

trafficology

AFFILIATE FOCUS BY GAMBLING INSIDER

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AFFILIATE REWARDS

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TRAFFIC REPORT

Trafficology has partnered with data experts Casino City Press to provide insight into website and traffic trends across the gaming industry. Here is a breakdown of the top 20 affiliate programs overall and by continent for H1 2019, in comparison with H2 2018.

OVERALL

Rank	+/-	Name	Website
1	1 ▲	FreeSlots.com	freeslots.com
2	4 ▲	AskGamblers.com	askgamblers.com
3	-	NonStopBonus.com	nonstopbonus.com
4	3 ▼	Online Casino Reports	onlinecasinoreports.com
5	-	Penny-Slot-Machines	penny-slot-machines.com
6	2 ▼	VegasSlotsOnline.com	VegasSlotsOnline.com
7	5 ▲	Las Vegas Advisor	lasvegasadvisor.com
8	7 ▲	Gambling Sites.com	gamblingsites.com
9	-	Casino.org	casino.org
10	1 ▲	Online Casino Ground	onlinecasinoground.nl
11	3 ▼	New Free Spins No Deposit	newfreespinsnodeposit.com
12	9 ▲	No Deposit Kings	nodepositkings.com
13	6 ▼	The Big Free Chip List	thebigfreechiplist.com
14	1 ▼	Wizard of Odds	wizardofodds.com
15	3 ▲	Gambling.com	gambling.com
16	7 ▲	Gamble Joe	gamblejoe.com
17	3 ▲	Casino.Guru	casino.guru
18	4 ▲	King Casino Bonus	kingcasinobonus.co.uk
19	13 ▲	Casino City	casinocity.com
20	4 ▲	Casino Freak	casinofreak.com

AFRICA

Rank	+/-	Name	Website
1	2 ▲	PlayCasino.co.za	playcasino.co.za
2	1 ▼	VegasSlotsOnline.com	vegasslotsonline.com
3	54 ▲	Snazzy Slots	snazzyslots.com
4	-	FreeSlots.com	freeslots.com
5	-	Penny-Slot-Machines	penny-slot-machines.com
6	61 ▲	My Betting Deals	mybettingdeals.com
7	4 ▲	AskGamblers.com	askgamblers.com
8	2 ▼	The Big Free Chip List	thebigfreechiplist.com
9	32 ▲	Casinomeister	casinomeister.com
10	6 ▲	Casino.org	casino.org
11	6 ▲	Slots-777	slots-777.com
12	-	Gambling Sites.com	gamblingsites.com
13	6 ▼	SlotCatalog	slotcatalog.com
14	6 ▲	Gambling.com	gambling.com
15	31 ▲	CasinoHex No. 1 Guide to Gambling in South Africa	casinohex.co.za
16	2 ▲	GratisGokken.nl	gratisgokken.nl
17	2 ▲	CasinoelArab	casinoelArab.com
18	9 ▼	NonStopBonus.com	nonstopbonus.com
19	15 ▲	RouletteForum.cc	rouletteforum.cc
20	9 ▲	ZALOZIBG	zalozigb.com



Rankings are estimated using statistical data and should not be considered absolute ranking values. More than 50 complementary top lists are available on the iGamingDirectory.com website operated by Casino City Press



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ASIA

Rank	+/-	Name	Website
1	8 ▲	Penny-Slot-Machines	penny-slot-machines.com
2	-	VegasSlotsOnline.com	vegasslotsonline.com
3	5 ▲	Bitcoin Casino No Deposit Bonus	bitcoin-casino-no-deposit-bonus.com
4	-	Online Casino Reports	onlinecasinoreports.com
5	-	AskGamblers.com	askgamblers.com
6	-	SlotCatalog	slotcatalog.com
7	13 ▲	casino-love.com	casino-love.com
8	7 ▼	Casino+Bonus	casinoplusbonus.com
9	1 ▲	Casino.org	casino.org
10	2 ▲	Japanese Casino.com	japanesecasino.com
11	2 ▲	Wizard of Odds	wizardofodds.com
12	9 ▼	CasinoOnline.jp	casinonline.jp
13	11 ▲	Online Casino Hikaku Navi	vegasdocs.com
14	3 ▲	World Casino Directory	worldcasinodirectory.com
15	-	Gambling Sites.com	gamblingsites.com
16	20 ▲	FreeSlots.com	freeslots.com
17	10 ▼	Kazino Igri	kazinoigri.com
18	1 ▲	SlotsUp	slotsup.com
19	5 ▼	GratisGokken.nl	gratisgokken.nl
20	24 ▲	CasinoGamesOnNet.com	casinogamesonnet.com



EUROPE

Rank	+/-	Name	Website
1	-	AskGamblers.com	askgamblers.com
2	-	VegasSlotsOnline.com	vegasslotsonline.com
3	-	Gamble Joe	gamblejoe.com
4	5 ▲	FreeSlots.com	freeslots.com
5	1 ▼	Penny-Slot-Machines	penny-slot-machines.com
6	9 ▲	CasinoGrounds	casinogrounds.com
7	2 ▼	Latest Casino Bonuses	lcb.org
8	9 ▲	Casino.Guru	casino.guru
9	4 ▲	Casinomeister	casinomeister.com
10	28 ▲	Casinofoorumi	casinofoorumi.com
11	16 ▲	Online Casino Ground	onlinecasinoground.nl
12	6 ▲	SlotCatalog	slotcatalog.com
13	6 ▼	LatestCasinoBonuses	latestcasinobonuses.ru
14	3 ▼	About Slots	aboutslots.com
15	4 ▲	The Big Free Chip List	thebigfreechiplist.com
16	4 ▼	Play Book Of Ra	play-book-of-ra.net
17	7 ▼	CasinoGamesOnNet.com	casinogamesonnet.com
18	10 ▼	Paroli's Roulette Forum	roulette-forum.de
19	5 ▲	Online Casino Reports - Romania	onlinecasinoreports.ro
20	11 ▲	Casino+Bonus	casinoplusbonus.com

