

SGA Marketing Guidelines

General guidelines

The **overall impression** of the marketing must be considered. What matters is **the way the message is perceived by the consumers**, not the way the advertiser/company intended for the message to be perceived. In general, the marketing also needs to be **objective, balanced, reliable, true, and provable**.

Information mandate

Specific information that must be apparent in the marketing:

- **Age limit:** The age limit required to gamble must be clearly stated (18+).
- **Support organisation:** Contact information to an organisation that provides information about and support in relation to gambling must be clearly stated. The organisation should be independent of the gambling business and be able to offer free help based on Swedish conditions. The Swedish Consumer Agency recommends "Stödlinjen". Some form of supplementary information should be provided, such as telephone number, web address or e-mail address. This requirement does not apply to radio messages (though it still applies to podcasts).
- **T&Cs apply:** The terms and conditions relating to the specific bonus, tournament etc must be clearly accessible in all forms of promotional material, as well as the term "T&Cs apply".
- **Responsible Gambling message:** For example, "*Spela Ansvarsfullt*" (Play Responsibly).

Moderate marketing

The marketing must be "moderate". Below *are some* examples of what has been considered *not moderate* and other checks to make sure that the marketing is moderate:

- That marketing does not include claims that gaming can provide a **solution to financial concerns**, an **alternative to employment**, a way to earn a livelihood of financial security
EX: Statements such as "Nämen du behöver ju inte jobba. Du kan ju bara spela (Well, you won't have to work. You can just gamble)", "Jag tycker bara det är otroligt konstigt att du jobbar (I just think it's incredibly strange that you work)" or "Varför inte låta magen jobba för dig? På casinot (Why not let your stomach work for you? At the casino)".
- That marketing does not contain **pressuring messages** such as "you must", "you have nothing to lose" or "come now".

EX: Swedish Consumer Agency: Statements such as "Spela nu (Play now)", "Spela direkt (Play immediately/directly)", "Satsa nu (Bet now)", "Pröva lyckan (Try your luck)", "Börja spela (Start playing)", "Du lär ju testa (You should try)", "Prova nu! (Try now!)" are considered pressuring messages.

However, statements such as "**Läs mer** (Read more)" and "**Till Registrering** (To Registration)" have been deemed OK.

Statements such as "**Det här kan nog vara din chans att vinna stort! Är du redo?! (This may be your chance to win big! Are you ready?!)**", "**Testa lyckan i vårt casino! (Test your luck in our casino!)**" and "**Missa inte allt det här, Missa inte din bonus för nya spelare (Don't miss all this, do not miss your bonus for new players)**" are also considered to be pressuring messages.

- That the marketing is **not intrusive** or **intended to attract particular attention**.

EX: Pop-up and take-over advertisements that the consumer cannot fend off and that cover the entire screen of the website that the consumer wants to access.

*Statements like "**Söker du spänning?** (Are you looking for excitement?)" followed by the button "**Ja för tusan** (Hell yes)" and "**HALLÅ!?! NYTT CASINO! (HELLO!?! NEW CASINO!)**" follow by the button "**Du lär ju testa!** (you will want to test!)" are also considered to be intended to attract particular attention.*

- That the marketing does not contain claims of **quick payments**. Even if the information is correct, it still has to meet the moderation requirement.

*EX: "**UTTAG INOM 5 MINUTER (WITHDRAWALS WITHIN 5 MINUTES)**", "**Snabbare utbetalningar! (Faster withdrawals!)**", "**Blixtnabba uttag (Lightning fast withdrawals)**", "**Fria uttag och pengar på kontot inom 5 minuter (Free withdrawals and money in the account within 5 minutes)**".*

- That marketing does not contain claims that gaming can provide a **solution to social, personal or professional issues**.
- That marketing does not portray **gaming as necessary**, or as a **priority in life** e.g. ahead of family, friends, education or professional commitments.
- That marketing does not portray gaming as a **path to social success**, for example by using well-known individuals with suggestions that gaming has contributed to their success.
- That marketing does not contain claims that gaming itself **entails** – or can **enhance** – positive **personal qualities**, e.g. that gaming can improve consumers' self-esteem, self-respect or result in recognition or admiration.
- That marketing does not represent gaming in a context that **links gaming with strength or irresponsibility**.
- That marketing does not convey **degrading views of moderate gaming**.
- That marketing does not **promote** gaming behaviors where consumers **lie about their gaming**.
- That marketing does not promote gaming behaviors where consumers **borrow money to gamble**.
- That marketing does not promote gaming behaviors where a **consumer thinks more about gaming** than what the consumer really wants.
- That marketing does not advocate for or encourage consumers to **chase past financial losses**.

