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OCTOBER 2019

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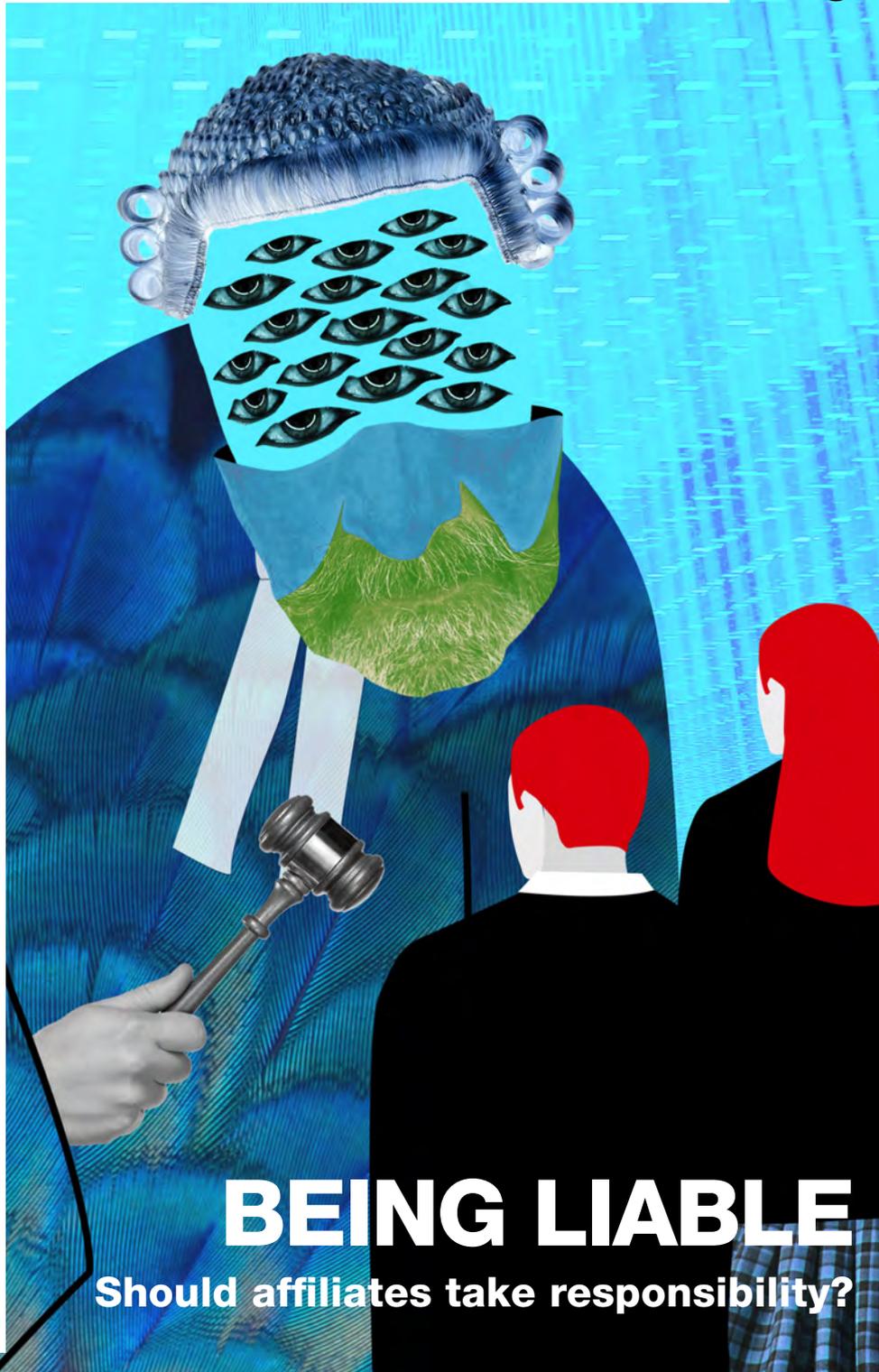
AFFILIATE FOCUS BY GAMBLING INSIDER

OCTOBER 2019

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Should affiliates take responsibility?

