

Marketing Policy for Swedish Players/Sweden Market – SuprPlay Ltd/SuprNation Group

V1.2, June 2019.

As of January the 1st, 2019, a new gambling regulation has come into force - see the new law in Sweden pertaining to gambling (2018: 1138) [here](#).

SuprPlay Ltd & the SuprNation Group complies with the Sweden Gaming Act (2018:1138), the Swedish Marketing Act (2008:486), including all relevant marketing rules pertaining to its Swedish gambling licence. This also includes instructions from Konsumentverket (the Consumer Agency in Sweden) in terms of marketing in a compliant manner in Sweden, the SPER/BOS guidelines (annexed hereto), and TU's gambling recommendations: <https://tu.se/tu-in-english/>. Please see below for more information.

A) General Marketing Concepts for Sweden including TU's Recommendations

The monopoly of gambling is suspended and replaced by a licensing system where all - state and private, Swedish and foreign gambling companies, that fulfill the license terms may be allowed to manage gambling. The gambling law also introduces a requirement that all **marketing should be moderate.**

In order for the gamble ads to be considered moderate, the ads should:

1. in a correct and balanced way present the chances of winning so that they do not create the impression that the chances of winning are greater than they actually are. Any unfounded statements about the chances of winning or how much one can win shall be prohibited (and

hence statements such as “the jackpots keep on growing” or “the casino is looking for the next winner” are not allowed.

2. not communicate the image of gamble as socially attractive;
3. not especially address to children or adolescents who have not reached the age of 18;
4. not be formulated by using well-known people, suggesting that the participation of people in games has contributed to their success;
5. not give the impression that participation in gambling is a solution to financial problems or an alternative to work or construed as a form of financial investment or that this can improve the gambler’s social status and should not give the impression that a gamble offer is free;
6. not contain statements about gambling as a solution to social and economic problems;
7. **not urge excessive gambling or in any way put pressure on people to gamble;**
8. not contain statements that gambling is risk free;
9. not contain gender discriminatory statements;
10. not feature individual winners without documented evidence;
11. not target vulnerable groups of people;
12. **not** include taglines such as “fast and simple”, “It just said swoosh”, “I didn’t even blink”.

Marketing should not contain pressuring expressions such as “you have to”, “you have nothing to lose” or “come on”. We also should not use terms or statements which call upon a player/user to take an action such as “play now” or “play here”, “start playing now”, “play directly” or “bet now”, however the phrase “click to play” on relevant buttons in ads or on websites is construed as being informative and is acceptable. The Consumer Authority in Sweden has also found phrases such as “fast/faster/fastest payouts” or “the profit in the bank within five minutes” to be a breach of moderate and compliant marketing, and so

similar phrases are also to be avoided. Such taglines must also not imply that there is no need for a customer to register nor have a gambling account.

- The following phrases are therefore also prohibited in Swedish: “snabbare utbetalningar”, ”blixtnabba uttag”, ”uttag inom 5minuter”, ”pengar på kontot inom 5min”, ”Spela nu!”, ”Spela Direkt”, ”Satsa Nu”, ”Pröva Lyckan”, ”Börja Spela” or “slipp registrering”, “valkomstkista”.
- On the other hand, permissible phrases can be: “Läs mer” (read more), “Till Registrering” (to registration) and any other similar phrases that are informative instead of imperative. Also these phrases are also permissible: “enkel registrering” and “utan krånglig registrering”.

Additionally, marketing ads should:

13. be ad labeled very clearly;
14. very clearly state any sponsorship, for example in the case of branded content;
15. be very clear, understandable and factually correct and displaying any relevant T&Cs (no further than one click away);
16. state **contact information for an organisation that provides information about and support in connection with gambling issues. Please note here that the “Stodlinjen” logo (or any other suitable organization) is not enough – there must be contact details for players to use should they wish. For digital ads, please note that the word “Stodlinjen” should link to Stodlinjen’s website which shows the contact details therein;**

17. provide distinct information about minimum age to gamble – and hence **the plus 18 sign** should be on all banners/campaigns etc. and **marketing not aimed specifically to anyone under 18 and hence no children in the ads themselves or anything that could be deemed to appeal specifically to minors;**

- For media houses it is important to keep track of which companies are licensed and these are presented on an updated list at Spelinspektionen. Please see: <https://www/lotteriinspektionen.se/Licensansokan/bolag-med-spellicens/>
- Gambling ads that do not meet the above recommendations should be rejected – whether these are **our own ads (direct marketing), via media houses/agencies, or via our affiliates.**
- One should also note the general prohibition in terms of marketing on any third party website which hosts/features any unethical content or illegal services such as illegal streaming or piracy websites, any adult sites including dating websites and similar, or any other websites wherein this would constitute any sort of infringement of law or other private rights of third parties.