LATIN AMERICA

Rank	+/-	Name	Website
1	-	Penny-Slot-Machines	penny-slot-machines.com
2	-	Casino.Guru	casino.guru
3	2	Juegos Casino	juegos-casino.org
4	5 ▲	FreeSlots.com	freeslots.com
5	1 ▼	Casino En Linea HEX	casinonlineahex.com
6	3 ▲	Tragamonedas.com	tragamonedasx.com
7	4 ▼	SlotJava	slotjava.es
8	- ▲	GanaTuSueldo	ganatusueldo.com
9	38 ▲	Wizard of Odds	wizardofodds.com
10	3 ▲	VegasSlotsOnline.com	vegasslotsonline.com

Rank	+/-	Name	Website
11	8 ▲	Fanaticojuegos.com.ar	fanaticojuegos.com.ar
12	16 ▲	Casino Top 10.com.br	casinotop10.com.br
13	10 ▼	Casino.eu	casino.eu
14	2 ▲	Slotozilla	slotozilla.com
15	9 ▲	OnlineRoulette.org	onlineroulette.org
16	2 ▲	Casinomeister	casinomeister.com
17	395 ▲	Easy Money Blackjack	easymoneyblackjack.com
18	2 ▼	Casino.org	casino.org
19	6 ▲	Casino Games 77	casinogames77.com
20	4	GratisGokken.nl	gratisgokken.nl

NORTH AMERICA

Rank	+/-	Name	Website	Owner	Game Type	Primary Language
1	-	FreeSlots.com	freeslots.com	SimSlots	Casino	English
2	-	VegasSlotsOnline.com	vegasslotsonline.com	-	Casino	English
3	-	Penny-Slot-Machines	penny-slot-machines.com	-	Casino	English
4	-	Wizard of Odds	wizardofodds.com	Ample Chance Group	Casino	English
5	-	Las Vegas Advisor	lasvegasadvisor.com	Huntington Press	Casino	English
6	-	Free Slots No Download	free-slots-no-download.com	-	Casino	English
7	4 ▲	Gambling Sites.com	gamblingsites.com	-	Casino	English
8	1 ▼	Casino.org	casino.org	CG Holdings	Casino	English
9	-	SlotsUp	slotsup.com	-	Casino	English
10	10 ▲	AskGamblers.com	askgamblers.com	Catena Media	Casino	English
11	14 ▲	Casino.Guru	casino.guru	-	Casino	English
12	2 ▼	The Big Free Chip List	thebigfreechiplist.com	-	Casino	English
13	13 ▲	CodeShare	codeshareonline.com	-	Casino	English
14	1 ▼	The Wizard of Vegas	wizardofvegas.com	Ample Chance Group	Casino	English
15	1 ▲	Onlinegambling.com	onlinegambling.com	-	Casino	English
16	2 ▼	World Casino Directory	worldcasinodirectory.com	Ample Chance Group	Casino	English
17	-	NonStopBonus.com	nonstopbonus.com	-	Casino	English
18	6 ▼	American Casino Guide	americancasinoguide.com	Casino Vacations Press	Casino	English
19	1 ▼	Starchip Enterprises	starchip.com	-	Casino	English
20	2 ▲	Slots-777	slots-777.com	-	Casino	English

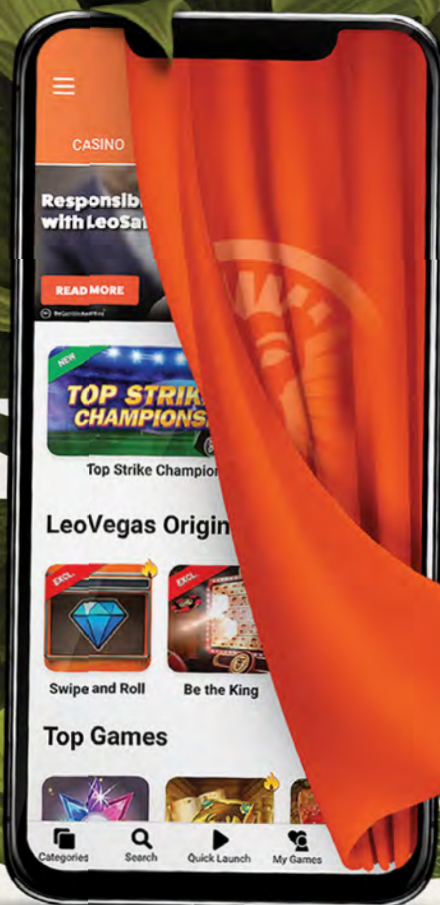


OCEANIA

Rank	+/-	Name	Website	Owner	Game Type	Primary Language
1	-	Online Pokies 4 U	onlinepokies4u.com	-	Casino	English
2	-	The Big Free Chip List	thebigfreechiplist.com	-	Casino	English
3	-	VegasSlotsOnline.com	vegasslotsonline.com	-	Casino	English
4	-	NonStopBonus.com	nonstopbonus.com	-	Casino	English
5	9 ▲	Quickie Boost	quickieboost.com	-	Casino	English
6	1 ▲	AskGamblers.com	askgamblers.com	Catena Media	Casino	English
7	4 ▲	Penny-Slot-Machines	penny-slot-machines.com	-	Casino	English
8	2 ▲	New Free Spins No Deposi	newfreespinsnodeposit.com	-	Casino	English
9	4 ▼	No Deposit Kings	nodepositkings.com	-	Casino	English
10	1 ▼	Online Slots NZ	online-slots.co.nz	-	Casino	English
11	5 ▼	Wizard of Odds	wizardofodds.com	Ample Chance Group	Casino	English
12	20 ▲	FreeSlots.com	freeslots.com	SimSlots	Casino	English
13	5 ▼	MamaBonus	mamabonus.com	-	Casino	English
14	3 ▲	Casino.org	casino.org	CG Holdings	Casino	English
15	3 ▼	SlotsUp	slotsup.com	-	Casino	English
16	3 ▼	Latest Casino Bonuses	lcb.org	Ample Chance Group	Casino	English
17	1 ▼	Gambling.com	gambling.com	Gambling.com Group	Casino	English
18	6 ▲	Casino Freak	casinofreak.com	-	Casino	English
19	8 ▲	AustralianCasinoClub	australiancasinoclub.com	-	Casino	English
20	8 ▲	Free pokies online	free-pokies.net	-	Casino	English



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HOW SHOULD OPERATORS REWARD AFFILIATES?