bet365 Affiliates



A WORLD OF
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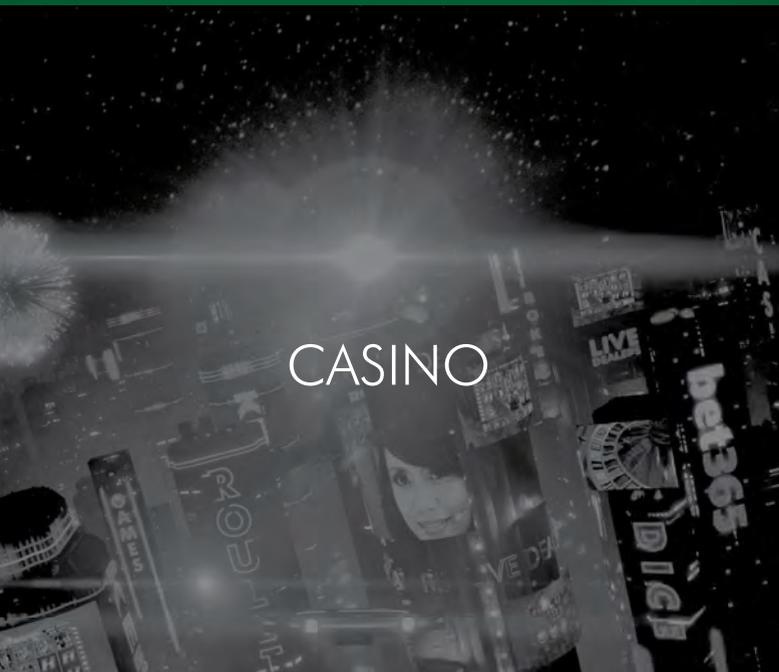
SPORTS



VEGAS



POKER



CASINO



BINGO



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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. The following tables show the top 20 affiliate programs by vertical for H1 2019 in comparison with H2 2018.



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



OVERALL

Rank	+/-	Name	Website
1	-	Bet365 Affiliates	bet365affiliates.com
2	-	NetHive Affiliate Program	nethive.com
3	5▲	IQ Option Affiliate	affiliate.iqoption.com
4	1▲	Betfair Partnerships	affiliates.betfair.com
5	1▼	Kindred Affiliates	kindredaffiliates.com
6	1▲	William Hill Affiliates	affiliates.williamhill.com
7	4▼	Yahoo Fantasy Sports Affiliates	sports.yahoo.com/dailyfantasy/affiliates
8	1▲	Affiliate Hub	affiliatehub.skybet.com
9	3▼	Parimatch Affiliates	affiliates.parimatch.com
10	3▲	Best Partners	bestpartners.com
11	1▼	1xBet Partners	1xpartners.com
12	-	Stoiximan.gr Affiliates	affiliates.stoiximan.gr
13	6▲	U-affiliates	uffiliates.com
14	-	Betin Kenya Affiliates	affiliates.betin.co.ke
15	-	FDJ Affiliate Program	www.fdj.fr
16	11▲	Tipsport Partners	tipsport.cz/partner
17	12▲	Planetwin365 Affiliates	affiliates.planetwin365all.com
18	1▼	Fortuna Affiliates	fortuna-affiliates.com
19	2▲	Favorit Affiliates	affiliates.favorit.com.ua
20	4▲	Sportingbet	sbaffiliates.com

CASINO

Rank	+/-	Name	Website
1	1▲	KeyAffiliates	keyaffiliates.com
2	3▲	Bet365 Affiliates	bet365affiliates.com
3	2▼	Almor Affiliates	almoraffiliates.omarsys.com
4	2▲	Gamesys Affiliates	gamesysaffiliates.com
5	2▼	Affiliate Hub	affiliatehub.skybet.com
6	6▲	U-affiliates	uffiliates.com
7	-	Deckmedia Affiliates	deckmedia.im
8	-	Buffalo Partners	buffalopartners.com
9	1▲	William Hill Affiliates	affiliates.williamhill.com
10	12▲	WinBet Affiliates	winbetaffiliates.bg
11	-	LeoVegas Affiliate	leovegasaffiliates.com
12	22▲	Income88	income88.com
13	7▲	JPJ Group Affiliates	jpgroupaffiliates.com
14	-	Kindred Affiliates	kindredaffiliates.com
15	6▼	Revenue Giants	revenuegiants.com
16	1▼	Mr Affiliate	mraffiliate.com
17	4▼	Lapalingo Affiliate Program	lapalingo.com/en/affiliate-program
18	2▼	Gaming1 Affiliates	affiliates.gaming1.com
19	-	Gwages	gwages.com
20	3▲	Best Partners	bestpartners.com



