

Marketing Guidelines for Affiliates



Introduction

In these Guidelines, reference to “**Communication(s)**” is to any and all marketing, promotional, advertising or other similar material of yours used to encourage consumers to sign-up to one or more of our participating gambling websites as partnered with you.

We have reviewed and condensed the applicable law, regulations and codes of practice into this helpful guidance note. Please read this document carefully and ensure that you are fully compliant now and in the future at all times.

All of our affiliates agree and are required to promote our brands in a **socially responsible** manner, in full compliance with all applicable laws, regulations, codes of practice and guidelines to ensure that any advertising of our brands and games, and associated promotions is **clear, transparent and not misleading**.

It’s imperative that you read these Guidelines carefully and in full. As an affiliate, we rely on you to exercise the **correct level of control over your marketing Communications**. Whilst we appreciate that you are an integral aspect of our business, this needs to be balanced with the heavy regulation being applied to operators. This has also been due to recent Advertising Standards Authority (“**ASA**”) rulings with affiliates failing to apply with multiple provisions of the CAP Code (available here: <https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>).

We aim to ensure that our business and partnership with you **develops sustainably into the future**. However, this will only be as a result of your compliance and continuous assistance in ensuring that all Communications are in accordance with the law. Unless this happens, we will not be able to commit to you as an affiliate, nor support our affiliates program in the long run.

We firmly believe that, **together**, we can maintain and continue to grow our affiliates network.

Should you have any queries, then please feel free to contact us at **affiliatecompliance@21affiliates.com**.

Thank you for your understanding and continued support.

Key Requirements

1 Do **not create your own, or amend in any way whatsoever, creative media** supplied to you unless you have received our prior written consent to do so. Any amendments to our creative media is in breach of your Affiliate Agreement with us. You must not create your own promotional banners, images or otherwise unless you receive our prior written consent. This is to ensure that we can safeguard everybody's interests with your Communication(s) being legally compliant. If you wish to use text or other materials that are not supplied to describe, advertise or promote our brands and games or any of its offers or services then you must obtain our written approval prior to any publication of it.

2 **Do not change promotional landing pages** (or otherwise). The landing pages are absolutely crucial to legal compliance given that they contain the full terms and conditions applicable to your Communication. Any changes to these links will result in the Communication itself no longer being valid or compliant. The links must not be changed and customers must not be taken to alternative pages.

3 Do not display or place digital adverts on **copyright infringing websites**, such as movie streaming or piracy websites. These are websites that contain illegal content, such as a Torrent Download webpage, or those that enable you to illegally stream 'Live TV' or movies, such as Putlockers. The PIPCU has a website with an updated list of these banned websites. To obtain access to this list of banned websites, please email pipcuantipiracy@city-of-london.pnn.police.uk and access shall be granted. Failing that, and should you have any concerns, then please contact us for confirmation as to whether a particular website is banned or not.

4 Do not display, direct or place Communications anywhere there is **gambling advice or corrective behavioural content**.

5 Do not **spam** recipients or send **unsolicited emails** (or otherwise). You must prove where you have received express consent from your intended recipients, mailing list etc. If you don't have this consent, then immediately remove the recipients from your database.

6 Do not display, advertise or (directly or indirectly) **promote our Company Brand** (White Hat Gaming and/or Branders) as part of your Communication. This must relate back to *your business* as an affiliate and only refer to Casino Brands/ games themselves.

7 You must ensure that you **keep an accurate record** of the websites, media accounts, channels and otherwise as to where you are sending, displaying or advertising Communications. We will require continued access to review such records to ensure that we can satisfy ourselves of our Regulatory obligations. You therefore can only use Communications in places and channels you have disclosed to us and we have not rejected. Any changes must be sent by way of email to us at **affiliatecompliance@21affiliates.com**.

8 Any and all Communications must **not** be displayed, targeted or appealing to those under the age of 18. This includes the **form and content** of your Communication, such as including **child-like imagery, colours or choice of wording**. The UKGC are committed to ensuring that no Communications are of appeal to those under the age of 18, and we must all ensure that we do not create or edit Communications that have such appeal. This also applies to any form and content of your **website or online presence**.