- That marketing does not advocate for or encourage consumers to **chase past financial losses**.
- That marketing does not encourage gaming with **money that consumers cannot spare**.
- That marketing does not encourage or promote **criminal or asocial behavior**.
- That marketing does not play on **stereotypical** notions of **male** and **female**.

Misleading information

The marketing must be reliable and not misleading. Below follow *some* examples of what has been considered misleading information and checks when making sure the marketing is not misleading:

- That marketing is not **designed in a way that misleads** the consumers.

EX: Information about bonuses must be correct. Information indicating several bonuses are available has also been considered misleading, since the SGA's bonus rules don't allow it.

- That marketing is never designed to suggest or indicate that gaming is **risk-free**, or that there are products that cannot lead to problem gambling.
- That marketing does not contain **false information** about the **size of the winnings**.
- That marketing of **previous winners** or winnings is not **incorrect** or **false**.

EX: Stories about previous winners must be correct.

- That marketing does not exaggerate the chances of winning or suggest that a player is **guaranteed to win**.

EX: "Jag hann inte ens blinka.. (I didn't even have time to blink..)", "Det sa bara swoosh! (It just said swoosh!)", "Jackpottarna bara stiger och stiger. Casinot söker med ljus och lykta efter svensk vinnare, kolla och ta chansen! (The jackpots only rise and rise. The casino is looking for a Swedish winner, check it out and take the chance!)"

- That marketing does not contain claims or suggestions that the outcome of a draw in a game of luck is dependent on or can be affected by anything **other than chance**.

EX: "Så utnyttjade de tekniken för att vinna storvinsterna.. (They used their skill to win the jackpot ..)"

- That marketing does not portray the game to be a **quick/faster path to winning**.

EX: "Vann supervinst – pengar på kontot på 7 minuter (Won the super jackpot – money in the account in 7 minutes)"

- That any conditions for participating in a marketing activity or for accessing offers (including supplementary benefits) are **clear** and **accessible to the consumer** in a manner appropriate to the distribution and marketing channel, allowing the consumer to make an **informed decision** about his/her gaming.

- That information on each type of gaming product and game is provided in terms of win frequency and/or prize plan, if applicable to the product, and the share of bets that is paid to players in the form of winnings (RTP share).
- That the **sender is clearly identifiable** in all marketing. This also means that clear marketing labeling must be part of collaborations with influencers and bloggers and when purchasing editorial content, unless otherwise stated in applicable legislation, such as the Radio and TV Act.
- That it is **not suggested** by the marketing that it is **possible to gamble anonymously** or without registration for games that require registration under the Gambling Act.
- That the marketing cannot be confused with advertising for **gaming companies/brands that do not have a gaming license**.
- That the marketing does **not encourage exaggerated gambling**.

EX: "The more you play the more you win ...", "She lost hundreds but continued and became a millionaire..", "Från pank till 122 000 kronor på några timmar (From broke to SEK 122 000 in a few hours)", "Marias intuition gav resultat. Hon förlorade hundralappar men fortsatte (Maria's intuition yielded results. She lost hundreds but continued)"

- That the marketing is **not addressed to – or designed to appeal specifically to – persons under the age of 18**. This rule also applies to "marketing which by its design allows it to be assumed that children and adolescents especially notice and can be affected by it". The overall impression is decisive.
- That the marketing is not otherwise **unclear, incomprehensible, ambiguous or inappropriate**.