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SPORT

Rank	+/-	Name	Website
1	-	Bet365 Affiliates	bet365affiliates.com
2	-	NetHive Affiliate Program	nethive.com
3	2▲	Betfair Partnerships	affiliates.betfair.com
4	1▼	Parimatch Affiliates	affiliates.parimatch.com
5	1▼	Affiliate Hub	affiliatehub.skybet.com
6	-	Marathonbet Affiliate	affiliates.marathonbet.com
7	-	Betin Kenya Affiliates	affiliates.betin.co.ke
8	-	Stoiximan.gr Affiliates	affiliates.stoiximan.gr
9	-	Kindred Affiliates	kindredaffiliates.com
10	-	1xBet Partners	1xpartners.com
11	2▲	William Hill Affiliates	affiliates.williamhill.com
12	2▲	Tipsport Partners	tipsport.cz/partner
13	1▼	Tipico Affiliate Program	tipico.com/en/affiliate-program
14	3▼	Fortuna Affiliates	fortuna-affiliates.com
15	2▲	Planetwin365 Affiliates	affiliates.planetwin365all.com
16	1▼	Favorit Affiliates	affiliates.favorit.com.ua
17	1▼	Best Partners	bestpartners.com
18	1▲	PMU.fr Partners	partners.pmu.fr
19	3▲	AfliadosW	afliadosw.co
20	-	Sportingbet	sbaffiliates.com



BINGO

Rank	+/-	Name	Website
1	-	Tombola Affiliates	tombola.co.uk/affiliate-programme/
2	1▲	Gamesys Affiliates	gamesysaffiliates.com
3	1▼	U-ffiliates	uffiliates.com
4	2▲	Mecca Affiliates	meccaaffiliates.com
5	2▲	Rank Affiliates	www.rankaffiliates.com
6	2▼	Affiliate Hub	affiliatehub.skybet.com
7	2▼	Gala Partners	galapartners.co.uk
8	1▲	Revenue Giants	revenuegiants.com
9	1▼	Broadway Gaming Affiliates	broadwaygaming.com
10	2▲	LuckyJar Affiliates	luckyjar.com/uk/
11	4▲	Bingo Partners	bingopartners.com
12	1▲	Quickthink Affiliates	quickthinkaffiliates.co.uk
13	2▼	Kindred Affiliates	kindredaffiliates.com
14	2▲	Tau Affiliates	www.tauaffiliates.com
15	5▼	NetHive Affiliate Program	nethive.com
16	4▲	William Hill Affiliates	affiliates.williamhill.com
17	4▲	Bingo Reward UK	bingoreward.co.uk
18	-	The Bingo Affiliates	thebingoaffiliates.com
19	5▼	Bingocams Partners	bingocamspartners.com
20	5▲	Vista Gaming Affiliates	vistagamingaffiliates.net



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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POKER

Rank	+/-	Name	Website
1	-	Stars Affiliate Club	starsaffiliateclub.com
2	-	U-affiliates	uffiliates.com
3	3▲	WPN Affiliates	wpnaffiliates.com
4	1▼	Winamax Affiliates	winamax.fr/en/affiliates
5	1▼	Affiliate Hub	affiliatehub.skybet.com
6	1▼	GVC Affiliates	gvcffiliates.com
7	1▲	Bet365 Affiliates	bet365affiliates.com
8	1▲	IDN Partners	idnpartners.com
9	1▲	Shen Affiliates	shenaffiliates.com
10	1▲	Commission Kings	commissionkings.ag
11	3▲	Punto Scommesse Affiliations	puntoscommesse.it
12	11▲	GGPoker Affiliates	partners.ggpoker.com
13	1▼	Kindred Affiliates	kindredaffiliates.com
14	1▲	Royal Stakes	royalstakes.com
15	8▼	The Spartan Poker Affiliate Program	thespartanpoker.com/affiliate/overview.html
16	3▲	William Hill Affiliates	affiliates.williamhill.com
17	31▲	GreySnow Poker Affiliates	greysnowpoker.com/en/affiliates/affiliates-intro/
18	1▼	Intertops Affiliates	intertops.eu/affiliate
19	8▲	Black Chip Poker Affiliates	affiliates.blackchippoker.eu
20	-	PMU.fr Partners	partners.pmu.fr



