

## **HERO GAMING MARKETING GUIDELINES** for Affiliates

### **1. General**

The primary duty of gambling operators and any third-party marketing partners which we engage is to act socially responsible and to ensure consumer fairness. We expect our marketing partners to take proactive and pre-emptive steps in identifying potential issues when creating and distributing sales promotions and advertisements. These Guidelines specifically address some of the legal and regulatory obligations and requirements that must be complied with, and which originate from several regulatory, legislative or industry standards, including without limitation (and as updated, amended or restated from time to time);

#### *Sweden*

- (a) The Swedish Gambling Act and subsidiary regulation
- (b) Notifications and clarifications of the Swedish Gambling Authority
- (c) Rulings of the Reklamombudsmannen and Konsumentverket

#### *Malta*

Remote Gaming Regulations 2018 and subsidiary legalisation

#### *All markets – Data Protection*

- (a) e-Privacy Directive
- (b) The General Data Protection Regulation

Please note that these guidelines are not exhaustive and the affiliate must at all times comply with applicable law and regulation even if the rule or restriction is not specifically stated or listed in these guidelines.

### **2. General Principles**

The following areas warrant particular attention and consideration when marketing gambling products:

- (a) Direct marketing shall only be sent to customers for which the affiliate has a valid consent and who are not excluded from gambling;
- (b) Sales promotions should always be clear and accurately advertised;
- (c) Adverts should not indirectly feature themes that link gambling to toughness, resilience, and recklessness;
- (d) Adverts should not give the impression that gambling can be a primary source of income or an answer to the payment of debts;
- (e) Always be aware as to the social responsibility, such as ensuring that adverts and promotions don't encourage gambling in ways that might harm or exploit children, young people, or vulnerable adults.

### **3. Inclusion of Socially Responsible Information**

All marketing communications sent to customers must include information on responsible gaming and what help is available to customers who may be experiencing gambling problems.

All ads should contain information about the fact that underage gambling is illegal. No advertising or additional marketing information, whether relating to specific offers or gambling generally may appear on any primary web page/screen or microsite that provides advice or information on responsible gaming.

### **4. Guidelines for the Marketing of Offers**

Terms and conditions for bonus offers should be easily accessible and must be clearly defined to the customer in the ad. Marketing communications must state significant limitations and qualifications and link to the source where all conditions of the promotion are prominently stated.

Examples where an offer potentially will be non-compliant include:

- (a) The promotion does not provide supporting information on the terms and conditions of the offer, or gives it with insufficient prominence for example only visible once scrolled down;
- (b) When clicked, advertising banners take a customer directly to the join or login section of the website, without providing terms and conditions of the offer;
- (c) Significant information may only be available 'below the fold' on a web page, or email and a customer may only be aware that terms and conditions apply if they actively scroll to the end of a webpage or similar.

## **5. Direct Marketing Guidelines**

### *Self-Excluded Players*

Players who have self-excluded shall not receive direct marketing. Upon self-exclusion, the customers will be flagged as closed / inactive, and the direct marketing system is configured to disregard all inactive accounts when sending marketing materials automatically. If any error is received in the use of this system, this must be immediately reported to compliance who can conduct an incident assessment and proactively report the incident to the relevant regulators.

### *Consent*

Direct marketing must not be sent to customers without permission and customers should be able to withdraw consent by clicking on "unsubscribe" links in emails in their account at any time. Affiliate must not contact customers with direct electronic marketing without their informed and specific consent. Hero ensures that customers are removed from direct marketing databases using an automated system which does not market to customers who have not given or who have withdrawn consent. If any error is received in the use of this system, this must be immediately reported to compliance who can conduct an incident assessment and proactively report the incident to the relevant regulators.

## **6. Social media**

Our logotypes and advertisements may not appear on sites that are illegal or in violation of good practice, such as unlawful movie streaming sites, or on websites that otherwise contribute to an image of the gaming industry that we do not want to be associated with, such as pornography. Alongside the general guidelines, the following specific guidelines apply

- (a) Social responsibility requirements and age requirements on consumer-facing marketing content on YouTube channels must be followed. Age restriction shall apply to all direct marketing video uploads to YouTube. This can be done simply by 'checking' the age restriction option when uploading content via <https://support.google.com/youtube/answers/2950063?rd=1>
- (b) Twitter and Facebook age-screening function must be used.

## **7. Sweden-specific Guidelines**

For any marketing in Sweden, the affiliate commits to adhere to the detailed Guidelines issued by the trade associations. The current version is available here: <http://www.bos.nu/wp-content/uploads/2019/03/BOS-and-SPER-Marketing-Guidelines-2.1.pdf>.

Additionally, the following applies:

### *Support organisations*

All marketing must include a prominent link or phone number to [www.stodlinjen.se](http://www.stodlinjen.se) where customers can take a test identifying gambling problems.

### *No direct marketing*

Marketing via email and SMS is NOT allowed at all without prior approval. For any approved email and SMS marketing, the following applies.

- (a) Marketing may not be sent via email or text to an individual who has not consented to receive the communication.
- (b) Marketing must include an opt-out link and any opt-outs must be respected.
- (c) Marketing may not be sent to anyone who has registered with spelpaus.nu.

*Specifically prohibited statements:*

In addition, and as further guidance connected to the rules above, the following statements are expressly forbidden. Please note that this is not an exhaustive list and any third-party marketing partners are expected to keep abreast of regulatory developments concerning what statements can be made.

- (a) Any references to “no account,” “no registration,” or similar.
- (b) Any references to speed or specific time references concerning deposits or withdrawals.
- (c) Any urging statements such as “play now” or “play immediately.”
- (d) Any references to Hero’s Swedish license which are presented as an award or something unique in the market.

*Bonus*

Bonuses must only be available to customers upon acquisition of the customer (“Welcome Bonuses” only), and Welcome Bonuses must be available to all customers on the same terms.