansvarsfullt. Hjälp? Gå till [www.stodlinjen.se](http://www.stodlinjen.se)

## 2.6.4 Marketing Restrictions in Denmark

### \* Content

- **Word "Gratis" (Free)** - Make sure the word "GRATIS" does not appear on any marketing offer. If a deposit is required to get free spins or a bonus...then the offer is not free.

### \* Marketing

- **Stop.Spillet Icon** - Stop.Spillet - The Stop.Spillet logo should not be altered in any way (design/color etc.) <https://prnt.sc/v7phz1>
- **ROFUS Icon** - Website and Mailers must contain the ROFUS icon - Danish Gambling Authority's register of self-excluded persons <https://prnt.sc/v7qwdv>

### \* Marketing Offers on Different Mediums

- **Large Banners - Landing Pages/Home Page/ Welcome Offers, Own Websites/ Social Media Pages - 18+, Stop.Spillet , Rofus, Significant Ts&Cs.**  
**Option1** : If you prefer to include the respective logos of ROFUS & StopSpillet, the DGA requires that a short description of the logos as to what each organization offers/does. The Stop Spillet and Rofus logo should not be altered in any way (design/color etc.).  
**Option 2**: If you do not want to add the logos, you can use the following: Begræns Onlinespil | rofus.nu - Hjælpe linje | StopSpillet.dk +45 70222825. These need to be hyperlinked.
- **SMS** - 18+, V&B gaelder, SMS Opt Out Details
- **Push Notifications** - V&B gaelder
- **Mailers** - 18+, Stop.Spillet, Significant Ts&Cs. If a player has to scroll right to the bottom to see the significant Ts&Cs for an offer, please add "Read Below for Ts&Cs" below the deposit/play now CTA button in the body of the mailer.  
Logos at the bottom of the mailer:  
**Option1** : If you prefer to include the respective logos of ROFUS & StopSpillet, the DGA requires that a short description of the logos as to what each organization offers/does. The Stop Spillet and Rofus logo should not be altered in any way (design/color etc.).  
**Option 2**: If you do not want to add the logos, you can use the following: Begræns Onlinespil | rofus.nu - Hjælpe linje | StopSpillet.dk +45 70222825. These need to be hyperlinked.

- **Pay Per Click Ads** - 18+, V&B gaelder

### \* **Logos**

- These must be clearly visible on all marketing offers, in mediums considered to be of unlimited space. The mediums considered of unlimited space are Own Websites/Mailers/Social Media Pages. They must not fade into the background or be too small to see:



## 2.6.5 Marketing Restrictions in Spain

### \* **Marketing**

- **juego seguro Icon** - Any marketing materials presented to players must contain a "play responsibly" icon - juego seguro logo <https://prnt.sc/v7qwnr>
- **Large Banners - Landing Pages/Home Page/ Welcome Offers Banners** - 18+, Juego Seguro Significant Ts&Cs "Bono sujeto a condiciones" Bonus Policy Link.
- **SMS** - 18+, Bono sujeto a condiciones, SMS Opt Out Details.
- **Push Notifications** - Bono sujeto a condiciones.
- **Pay Per Click Ad** - 18+, Bono sujeto a condiciones.
- **Mailers** - 18+,Juego Seguro, Significant Ts&Cs, Bono sujeto a condiciones incl Bonus Policy Link. If a player has to scroll right to the bottom to the see the significant Ts&Cs for an offer, please add "Read Below for Ts&Cs" below the deposit/play now CTA button in the body of the mailer.
- The logos below must be added to all mailers:



### \* **Logos**

- These must be clearly visible on marketing offers. They must not fade into the background or be too small to see.