FINANCIAL

Rank	+/-	Name	Website
1	1▲	IQ Option Affiliate	affiliate.iqoption.com
2	1▼	EToro Partners	etoropartners.com
3	1▲	XM Partners	partners.xm.com
4	1▼	BinPartner	binpartner.com
5	1▲	IG Markets Partners	ig.com/uk/affiliates
6	1▲	The Plus500 Affiliate Program	500affiliates.com
7	1▲	Binary.com Affiliate Program	affiliates.binary.com
8	3▼	KingFin	kingfin.com
9	2▲	IC Markets Affiliate Program	icmarkets.com/partnerships/affiliate-program
10	1▼	Libertex Affiliates	libertex-affiliates.com
11	1▼	Forex Club Affiliate	fxclub.org/affiliate/
12	-	Alpari Partners	alpari.com/en/company/partnership
13	-	Affiliate Partners	affiliate-partners.net
14	5▲	Nadex Affiliate	nadex.com/affiliates
15	2▲	Exness Partner	exness.com/partnership/
16	-	FXTM Partners	fxtmpartners.com
17	3▼	InstaForex Affiliate Program	partners.instaforex.com
18	-	HotForex Partners	hffaffiliates.com
19	2▲	Forex4you Partners	forex4you.com/en/partners/
20	2▲	Gain Affiliates	gainaffiliates.com



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AFFILIATE MARKETING: DOES THE GAMBLING COMMISSION NEED TO JUMP IN?

Matthew Enderby asks if the Gambling Commission should become further involved with the regulation of affiliates in Great Britain

The affiliate-operator relationship has been extensively examined at conferences around the world, in the pages of *Trafficology* and in the offices of marketing standards authorities. But should the Gambling Commission take more of a lead when it comes to affiliate practices? Would that ease or heap the pressure on the partnerships between operators and affiliates?

Operators are effectively outsourcing a portion of their marketing efforts when they sign deals with affiliates. There are obviously big players that can manage the process more closely by running a specific affiliate arm.

But when operators do go completely outside their own businesses to benefit from an affiliate's pull, why does the responsibility not travel with it? The Advertising Standards Authority (ASA) governs advertising in the UK and says when it comes to non-broadcast affiliate marketing for gambling products, primary responsibility for observing the Committees Advertising Practice (CAP) Code remains with the operator.

This means marketing materials created by affiliates must stick to the ad rules, otherwise the operator may be held wholly or jointly responsible. This includes observing the general rules on misleading and promotional marketing, as well as sector-specific

rules and database practice requirements, such as when the need to demonstrate explicit content has been provided by the recipient of affiliates' email marketing.

When their processes are boiled down, what affiliates do is advertise. They expand the reach of an operator, bring in new customers and retain existing players by reinforcing messages. As a result, it is only logical the ASA takes the lead when investigating irregularities or breaches in code. But due to the complex and often strained relationship between operators and affiliates, it is essential the Gambling Commission becomes more involved.

On its website, the Gambling Commission highlights sections of the CAP Code administered by the ASA. Most of the links take the browser to the ASA's website, when it should be providing its own clear assessment of the issues at hand.

In June, advertisements for LottoGo EuroMillions, William Hill Vegas, Betfair Bingo and Dunder were banned by the ASA. The advertising authority said the operators failed to ensure the ads were not directed at children. The ads appeared on the Looney Tunes World of Mayhem app in February - a game based on the Warner Brothers cartoons.

The app provided players with the chance to earn in-game gems by viewing adverts or performing tasks. The ads in question were found to be in breach of the CAP Code, section 16.3.13. This section states marketing communications for gambling must not be directed at those aged under 18, through the selection of media or the context in which they appeared.

LottoGo, Dunder and Betfair said their adverts were placed by affiliate Tapjoy and have since terminated their contracts with it. William Hill said it has blacklisted the app and would not advertise in it through Tapjoy or any other affiliate. The operator of the app itself also accepted blame for the complaints caused, as it had been marked to display "mature gambling" marketing. This was reportedly done in error and has since been corrected.