B) Self-Excluded (“SE”) Players

- **No marketing communication or content is to be sent to any self-excluded players;**
- Note that **on registration and every login** a check against SE players on SuprPlay’s sites (voodoo dreams.com; nyspins.com; duelz.com) and also against the Swedish National Database i.e. Spelpaus.se. (the site on which players can self-exclude directly and nationally);
- Hence prior to sending out any marketing communication, checks will be made towards the Spelpaus register prior to sending any marketing to players. If the answer returned

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is a YES (denoting the player is SE on Spelpaus) then no marketing may be sent out to that player. Ensure this is as immediate as possible and **no later than 48 hours after the check.**

- In terms of checks in terms of whether a player is SE on any SuprPlay sites, please note that if a player self-excludes on 1 site, they will automatically be self-excluded for the same duration on our sister sites. Hence no marketing should be sent out to these players, at least within 48 hours of their having self-excluded, and further ideally within 24 hours or as immediate as possible;
- Finally please note that if a player has closed their player account (excluding self-excluded accounts here), we may direct marketing at the player only if the player actively approved such in conjunction with the account closure.

C) General Prohibitions for Affiliates/Marketing Agencies

Affiliates or third party marketing agencies therefore may **NOT**:

1. Send marketing to self-excluded customers (whether SE was made via SuprPlay site/s or via the National Self-Exclusion Register (Spelpaus));
2. Send marketing to anyone under 18 or marketing aimed specifically at minors/children or omit the minimum age limit information on marketing content (i.e. the 18 plus sign);
3. Omit reference to a Swedish gambling addiction organization and its contact details;
4. Send marketing to any of SuprPlay's customers with closed accounts or any other third party individuals who are not SuprPlay customers without our having their express approval/consent to send these out;

5. Ensure players have not opted out from receiving marketing communication or certain types of marketing communication specifically, and ensure there are opt-outs with every text/sms or email send out. In case of third parties (not currently players of ours), no marketing is to be sent without specific and informed consent of that individual, and opt-out links must also be available per send out assuming consent has already been given and collected and stored accordingly, also noting any types of marketing the individual may have already opted out from.
 6. Bombard players with marketing texts/emails but these should also be in moderation. See above for further guidance on moderate marketing;
 7. Send out any offers or bonuses (besides the initial welcome bonus on one brand (NYSpins) as permitted by Swedish legislation. Hence it is prohibited to send out **any loyalty schemes, cashback deals, paybacks, lowered fees, free games, or other reward or goodwill programs or any form of bonus or other gifts whatsoever to Swedish players.**
 8. **It is also prohibited to imply that players may be getting a benefit out of any spells or “magic” as part of their customer journey on the site. There should be nothing within marketing content to imply that SuprPlay is giving any kind of reward or advantage by participating on any SuprPlay Websites, whether in relation to “treasure chests”, “welcome chests”, “spells” or “magic” or similar. Such wording is not permitted, nor are any other terms or similar phrases that would mislead our customers into thinking they will get a benefit of some sort.**
- In terms of the allowed initial bonus offer (limited to one bonus per licence), please note that full and complete terms and conditions of the bonus offer should be presented to the consumer **a maximum of one click away from the advertisement.** Terms and

conditions must be clear and easily accessible. Ensure that the text is clearly visible and that the coloration blend or size of text does not render the terms unreadable. We must allow **60 days** for player to fulfil bonus conditions.

9. Display any marketing content using tiny font or in a colour that does not stand out against the background, thus making it difficult for the reader to properly read the text;
10. Use forms of marketing so as to attract special attention, this for instance in the form of pop-up or take-over advertisements on newspaper' websites or other websites where customers are not able to use the specific site without having to be in immediate contact with marketing (including but not limited to instances where marketing ads are placed in the background covering the whole screen). Users should also not need to click to close a marketing ad prior to being able to read the information on the site they have chosen to visit;
11. Use marketing as part of the registration process whatsoever;
12. Use SuprPlay's Swedish licence symbol, number or information in any way that would draw special attention to the fact that SuprPlay is in possession of a Swedish licence by using words or graphics that make it seem like an award or something unique or special that SuprPlay possesses;
13. Use any references or IP rights pertaining to Bank ID shall be used in any marketing content whatsoever. This includes the Bank ID wordmark or logo.
14. Use of any of the following claims within marketing campaigns or other content:
 - claims that registration or opening of an account is not required to play;
 - claims of fast pay-outs;
 - directing marketing to people under 18 years old;
 - urgency claims such as "Play Now" and "Play Immediately";

- claims that gambling can be an alternative to work;
- claims that give an impression that the chance of winning is greater than it is;
- claims that attract people to play too much money;
- claims that it is risk-free to play. For instance claims that customers can “play safe” or “play securely” as this may be misleading to players who may assume their gambling is risk-free. Use of these may be permissible should this be qualified in terms of electronic verification. However note that “Bank ID” specifically in words or using any IP rights such as logo or trademark is also not permissible. Hence alternatives such as “Mobile ID/Mobilt ID” may be used instead. Therefore note it is permissible to use “Play securely with Mobile ID” or similar.
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However please note that Affiliate partners must **adhere to our affiliate T&Cs at all times**, whether pertaining to marketing or otherwise.

D) Note also the **BOS & SPER Guidelines** annexed hereto which are also applicable in Sweden.

Conclusion:

As a general rule, when in doubt if any ad/marketing material is compliant with Swedish gambling or marketing laws and/or guidance, please refer to the SuprPlay Legal & Compliance Dept. for further checks and advice prior to sending out to any customer or other third parties.