With the help of industry analysts, **Tim Poole** explores whether operators can reward affiliates for non-traffic-related achievements

As far as operators are concerned, affiliates are there to do what they say on the tin. They generate leads and, whether through revenue share or CPAs, are rewarded for the traffic they create. Simple, right?

In practice however, like any product, company or industry, there are grey areas which fall out of this very concrete way of measuring performance. Some affiliates, for instance, will generate deposits indirectly; others will show long-term loyalty towards certain partners during testing times; then there are those that will sacrifice traffic for greater compliance. Should these kinds of good practice really go unrewarded?

For a clearer example of the issues at hand, one can look at sites like Bettingexpert, Oddschecker or Free Super Tips. If a player wants to place a bet on a football match with a sportsbook like Ladbrokes, but are not sure what selection to go for, they might refer to a tip on Bettingexpert, an odds comparison on Oddschecker or a preview on Free Super Tips. After consuming the information and content they need, they click away from the affiliate's website and place their wager. In

that situation, there is no proof the affiliate generated that deposit or bet, despite the site acting as a crucial facilitator in the middle of the process.

Oren Arzony, Marketing Manager at House Tech Ads, says this is a well-known issue affiliates are unsure how to tackle. He tells *Trafficology*: "On the one hand, we cannot force the user to click via an affiliate link, so it'll be tracked. On the other hand, there's a consensus affiliates should be rewarded for the users they drive to the operator."

Affiliates also face little in the way of reward for thinking outside the box. As their primary job is to be the middle man and lead a player to a third-party casino or sports betting site, this is hardly a surprise. Sometimes though, a little variation doesn't go amiss. Casino affiliate site MrCasinova.com is attempting something very much along these lines, donating £1 (\$1.28) to charity for every player it sends to an online casino.

But when *Trafficology* asks the CEO of parent company Inovatiq, Sirp de Wit, whether these kinds of initiatives are acknowledged by operators, or whether it's just down to traffic generation, he replies: "For sure, I haven't really seen operators jump too much on it. It's mainly down to the value and amount of new players and they don't really care about the source of where it comes from."

If traffic is king, this tees up another conundrum. As Arzony explains: "In cases of compliance where we need to make concessions that include removal of content, we can see an impact in the form of traffic loss." The situation this creates is one of good practice only leading to a loss for the affiliate. "At the same time, other non-compliant affiliates who ignore the guidelines set by operators continue to thrive," Arzony continues. "The operators take no action to make sure the guidelines are followed. We think there should be some kind of solution for this matter."

Before we all collectively sympathise with the affiliates, are there any fixes we can present in these grey areas? Candidates in the current series of the UK version of The Apprentice have been fired for highlighting the negatives without offering potential solutions, while school essays merely describing problems without evaluating them would never be awarded more than a C grade. It's obvious why any operator would minimise its costs as much as possible; but might it be worth them exploring methods of rewarding affiliates outside simply measuring traffic and revenue?



OREN ARZONY



TAL ZAMSTEIN

Tal Zamstein, Consultant at Hybrid Interactive, believes the answer is a firm yes. He tells *Trafficology*: "Affiliates should be rewarded for consistency and loyalty. The length of co-operation is important and a senior partner should be recognised. There should be a factor per territory, as the competition is totally different within different territories. An affiliate that serves more than one territory with a big company should be recognised and get a discount for quantity."

De Wit agrees this should be on the agenda for operators. He believes campaigns like MrCasinova.com's would add value to a gaming firm's reputation. "If bigger campaigns are set up in this way, and if I was an operator, I would be very interested in getting this traffic in," the Inovatiq CEO says. "I would obviously reward the affiliate for this. I'm not entirely sure in what way, but I would reward them in a different way."

**"AFFILIATES SHOULD BE
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– TAL ZAMSTEIN**

It is exactly how an operator would go about offering these rewards that remains the million-dollar question. Both revenue shares and CPAs are tried-and-tested methods. To create a new system would require a little imagination; needless to say, it would also need to benefit all parties. Why, after all, would a gaming company go out of its way to reward a partner, if it ended up increasing costs without gaining anything extra in exchange?

Arzony suggests: "The solution should be somewhere in the middle, taking into consideration the type of relationship the affiliate and operator have and the volume of traffic the affiliate generates. Possible solutions that come to mind include rewarding affiliates per impression or sign-up; for example, in a tier-based model on top of the commission generated by the actual sales. The other option is an exposure-based model with a fixed amount on top of commission. This depends on the magnitude of the campaign, including the volumes and quality of the traffic in question."

For Zamstein, there is a comparison between how operators would treat players and how they should treat affiliates. He says: "Exactly like operators treat customers, reward loyalty, giving a premium for visibility. Tournaments with different rewards can add incentives. A personal interaction is a key in any relationship as well."