The whole situation here is a mess as a result of liability being passed on. All the companies involved seemed eager to shift blame and claim it was someone else's problem. It was an occasion where it appeared the ASA needed the backing of the Gambling Commission.

Regulation will be ramped up if stories like this continue to happen across the gambling industry. But perhaps that is inevitable if the Gambling Commission does not become further involved with affiliate marketing. It seems Tapjoy and the operators involved with the Looney Tunes incident have walked away from the issue with the sense none of them have done much wrong.

A month later, in July, the Gambling Commission felt the need to step in and address a different matter. It issued a statement on free-to-play games being available through gambling affiliates. It said it had been made aware licensed operators may be benefitting from affiliate advertising models which offer free-to-play versions of real-money games on their websites without the necessary age verification taking place.

Changes to the Commission's license conditions and codes of practice (LCCP), enacted on 7 May, mean remote licensees must ensure they have verified the age of any player before they can access free-to-play games.

The Commission outlined how this can affect both affiliates and operators. It said: "Where a B2B [supplier] uses an affiliate to advertise a free-to-play version of one of its own games, and that game is accompanied by hyperlinks to B2C operators who make the real-money version of that game available, those hyperlinks serve to drive consumer traffic towards the B2Cs.

"The B2C operators will therefore be responsible for ensuring that the free-play version on the affiliate website cannot be accessed by customers who have not been age verified, or otherwise that they dissociate themselves from the advertisement."



A call for an extra regulatory body may seem counter-intuitive here, especially when its explanations are as long-winded as the above quote. Adding another cook to the kitchen does not necessarily mean a tastier broth and it certainly will not expedite the process. But a big picture perspective is necessary.

The public rhetoric around gambling is not healthy or positive and to see ads for sportsbook and lottery services interjected into games designed for children is not helping. It is essential the guilty party, whoever that may be, faces the consequences of its actions and removes any perception it is getting away with its mistake.

What does the future hold for the regulation of affiliate marketing? It is important for operators and their affiliate marketers to be on the same page and have open, continuous and honest dialogue. In the case of any ads being placed and seen where they should not be, all guilty parties need to own up to their mistakes.

**"THE B2C OPERATORS WILL THEREFORE BE RESPONSIBLE FOR ENSURING THAT THE FREE-PLAY VERSION ON THE AFFILIATE WEBSITE CANNOT BE ACCESSED BY CUSTOMERS WHO HAVE NOT BEEN AGE VERIFIED, OR OTHERWISE THAT THEY DISSOCIATE THEMSELVES FROM THE ADVERTISEMENT"
- GAMBLING COMMISSION**



AFFILIATES AND OPERATORS: WHO SHOULD BE LIABLE?

At a time when the gambling industry is being firmly watched, **Nathan Joyes** looks into the responsibilities of both the operator and affiliate

Operators and affiliates are highly dependant on one another. But when things go wrong, who is liable and can this potentially put a strain on the relationship?

In the past 12 months, Great Britain has had one hand tied behind its back, as the gambling industry has become one of the most controversial industries.

It isn't the only market which has suffered. Italy's blanket ban on gambling advertising and sponsorship, as well as the strict new regime in Sweden, are both examples those in charge are running a very tight ship at present.

The US market is slowly opening up, as individual states are legalising sports betting and online gaming. But it would be naïve for both operators and affiliates to push their luck, as the American Gaming Association (AGA) has

already published a responsible marketing code for sports wagering.

If an affiliate or operator fails to be compliant, this can lead to fines or even licenses being revoked.

Katy Stafford, Head of Affiliates at operator ComeOn, believes there should be a shared responsibility between the operator and affiliate in certain situations.

She says: "I think affiliates and operators should be working in a partnership, and as such, if an operator gets fined for the actions taken by their affiliate partner, whether it is non-compliant messaging, targeting under 18s etc., then the consequences should be shared."

Despite recognising the responsibility should be equal, Stafford explains operators have put trust in their affiliates to deliver and if they

are briefed beforehand, affiliates have to accept a certain level of responsibility.

The Gambling Commission has strict rules and regulations to ensure all operators and affiliates are working appropriately. Operators are fined for the actions taken by their affiliate partner, whether this is for compliant messaging, underage gambling etc.