Information Communications and Data

Any data that you hold relating to an individual must have been collected, processed and stored in accordance with the law. You should keep **clear explicit records** of what a person has consented to, and when and how you got this consent, so that you can demonstrate compliance in the possible event of a complaint. We reserve the right to view such records to satisfy ourselves of your compliance.

If you send an email or other form of Communication, you must ensure that the **commercial intent is made clear and obvious to the recipient, together with your true and real identity**. In addition, any Communication that you send out must include a link to **"opting out", "unsubscribe" or similar**- and you are obliged to honour the same. You must not make this opting-out process be difficult, at cost, or otherwise.

Additionally, any email should make clear reference to you in the "From" box. In other words, there should be no confusion as to the true identity of the sender of the email. The **Subject must refer to the Email Content**, and not be misleading. It should not be written in a form of "click-bait".

Remember, if you use any creative media that we supply for email campaigns, you must not alter these whatsoever unless you have received our prior written consent to do so.

Should you wish to create your own direct marketing campaign, then you must obtain our prior written consent before commencing with it.

Social Media

If you choose to use Social Media for your Communications, you must:

- 1) Clearly show the **'Over 18' logo** in all Communications and on your Account Profile itself; and
- 2) Include wording around **BeGambleAware** on your social media accounts, such as "*Gamble responsibly. www.begambleaware.org*"; and
- 3) Include a **link where further gambling guidance and advice can be found**, such as "*Further details on responsible gambling can be found at www.begambleaware.org*"; and
- 4) Be able to **show and prove** that your Communications are **targeted and displayed to those above the age of 18**. For example, with Twitter, you must use their age-screening function when marketing Communications to consumers, or 'checking' the age restriction option when uploading content to YouTube. Similar options apply to other social media platforms; and
- 5) Be careful around the **choice of images and words that you may use in any non-promotional material** that is submitted from your social media account. For example, a "Facebook Post" that is not intended as an advertisement but relates to gambling.

Please ensure that you read, review and satisfy yourselves of the **policies** of the respective social media company. For example, Facebook requires real-money gambling-related Ads to be pre-approved before release. The above applies to YouTube channels and any other form of online or social sharing.

Before using Social Media, you must **disclose to us, in writing, as to which platforms you are using, and a link to your profiles**. This applies to any platforms that you might choose to use in the future as well. Failure to inform us of these details now, **or as they change**, may lead to immediate termination of your Agreement. We require these details to continually review and monitor your Communications via Social Media.

Critical Points and Tips:

- If in any doubt, **ask**. We have a dedicated Compliance team who will be happy to answer or resolve any Communication queries that you may have.
- Do not change any **creative media**, or create your own campaigns (or similar) without our prior written consent.
- **Test** the click-through on any Communication to ensure that it places the consumer on the correct landing page, which includes all details of the offer, including full terms and conditions. If you are unsure, then do not publish the Communication and please contact us.
- Always give an option to **opt-out** from any form of Communications and ensure that this is a simple, easy process for the recipient to follow. You must honour these requests, not delay in the unsubscribing process, and no longer send any Communications to that individual.
- If your Communications refer, review or compare a competitor or other brand, ensure that you can verify and validate any claim you make, or make clear that any content is a matter of opinion only, or otherwise simply request our written consent to such content.
- If you are unsure as to whether or not your advert comes across as an advert, entitle it "Ad" or similar so there can be **no confusion** to the consumer.
- Keep a close eye on any **updates** that we (or others) provide in relation to affiliate compliance. The law and applicable regulations are moving and changing continuously and we encourage you to stay updated on any and all changes that are made as a result of regulatory decisions or guidance notes.
- Use your commercial endeavours to retain **the best standards on your website**. Remember, you must promote socially responsible gambling and must display "Over 18" signage. You must ensure that you are not accepting traffic or otherwise be of appeal to those under the age of 18.
- Use your best endeavours to ensure that only those above the age of 18 can view your Communications, such as via **age-targeting on Social Media** or by ensuring that the **form and content of your Communications has a more mature appeal**. If you are unsure, then do not include it, or request our prior written consent before publication.
- Familiarise yourself with the **Social Media policies** (and any other online policies that apply to your Communications) to ensure that you are fully compliant:
 - Facebook: <https://www.facebook.com/policies/ads/>
 - Twitter: <https://support.twitter.com/categories/284>
 - YouTube: <https://www.youtube.com/yt/policyandsafety/policy.html>