The biggest issue here however is whether this dynamic will ever really change. Clearly, there are overlooked facets of the operator-affiliate relationship and it is all well and good *Trafficology* theorising about a panacea for affiliates; but these facets are overlooked for a reason. If operators can extract their main value from affiliates (lead generation) without having to work through other types of commercial agreements, they won't need to initiate change any time soon. For affiliates, it might be a case of campaigning to have these issues noticed.

"The main reward will always be a commercial one; that is the main purpose for work," Zamstein concedes. "But there should be an additional tool of reward, as mentioned, like a loyalty system and competitions, with clear rewards, targets and goals to the benefit of both sides."

The vital point here is it will indeed benefit both sides. If there's an upside to be had for operators too, sometimes all it takes is a little nudge from affiliates to let them know. Gaming operators, at the end of the day, function like any other business. Profit, revenue and success are central goals. If an affiliate can better feed that success through indirect traffic, improve an operator's image through charitable campaigns or bolster their reliability through compliance, an operator will always listen if there are genuine advantages on the table.

If operators don't need to provide extra incentives for affiliates – and aren't pushed to – no one can blame them for not doing so. It must be acknowledged we don't live in a fantasy world: not all good things are rewarded. But, as highlighted, there are potential benefits here for both operators and affiliates, when it comes to these grey areas being taken into account and incorporated into contracts and business plans.

Perhaps finding a solution is something the affiliate sector should sit down and address with operators. What better opportunity to influence real change than at SiGMA and the London Affiliate Conference in the coming months?



AFFILIATE MARKET FOCUS: CEE

Hybrid Interaction consultant **Tal Zamstein** provides a guide for affiliates on the state of play in different markets within the Central European territory

Central and Eastern Europe (CEE) is going through a period in which the market is shaping itself from scratch, with new regulated operations in each country. In the last five years, nations like Poland, Czech Republic, Romania, Croatia and others have made big steps towards creating a mature regulated gaming market. These processes also have a big impact on channels of consumption, as the markets shift to online and a full, multi-product experience. The old way to operate separately offshore online (from Malta, Gibraltar, Curaçao etc.) is disappearing and the retail market, which used to be reserved only for conservative operators, changed its face to a new approach that combines a multi-channel experience.

CZECH REPUBLIC

Czech Republic published a new gambling law at the beginning of 2017. The market used to be dominated by offshore operators (Bet365, Unibet, PokerStars, GVC Holdings) in regards to online casino, sports betting and poker. Lottery was offered by Sazka and Fortuna (two local suppliers). Retail sports betting was divided between two local companies: Tipsport and Fortuna. The retail gaming offer was addressed by lots of small operators, which

owned gaming halls and several casinos mainly outside the cities.

In 2017, the local regulator decided to implement full identity verification for online and retail customers simultaneously. In addition, the market opened itself to a fully-regulated gaming offering. The problem however, was facilitating the customer verification requirement of "face-to-face registration." Offshore operators could not fulfill the task of verifying the customer identity in shop.

This meant once regulation took force, the local operators could accelerate with online efforts, while global players were pushed out of the market. The market itself had a lot of restrictions (such as maximum payout per spin), which forced suppliers to amend the product.

The bottom line shows, despite the fact the first license in the market was given to PokerStars (for a very limited product which is not a success story after more than two years), there are no foreign operators which managed to enter the regulated market successfully. Currently, Czech customers are exposed to a fully diverse product offering, through several local operators (TipSport, Sazka, Fortuna, Synot) which control the sports betting, casino and lottery markets.

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The retail business lost its main advantage of playing anonymously, so several gaming hall operators closed shops as customers moved online. There is an equal shift of online revenue within Czech slots manufacturers (Kajot, Egaming, Synot, Apollo and a few others).

POLAND

The Polish market has actually been under local regulation for a long time, although it was not forced and the taxation was very unique. There were no casino licenses and sports betting was taxed at 12% of turnover, ensuring high margins to stay profitable. This situation led to a reality where operators were not really able to compete with offshore operators that could trade with lower margins.

The biggest change in the market came after the Polish regulator managed to co-operate with the biggest payment suppliers in the market and block offshore operators from money supply. The result was an exodus of big operators (Bet365, William Hill, Betfair etc.) from the market.

The sports betting taxation has not been changed, although everyone today is exposed to the same rules and the odds are more fair, unlike the casino offer that is reserved for the government-owned monopoly. In addition, there was a clear act to "clean" the streets from gaming halls and only the government is allowed to operate slots and casinos in partnership with a few suppliers.

The open market is then restricted to sports betting and fixed-odds products (such as virtual sports). Several operators have received new licenses (such as Cherry, LVBet, Betclit and others) and Gauselmann Group from Germany acquired a large operator - Totolotek.

CROATIA

In Croatia, the big income still lies in the retail business. Customers can step inside shops and bet/play anonymously. Prominent operators include SuperSport, PSK and StanleyBet, while Admiral is allowed up to two slot machines per shop. Since January 2017, the government has allowed each operator which owns a retail casino to additionally offer games online with an annual fee payment. Online sports betting is allowed for each operator with a minimum of 30 shops in the country, which has fulfilled regulatory requirements.

The market was very exposed to offshore operators though, with more comprehensive gaming offers (many more games suppliers etc.) and, since mid-2019, there has been an active IP blocking action in place from the regulator. Due to this, there has been double-digit growth for licensed operators.

Recently, some new operators entered the market (CasinoArena, Admiral) and took advantage of this. The market is still very retail-dominated but the online opportunity is very promising and, considering the shift from offshore to regulated brands, there is significant value for operators despite high costs of entry.

SLOVAKIA

Slovakia is the last country to pass a new gambling law in this area. The government published it in the middle of 2019, in which the law is looking at all operations as digital, addressing all gaming verticals. Until now, casino and lottery were under a monopoly and supplied

to the market only through the government-owned brand Etipos.

The small market is maybe less inviting due to its size, yet there are fewer boundaries for global operators. There is also a clear decision that at least two licenses will be issued to each product from the beginning, to avoid an advantage for a single operator.