With operators being the ones to face the consequences when their affiliates make mistakes, their communication with affiliates is key to avoiding any kind of punishment.

Stafford says: "If an operator has communicated the changes necessary, then the affiliate must abide by these rules and update their content accordingly. This goes hand-in-hand with the trust given to affiliates by the operator. It's not a one-way street and we have to work together to ensure regulations are upheld."

But this doesn't mean operators are the only ones which are required to be up to date with the latest developments in the gambling industry. Affiliates also need to be in the know about what is required of them from both the Gambling Commission and the Advertising Standards Authority (ASA), and not merely rely on instructions from operators and take what is said to them as gospel.

This is where affiliates can prove they are worthy partners, if they are to spot any mistakes which may have been missed by operators. Terms and conditions are updating all the time and this could be missed by an operator.

Operators and affiliates must also embrace compliance requirements together to protect potentially vulnerable players.

Stafford explains operators aren't there to trip up affiliates. She says: "Affiliates should be well aware of the rules. They should be reading the forums and industry news to be proactive in their business rather than reactive. If they aren't sure, it's always best to err on the side of caution or reach out to their affiliate program and ask what is correct and what isn't. We are here to help, not penalise."

What needs to be clear is regulation isn't the same in every jurisdiction. This is where operators do in fact need to take the lead when outlining marketing materials to affiliates.

Stafford says: "Operators who are working in regulated markets have to take the upper hand in the education of affiliates. It shouldn't be a case-by-case basis, but rule of thumb for all."

Affiliates' behaviour can lead to an operator having its license revoked, which is why affiliates have to be thorough.

Robert Wakeham, Head of Affiliates at Betway, disagrees with Stafford, explaining it is the operators who are responsible and should be held accountable.

Speaking at the London Affiliate Conference earlier this year, he said: "The responsibility is on the operator to educate the affiliate and make sure they understand how to act within the market. I think that is fundamental."

"As operators, we should see the responsibility is on us to educate and improve communication to ensure these issues do not become major."

Operators need to protect their brand. This doesn't necessarily mean an operator has to watch its affiliate like a hawk, or monitor it 24/7, as there needs to be a level of trust for the affiliate to carry out its duty. But regularly checking in, with clear communication and guidelines, is what the affiliate expects from the operator to sustain a healthy relationship.

This, alongside understanding compliance requirements, will help to keep both operators and affiliates from finding themselves on the wrong side of the law, leading to fines and worst-case scenario, licenses being revoked.

Stafford believes clear terms and conditions outlined in digital guidelines can only help this.

She says: "We make our terms and conditions readily available on our website and any updates are communicated to our affiliate database as and when they happen. As long as the operator is



KATY STAFFORD

clear in their messaging to affiliates, and to the regulators, then everything in theory should be fine."

Certain operators are being proactive and using software such as Rightlander, which can detect and reduce the risk of illegal or non-compliant activity and checks affiliate compliance across multiple territories.

Stafford says: "This helps to reduce time detecting any illegal activity themselves, freeing up employees to work on other pressing issues. We currently utilise Rightlander and we also have a full-time compliance manager in our team to ensure all the affiliates we work with are compliant."

Operators and affiliates should be working together at a time when the magnifying glass is firmly being held up to the gambling industry. With the latest technology which can spot any glaring errors or information which is not compliant, there are no excuses from either side for mistakes to be made. If neither operator nor affiliate gives regulators a reason to slap their wrists, the industry can continue to go about its business.

"AFFILIATES SHOULD BE WELL AWARE OF THE RULES. THEY SHOULD BE READING THE FORUMS AND INDUSTRY NEWS TO BE PROACTIVE IN THEIR BUSINESS RATHER THAN REACTIVE. IF THEY AREN'T SURE, IT'S ALWAYS BEST TO ERR ON THE SIDE OF CAUTION OR REACH OUT TO THEIR AFFILIATE PROGRAM AND ASK WHAT IS CORRECT AND WHAT ISN'T"

- KATY STAFFORD



A TYPICAL DAY IN CRM

Online gaming consultant **Shahar Attias** talks us through his daily schedule, including a pilates class, several cups of coffee and handling a relationship with an acquisitions team

07:00

I've just returned home from the gym. Sounds cool, eh? Well, actually it was just a pilates class. But you see, that's what us CRM people do - take a grain of truth, such as the connection between the terrible Swedish platform we use and proper 21st century technology, and glorify it to the maximum. We also do it in front of the players, re-selling the same online casino games again and again ("An exciting NEW slot!"), often under impossible bonus budget constraints. Are you not entertained?