Bonus offers

- **Information about bonuses must be correct.** Information indicating several bonuses are available has also been considered misleading, since the SGA:s bonus rules don't allow it.
- **Clear reference to conditions of bonus.** The reference should, as a rule, mean that the consumer can access the conditions with no more than one click of the button. The information should also not be embedded in long and linguistically inaccessible texts. The reference should also not be difficult to read due to text size, colour scheme or placement.

Illegal and unwanted sites

- Gaming company logotypes must not appear on sites that are illegal, such as **illegal streaming sites**, or on sites that otherwise contribute to an image of the gaming industry that we do not want to be associated with, such as **pornography**.

Elec Games verdict: Phrases confirmed illegal

a) **"Knepet sprids som en löpeld: kan fylla kontot på 5 minuter"** (The trick is spreading like wild fire: can fill the account in 5 minutes)

b) **"Vinstpengarna på bankkontot på fem minuter – helt utan registrering"** (The winnings in your bank account in five minutes – completely without registration)

c) **"Blixtsnabba utbetalningar"** (Lightning quick payouts)

d) **"Här är klockrena vägen till guld"** Difficult to translate (This is the clear way to the gold)

e) **"Så kan du ta hem miljoner utan registrering"** (This is how to bring home millions without registration)

f) **"Vinsten på banken inom 5 min"** (Winnings in your bank account in 5 min)

g) **"Så kan du ta hem miljoner på väg till jobbet"** (This is how you can bring home millions on your way to work)

h) **"Så utnyttjade de tekniken för att vinna storvinsterna"** (This is how they exploited the technology win big)

i) **"Spela om miljoner – helt utan registrering. Succétaktiken"** (Play for millions – completely without registration. The tactic for success)

j) **"Vann supervinst – pengar på kontot på 7 minuter"** (Won a super winning – min in your account in 7 minutes)

k) **"Fråga bara den lyckliga storvinnare som tog hem drömvinsten på 1,2 miljoner kronor. Inom fem minuter fanns hela vinstbeloppet på hans bankkonto – redo att användas"** (Ask the happy big winner who brought home the dream winning of 1,2 million crowns. Within five minutes the entire amount was in his bank account – ready to be used)

l) **"Det betyder att du kan ha hunnit med en riktig storvinst – och fått in pengarna på banken – från att du lämnade hemmet till att du kommer in på jobbet"** (It means that you can have time for a really big win – and get the money in your bank account – from when you leave your home to when you get to work)

m) **"Det är tack vare den här smarta tekniken som allt går så enkelt och lätt hos Ninja Casino – och lämnar mer tid över att spela om de riktigt höga summorna. En man från Värmland tog t.ex. hem en total vinst på 704 700 kronor efter att ha börjat spela hos Ninja Casino. Det är verkligen en pengasuccé"** (It is thanks to this smart technique that everything is so simple with Ninja Casino – and leaves more time to play for the really big sums. A man from Värmland brought home total winnings of 704 700 crowns after playing with Ninja Casino. It's a real money success)

n) **"Alla gillar snabba cash. Speciellt när man spelar casinospel. Och inget går snabbare än hos Ninja Casino"** (Everyone likes quick cash. Especially when you play casino games. And nothing is quicker than Ninja Casino)

o) **"SPELA NU!"** (PLAY NOW!)

p) **"SPELA DIREKT utan registrering"** (PLAY IMMEDIATELY without registration)

q) "250 spel med chans på miljontals kronor är bara ett klick bort. Vad väntar du på?" (250 games with a chance for millions of crowns is just a click away. What are you waiting for?)

r) "Inget telefonnummer eller mejladress behövs. Ge dig in i jakten på miljonerna redan idag – spela direkt med din mobila bankinloggning här" (No phone number or email address is required. Head into the chase for the millions today – play immediately with your mobile bank login here)

s) "Gör som vinnarna hos Ninja Casino – spela direkt med mobil bankinloggning" (Do as the winners at Ninja Casino – play immediately with mobile bank login)

t) "Låt ninjorna visa vägen till miljonerna. Ingen registrering krävs – vinsterna kan du ha på kontot inom 5 minuter" (Let the ninjas show the way to the millions. No registration required – you can have the winnings in your account within 5 minutes)