The largest challenge in the market currently is the fact only the small public lab is accredited to certify content, which makes the process long and inefficient. Lottery will remain a monopoly and only Etipos will offer this product.

ROMANIA

Romania is the most mature market in the region. Gambling was addressed in the country already back in 2009. The market is the most competitive in the CEE, including the likes of Unibet, Betano, Sportingbet and 888. There is still a big presence of retail operators, with Superbet the biggest player in the market and Fortuna Entertainment Group following with two brands (Fortuna and Casa Pariurilor). Novomatic, Mozzart and StanleyBet also play a role in the shop business. The biggest retail operator is MaxBet, with big venues which contain as many as 50 slot machines. The notable casinos operate mainly from hotels and are well-visited.

Customers face plenty of choice when they step into a betting shop. There are up to five slots, virtual sports, a comprehensive and competitive betting offer, dogs, horses and instant lottery. The only restricted products for the national lotteries are the weekly interval lotto draws and scratchcards.

Retail still offers a high volume in Romania, as there is no requirement to verify customers. Customers are stepping into shops with cash, playing and collecting winnings with no identity revealed. The fact customers can find sports betting and casino under one ceiling helps operators to be attractive.

SUMMARY

Overall, the CEE has started to go through a very important phase, in which gaming has become a local subject. Through local regulation, gaming is becoming more casual and accessible to everyone. However, we can see the local regulators prefer to work with the local big-name operators in most of the territories. I assume some global operators will pick up the opportunity and acquire local businesses to add the region to their portfolio. This might be the easiest way to penetrate the region and incrementally add revenue while consolidating costs. There are lots of local manufacturers within the region (EGT, Synot, Novomatic, NSoft, GameArt and more).

The most important thing for affiliates to know though, is there has been a cultural shift towards gaming, moving it out of the shadows and into a period when it is considered common entertainment.

Mr. Tal Zamstein has over a decade of online gaming experience with large online brands, as well as known retailers such as GVC Holdings, YouWin, Merkur and recently, as the Head of Gaming with Fortuna Entertainment Group. Currently, Tal has teamed up with Hybrid Interaction, an online gaming consultancy agency, covering the sports, product and regulatory compliance areas.



HELPING OPERATORS IMPROVE COMPLIANCE

Joonas Karhu, Chief Business Officer at Bojoko, suggests ways affiliates can help operators improve compliance and responsible gambling

The Gambling Commission has made it very clear online gambling operators are ultimately responsible for the ways in which affiliate partners promote brands on their behalf. Affiliates still remain a significant driver of new player traffic for online casino brands both new and established. As such, most operators are keen to keep these relationships in place.

But in this new era of compliance, this has led to some significant changes to the affiliate ecosystem and the ways in which publishers can promote online gambling brands. From the visibility of Ts & Cs to using the correct terminology and ensuring players are aware of responsible gambling tools and services, operators and affiliates have had to up their game. This is absolutely a good thing and any professional online gambling affiliate should want to meet the highest possible standards, regardless of new compliance requirements.

At the moment however, it seems operators are shouldering all the responsibility when it comes to educating affiliates about these new requirements and ensuring they play by the rules. While the buck should ultimately stop with them, affiliates can and should work more closely with operators when it comes to responsible gambling and compliance. Below, I outline the ways online gambling affiliates can help operators when it comes to compliance and providing

players with the tools and information they need to stay in control of their play.

GIVE PLAYERS THE INFORMATION THEY NEED

Online gambling affiliates are highly-skilled content creators and publishers and this is one of the most impactful ways they can help with compliance and responsible gambling. From a compliance point of view, affiliates must ensure their content is informative, accurate, balanced and transparent.

The information published should help players make an informed decision about not only where to play, but whether they should play in the first place. This means creating guides and articles about what to expect from online casinos, the various bonuses and promotions they will be offered and the terms and conditions they come with. This is certainly the case when it comes to wagering requirements as this is an area that often confuses players and can lead to them wagering beyond their means.

This information should be displayed in any offer Ts & Cs; but professional affiliates meeting the highest possible standards will provide detailed guides and explanations in addition to this. It is also crucial affiliates be mindful of the different jargon they are required to use by different operators – some like the term bonus spins over free spins,



AUTOMATE COMPLIANCE

Compliance is a huge undertaking for both operators and affiliates; but there are ways to streamline the process while ensuring the information published is accurate and up to date. This definitely applies when it comes to Ts & Cs: at present, operators email affiliates with updates to offers and Ts & Cs. But with some affiliates listing more than 100 brands, it's not practical to keep on top of such a large volume of emails and updates. To get around this, affiliates should consider ways of automating the process.

MEET WITH OPERATORS AND WORK TOGETHER

One of the tremendous upsides of running an affiliate business is it can be done from anywhere in the world; you just need a laptop and an internet connection. While this is an upside that undoubtedly draws people into the sector, it is a downside in that operators and affiliates rarely meet, if at all. Most meetings take place at conferences such as LAC (London Affiliate Conference) and even then, discussions are usually around traffic and deals, not compliance and responsible gambling.

It is important for operators and affiliates to meet regularly and keep an open line of communication available at all times. We also believe discussions should not just be about traffic and deals, but also how both parties can work more closely together to ensure compliance and to better protect players. This is a joint effort and while the operator is ultimately responsible, for the affiliate ecosystem to survive this new era of highly-regulated online gambling, both parties must play their part.

Of course, for professional affiliates seeking to establish successful and sustainable businesses, this will be an absolute priority. For those that are not, it won't be. What this will ultimately mean is the affiliates who are compliant and work hard to protect players will survive and thrive, while those who don't will not. This can only be a good thing for operators, affiliates and most importantly players, as only the reputable and responsible affiliates will remain.

for example. This requires working closely with operators and having the foresight to check what terms they prefer to use before writing content.