07:15

I'm already dressed up, having the first coffee of the day (no need to shower before pilates) and browsing quickly through the recent news. This may come in handy, providing buzzwords in our upcoming promos.

07:30

I'm commuting to the office. I could have said I am cruising in my 911 GT2 RS, but I'm more in favour of a Lime scooter and public transport.

08:15

I haven't died in an accident. Let's see if I will remain that grateful after a management meeting later on today.

08:40

Let the games begin. I like being early, so I can get a brief headstart before the mayhem is upon us.

08:41

How come yesterday's results are never what you want them to be? We ran a cashback offering across the weekend, yet unexpected weather reminded our hardcore players there's a world outside.

You work hard, make plans, execute them perfectly - and then reality just has to ruin it for you.

09:00

I've finished compiling the analysis to present during our briefing. It wasn't that bad after all. Within those who bothered with opening the emails, we had a good click rate, and our VIPs have saved us once again.

09:10

I've just paid the active accounts more money than I make in a year. It feels good, and makes me wonder about the quality of my life and career choices. I just wish we could work in real-time and offer instant, dynamic bonuses that will be personalised according to recent activity, instead of waiting for the weekend to end before manually crediting the bonuses. Maybe we should ask our platform account manager if they can develop something like this or integrate a third-party solution. Oh, it's early August - no one will answer in Sweden for several weeks now.

09:30

Time for a management meeting with our fearless CMO, Head of VIP, our Analyst and the woman who is now running marketing execution. I'm here because someone has to be blamed for everything. It feels like being married - but only between Monday and Friday. God, I could use a large coffee right now with some Baileys in it.

My presentation went well, apart from the usual passive-aggressive "I had big hopes for this weekend, such a shame" from the Chief Moaning Officer, but any other kind of response from his side would have rushed me over to check his pulse, so it's all good. On to the more important part: VIPs.

Our top players actually make nearly all our profit by themselves, so it's crucial to pay all possible attention to their activity. In CRM, we love our account managers, even if they are occasionally a bit too cocky (they claim it has nothing to do with being arrogant - they are just so successful). I hate it when other people are right.

We are currently implementing a new way to segment these super players, based on dynamic RFM, and now we all review together the first-ever retention ratios. Considering the running 30 days were in fact during high summer time, it's actually quite amazing so many of them have remained so engaged. I have agreed to schedule a follow-up session with their team to help with creating personalised deals for the remaining weeks before September.

We have also tried to prioritise the monthly tasks of our internal marketing communication resources. The people from acquisition think it's not fair they can only use 130% of the designers' and content writers' time, and in general, they fail to understand why anything that happens after the first deposit has any importance. In their eyes, the priority ranking of CRM requests should be non-existent.

10:30

After being so productive, I just had to crawl outside to buy a decent double espresso. Just to clarify - I am not addicted. In fact, I don't even enjoy drinking coffee, and can stop at any point. Here's my resolution: I am indeed going to stop, as soon as the workload will be reduced to a level that makes at least some sense, or I will get a payrise. Whichever of these two fictional targets comes sooner is fine.

10:45

Welcome to the factory. For the next two hours, I will be pulling reports, segmenting targeted groups, creating bonuses, uploading translated texts, scheduling campaigns and wondering if there any cons with getting hit by a car.

13:00

Lunchtime; my body is a temple, and I worship it with BK (That's beetroot and kale - not Burger King).

13:30

Emails for the mid-week campaigns are about to be sent, but the regulator has decided that ever since this morning, online casinos aren't allowed to earn money or something along those lines. Albert Einstein once said: "You cannot beat a roulette table unless you steal money from it." Well, they are following this to the dot, as they keep changing the rules, to a point in which we are guilty unless proved otherwise.

Enter crisis mode. Everything must be rewritten, redesigned, retranslated and go through compliance. Bring it on.