Alternatively, affiliates could give more control over content creation to operators. This is what we have done, allowing our operator partners to create their own profiles where players rate and review the experience they have at their casino.

OFFER RESPONSIBLE GAMING TOOLS

Operators are required by the Gambling Commission to provide players with the ability to set limits – deposit, loss, wager, time etc. – to help them remain in control of their play. Affiliates can and do write about these tools and explain to their readers what they are and how they work. But they should look to take this a step further and provide their own.

Offering such tools may seem counter-intuitive, as online gambling affiliates want their readers to sign up to and play on new sites regularly. But to properly protect players, especially those at risk of developing gambling addictions, it is absolutely necessary to make these products available to them.

Equally, it helps online gambling operators to ensure players who have taken a cooling-off period or who have self-excluded cannot "slip through the net" as sometimes happens. So yes, it is ultimately down to the operator to ensure self-excluded players cannot sign up to their sites and that they assist those with gambling problems, but affiliates can certainly help.

"IT HELPS ONLINE GAMBLING OPERATORS TO ENSURE PLAYERS WHO HAVE TAKEN A COOLING-OFF PERIOD OR WHO HAVE SELF-EXCLUDED CANNOT 'SLIP THROUGH THE NET' AS SOMETIMES HAPPENS"



FOCUSING ON CORE MARKETS

Katy Stafford, Head of Affiliates at ComeOn, discusses her background in gaming, the operator's move away from the UK market, new market opportunities and increased affiliate regulation

Can you tell me a bit about your background in gaming?

I got into gaming in 2005. I started off with AdsDotCom, which was the marketing wing of InterCasino. That was one of the first online casino operators and it was owned and operated by CryptoLogic. CryptoLogic was eventually bought out by Amaya. I started out doing office management, including some HR and finance in the London office. I was there from 2005 to 2010, when we moved to Malta. It was at that point I moved into the affiliation side with InterCasino to be Head of Affiliates for InterPartners, which is the affiliate program.

After nine-and-a-half years with the business and after four years in Malta, I decided to move on and become Head of Affiliates at Cherry. Two years ago, we merged with ComeOn and last year we merged Cherry Affiliates with Earn Affiliates, which is the old ComeOn affiliate program, and relaunched as ComeOn Connect.

How different was your role with InterPartners compared to anything you had done before?

I went into affiliation because when we moved to Malta, I couldn't really do finance or HR, because I didn't speak Maltese. But I was quite lucky, because when we were in London, there were a lot of social events and the company used to go to ICE every year back when it was still at Earl's Court. I knew a lot of old school big affiliates back in the day, so I thought going into affiliation would be an interesting move, because that side of the business always interested me.

The focus for InterCasino back then was very much on Europe, in particular the UK and Japan, and we still had the US open as well. It was before there was a lot more regulation in Europe. We were in Germany, France, Italy and Spain.

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Are you saying it was much more common to do revenue share deals previously in the UK?

Yes. When I first started, we didn't really do CPAs or hybrids. It was all revenue share, because the good affiliates knew the partnership was the most important thing. You knew those people and there may have been paid placements for top positions on comparison sites, but everything else was revenue share. Nowadays, it's far more competitive. The affiliates were good, but many of the partners we were working for wanted a hybrid or a CPA. The big PPC affiliates work only on very high CPAs.

What was behind this change?

I think it was when the Gambling Commission started clamping down harder on the compliance side. The players had been fresh for the taking, in a way. Now, everyone is a bit more cautious; the players as well as the operators. It's more about building very good relationships with a small amount of affiliates rather than casting the net wide.

We use Rightlander to scan the UK and any regulated market, and it's amazing how much stuff comes back. I've got a team of 10, and we don't have the time to make sure every single affiliate site we work with is being fully compliant, but Rightlander has flagged quite a lot of things you wouldn't otherwise realise.

Do you see increased affiliate regulation as more of a challenge or an opportunity?

I think it's a bit of both. Regulation is a brilliant thing, but the regulators have to understand what they're doing. I think imposing ridiculous rules will hurt the player and the operator more, and will ultimately hurt the regulator more. I think there should be very clear guidelines about what's allowed and what's not. If they are too harsh, the players will just go somewhere else; to operators that aren't regulated. That then leads to a rise in black-market operators that really don't care. If you care about the player, you will want them to enjoy what they are doing and not get into any issues with problem gambling. We want players that are able to play and we wouldn't have a business if we weren't acting in the best interest of the players anyway.

There has been a lot of discussion recently about whether affiliates should take more responsibility when mistakes are made. Where do you stand on this?

As an affiliate manager, it's your responsibility to monitor your affiliate. You need to do your due diligence from the get go. However, it should be a partnership. Both sides are making money, so if an affiliate tries to claim something is not their problem, I think that's really short-sighted. Those are the affiliates I would never want to work with, and they would lose their business very quickly.

I don't think affiliation is just acquisition now. I think it's a very good branding retention tool. It should be a 50/50 split.

What are ComeOn's overall plans for the affiliate division in the next few years?

We need to make sure we're as transparent and trustworthy as possible. We need to work with the affiliates and create long-standing, mutually-beneficial partnerships.

We share a lot of data within our system, but if an affiliate wants to know a bit more about the traffic they send, we want to share information so they can build their sites better and target their audience better.

ComeOn is of course far more Nordic-focused. Sweden is by far our biggest market, followed by Finland and Norway. We had a UK license, but recently relinquished it. Our core markets are still the Nordics and Germany. We were recently granted a license for Denmark and we just launched our new Japanese brand last week.

When you say the core markets are the Nordics and Germany, are there any other new markets you see as particularly lucrative for the affiliate space?

We're always looking at new markets. The re-regulation of the Swedish market has made it a turbulent year, and we left the UK.

We've been delisted and Cherry was sold to EE Intressenter, so 2019 has been about focusing on what we do best. In 2020, there will be more of a focus on new markets. LatAm is of course very interesting, but we've been saying that for years. I think Africa will be very interesting as well and that has been a focus of affiliate panels at shows recently.

In Europe, people are still unsure about sports betting regulation in Germany. Norway could potentially regulate and the Netherlands is in the process of doing so. It never really stops with gaming and there's always something around the corner.

In terms of the UK market and in terms of player acquisition, what was it that made the UK so difficult?

UK players are pretty savvy and it's quite a saturated market. Because everyone wants a piece of the pie, the cost of running an affiliate program meant you couldn't just do revenue share. You had to look at CPAs or hybrids. From our perspective, it was about being able to do that and making sure the affiliates themselves were compliant, in terms of how their sites looked and what they were telling players. It was getting more and more tough.

It was a strategic business decision. We wanted to focus on the markets we know we can grow and foster, and we've seen in the last few years that a lot of people have been moving out of the UK. I think there will only be four or five big players left there by the end of 2020, which I think is a massive shame.

STS CEO: POLAND WILL NOT FACE BLANKET BAN ON ADVERTISING

Mateusz Juroszek, CEO of operator STS, spoke with *Trafficology* about the Polish market and the difficulties with marketing

What was your background before you became STS CEO?

I've been in this business all my life. STS was founded about 20 years ago. I basically grew up in the company and I joined STS when I was still in university. Before that, I did some summer internships and consulted at a different company in Warsaw, but in my third year, I started with STS. I've been running STS here in Poland for over 10 years.

I was once told you never leave gaming once you get into the industry, and it's true. As a kid, I used to compete in a lot of sport and I still do; my whole family is into sport. We love watching all kinds of sports. I used to play semi-professional football, and I also did snowboarding. My father was a ski jumper and also played professional table tennis. Everyone in my family has a connection with sports and it's great to be able to link that passion with day-to-day work.

What is the current state of legislation regarding advertising in Poland?

Advertising in Poland is very complicated. Regarding the casino, there is only one regulated casino - the state-run operator [Totalizator Sportowy]. It is not allowed to advertise. When it comes to sports betting, legislation was not written by experts, so they put in all kinds of different paragraphs to make the advertising much more difficult

for us. We have to be very careful. We can only advertise on TV after 10pm. We can inform about sponsorship deals during the day, but there are many exceptions and it is still very tricky.

It's complicated and there isn't a manual for the industry, but we don't see a blanket ban coming in like the one in Italy.

Mainstream media and the public often paint gaming in a negative light in the UK. What is the public perception of gambling in Poland?

This industry is much younger than the one in Italy or the UK. For the last 20 to 25 years, this industry was actually being created. We had a few companies that only offered land-based betting and then there was a big problem because Poland was not fully regulated. We had so many offshore companies from Malta and Gibraltar that were offering online sports betting and casino.

They did not have licenses to operate in Poland and were not paying taxes, so there was chaos. For the last 10 to 15 years, there has been a lot of discussion and arguments between licensed and unlicensed operators. A lot of people, including politicians, did not understand the difference. Now, since 2017, when the gambling market was regulated, most of the operators are licensed. We can see people realise we contribute a lot of money to different sports through sponsorships and further business.

I would say the perception is getting better and better, even though it's a pretty young industry. The state now has its own online casino. It was launched in December 2018 and is owned by the government. Legislation does not allow them to advertise.

We don't have so many discussions about responsible gambling like in the UK. I can see a lot of differences between the two markets. In Poland, it's all about taxes. The government is more interested in handing out licenses and getting as much tax as possible, while in Malta and the UK, we see more of an approach towards responsible gambling and AML. It's different, but we do need to do a lot of work here in Poland to explain to people that sports betting is more about your knowledge and is less of a gamble than casino games present.

At the start of the year we learned of STS' plans to expand outside of Poland. How have those developed?

We launched projects in February and spent a lot of time building the teams and structures and putting all the procedures in place, but it's actually very interesting for us. Half our database in the UK is made up of Polish people; it's very easy for us to tap into that market and acquire new Polish customers. They all know us and it was always our plan to first approach Polish players.

We also realise all these markets are completely different, so you need a different approach in each one. But the good thing is, once you become an international company and build the business you can start to improve in your home market. In Poland, we have a lot of new technology and new marketing approaches. I think next year will be even more important to us.



GIVING BACK TO THE PLANET

Inovatiq CEO **Sirp de Wit** speaks to **Tim Poole** about affiliate MrCasinova.com and its new charity drive

Can you give us an introduction about yourself and MrCasinova.com?

I'm the CEO of Inovatiq Limited, which is a lead-generation company, primarily focusing on the casino affiliation sector. We are currently live in seven markets. In those markets, we have casino affiliate assets, like organic search, to direct traffic to operators. One of these projects is MrCasinova.com. It's a fairly new one; the website has been live for five or six months. In the last two months, we have started marketing it, working with PR companies, pushing content out to get incoming links to increase the rankings – simple as that.

One of the things we connected to that was a charity angle. This was for a few simple reasons: the charity angle is that for every new player we send, we donate £1 (\$1.28) to an environmental fund. Why do we do this? We believe in giving something back to this planet.

What was the thinking behind undertaking this initiative?

Obviously, we have to think about the bottom line, but I believe we can also connect some goals to it and not only care about revenue. I see, from an organisational and morale boost point

of view, people are very happy with these goals. They now know there's added value to getting more players in.

From a PR perspective, it obviously also works. Right now, we are sending players; the numbers are low but our goal is to send hundreds, if not thousands, a month in 12 to 16 months. We'll donate the money we generate from that to charity. It's not set which charities they are yet and it's also up to the public to get to us and see which ones they want to promote.

We are currently live with Mr Casinova and directly targeting six markets: Germany, Finland, Norway, Sweden, the UK and Canada. In 2019, the number won't be that big as we just started. But, in 2020, we're aiming for a significant amount to be donated to charity.

What are your projections for both the site and how much you aim to raise for charity?

We've been live for six months and only really started working from a market perspective the last two months. Truth be told, there will be something handed over to charity at the end of this year, but it will be a small amount. What I'm aiming for at the end of 2020 is the one that is more interesting. I would say, in 12 months from now, we will be disappointed if it's less than 500 players a month. Obviously, that number needs to be higher than that. For the full year, that could then be a significant amount; hundreds, if not thousands, per month.

Are there any similar examples currently in place within the affiliate sector?

I'm sure there are many lead generation or affiliate companies donating to charity. But I am not aware of anyone publicly putting out a statement they will donate X if they make Y. I have been brainstorming for a number of weeks with the team about how we should do it. This way, it is a little more transparent and is connected to a hard KPI. I have not seen it directly communicated, as we do, by competitors.

Do you think this kind of campaign can change the perception of the affiliate industry?

Again, the overall effect will be small there, but I think it will change the mindset, yes. I think the casino industry itself is still seen as something not everybody wants to touch, from a media perspective. I believe this sort of initiative will create a little bit more of a positive mindset if people do it more. It's not all about the bottom line. Even if the amount might be limited, it's still a good initiative.

The main reason we came up with it, from a company perspective, was because we wanted to connect some more corporate goals besides concentrating on the bottom line. I'm not stating this is going to change anything; I understand that. It's a small initiative.

But I think all the small initiatives together will help and that's what we're trying to do here. It's a very cluttered industry, with a lot of fantastic products. But, at the same time, we wanted to connect some softer KPIs there that reward the planet in a way. It's not all about the bottom line.



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PLAY HARD

Mark Baker, Marketing Director at ActiveWin, speaks to **Owain Flanders** about his childhood dream job, zombie survival plans and his tactic for eating a Terry's Chocolate Orange

Founded in 2012, ActiveWin's aim is to target, acquire, retain and up-sell customers through its digital campaigns. Since its early beginnings, the supplier has adapted its offering to include a number of channels and a variety of digital products. Although ActiveWin has customers in various industries, including finance and travel, it also holds a number of clients within the gambling industry, such as Totesport, Prospect Hall Casino and Betfred. Most recently, the supplier secured a partnership with rugby's Super League champions Wigan Warriors, which will see the company provide customer support and fan engagement services to the club's customer base.

Mark Baker has spent almost four years as ActiveWin's Marketing Director following a six-year stint as Head of Media for the company. Prior to this, he spent more than a year working at Betfred as Head of Performance Marketing. Boasting a long career within his field of expertise, it is evident Baker knows how to entice customers and get the best out of a brand, but what about the man behind the working life?

In the latest in our Play Hard series, Baker talks to *Trafficology* about superpowers, scary films and world records, as he gives us a glimpse into his life outside marketing.

WHEN YOU WERE A CHILD, WHAT DID YOU WANT TO BE WHEN YOU GREW UP, OR HAVE YOU WANTED TO BE A MARKETING DIRECTOR SINCE THE DAY YOU WERE BORN?

When I was very small, I think I wanted to be a pilot because my dad worked in the aerospace industry.

WHAT'S ONE PIECE OF LIFE ADVICE YOU WOULD GIVE 10-YEAR-OLD MARK IF YOU HAD THE CHANCE?

Learn the financial markets.

IF YOU COULD HAVE ONE SUPER POWER, WHAT WOULD IT BE, AND WHAT WOULD BE YOUR SUPERNAME?

I think I would go for super strength. I'll have to have a think about the name!

SINCE HALLOWEEN IS ON THE HORIZON, WHAT'S YOUR FAVOURITE SCARY MOVIE?

I think *Saw* was a really good one.

IMAGINE YOU ARE IN A SCARY MOVIE. THERE IS AN AXE MURDERER BREAKING INTO THE HOUSE AND YOU CAN PICK ONE PERSON IN THE WORLD TO TEAM UP WITH. WHO WOULD YOU PICK?

I think I would go for a fictional character and I'm going to go pretty old school. Daniel LaRusso - the Karate Kid.

NOW, SAY YOU WALK INTO THE ACTIVEWIN OFFICE ONE DAY AND NO ONE IS THERE. THERE'S BEEN A ZOMBIE APOCALYPSE AND YOU'RE ALL ALONE. WHAT WOULD BE YOUR METHOD OF SURVIVAL?

Build an arms cache first of all. Then get lots of water and lots of tinned goods. Make sure I've got lots and lots of guns and maybe swords as well, and if you've got a chainsaw too, why not?

WE'VE BEEN A BIT OBSESSED WITH GUINNESS WORLD RECORDS IN THE TRAFFICOLOGY OFFICE OF LATE. THE WORLD RECORD FOR EATING A TERRY'S CHOCOLATE ORANGE IS ONE MINUTE AND FIVE SECONDS. HOW FAST DO YOU THINK YOU COULD EAT ONE?

I think I could eat one in 54 seconds.

IMPRESSIVE. SO YOU THINK YOU'RE ON WORLD RECORD PACE?

Sure, why not? I'd eat it like a snake.

IF YOU HAD ONE SHOT TO BREAK A WORLD RECORD, WHAT WOULD YOU ATTEMPT?

I think I'd have a good go at making the world's longest shot put throw. If I could go for that, that'd be great.

FINALLY, WOULD YOU RATHER BE THE TALLEST MAN IN THE WORLD AT 8 FEET 11 INCHES, OR THE SMALLEST MAN AT 21.5 INCHES?

21.5 inches? That is small!! I think I would go for the smallest man in the world because then you've always got somebody to look up to.





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