15:30

I'm now done with the quick fixes, and managed to do it with only one more cup of office coffee (I suspect a higher dosage would have killed me). Now I'm off to the "strategic planning" part of the day. We work out the parameters to define any new micro-segments with BI, agree on group-relevant bonus/NGR ratios with the VIP AMs and upload the briefs to the mar-comms department. Easy.

17:00

I was about to go back home already, when the CEO decided to step into our department and really care about what we do. If there are any operational issues we are facing, he would love to help us sort these. Dude, you have small kids at home; stop trying to avoid getting back in time for dinner

18:00

Finally, we have disappointed the CEO enough (maybe this job is exactly like being married), so he leaves trying to find another excuse for his long working hours. I have my last coffee of the day, as all that is left to do is ensure the front-end is fresh with all the big winners, tournament leaderboards are set and just a final quick look at today's results so far and how the month-to-date KPIs benchmark with those of August last year.



SHAHAR ATTIAS

19:00

I'm calling it a day, which in CRM language means I am taking the laptop with me to do some work from home, and feeling super cool about it. A thought comes to my mind: the only way this could be even cooler, is if I will take advantage of the Happy Hour's last order and work next to a freezing beer. As I enter the pub across the street, the entire acquisition team is already on their way out after having a few too many and leaving me only with the bar tender and people who haven't showered in 2019.

After all is said and drunk, I wouldn't replace online gaming CRM with anything else, as we are the rockstars of the industry. Bow to us, or stick to your lousy 15% natural conversion. Tomorrow is another identical day.

Shahar Attias is one passionate iGaming CRM expert, with decades of experience in senior operational roles. He is the founder of Hybrid Interaction Ltd., the premier online gaming consulting firm, with already dozens of successful projects across all verticals and through most jurisdictions, including online migration projects with brick-and-mortar casinos in the Dutch, Swiss and the US markets. Among his clients are GVC Holdings/BwinParty/Sportingbet, PokerStars, William Hill, BetConstruct and NightRush, yet surprisingly enough - not you!

THE PERFECT STATESIDE PLAN



With US affiliate marketing very much alive and kicking, **Tim Poole** examines what it will take to stand out in the sector

The magnitude of the opportunity facing affiliates in the US was best summed up by Catena Media US General Manager Michael Daly. In the July edition of *Trafficology*, all those weeks ago, he said: "Catena had said previously the goal was for no country to be more than 10%. Then our CEO will say, 'unfortunately, I can't hold that to the US.'" In other words, throw all your preconceptions about the affiliate industry out the window – and put all your global affiliate strategies on pause. The US is too big to ignore.

Since the overturning of PASPA in May 2018, a flurry of states have legalised sports betting and, while the number of states with regulated mobile wagering remains small, a buzz has permeated through US gaming. States like New Jersey and Pennsylvania, which now boast both digital sportsbook and casino offerings, have already shown such promise it will be difficult for any affiliate not to at least consider entering the US.

As Daly alluded to, Catena CEO Per Hellberg has already confirmed the affiliate's US revenue exceeds 10% of overall group revenue streams. Jesper Søgaard, Better Collective CEO, has also projected the affiliate's US operations will likely be the biggest growth driver in the coming years. The list doesn't end there, with Gambling.com Group CEO Charles Gillespie expressing his desire to move his company's focus away from the UK market and towards the US.

For Andy Scott, Account Director at another affiliate prioritising the US, Digital Fuel Marketing, it's a very similar situation. He tells *Trafficology* the company expects the US to be its biggest revenue driver within three years.

Scott says: "Since gaining our vendor status in New Jersey in 2017, our ambition has remained the same: to establish a US-facing agency that can support clients with a sound understanding of the local market, while capitalising on many years of real-money marketing experience across international gaming jurisdictions.

"We've been cementing relationships within the local media and affiliate space while developing our own network, to learn more about how consumers are reacting to the changes and working on concepts and strategies to engage and convert."

Of course, Digital Fuel, Catena, Better Collective, Gambling.com and any others looking to play a leading role in New Jersey, Pennsylvania et al will face numerous challenges in their pursuit for market share. It won't just be a case of turning up and sticking a flag in the ground, that's for sure. First, as Scott points out, the size of the market in itself is something affiliates must get to grips with quickly.

"An obvious starting point is the size of the market," he explains. "Due to state regulation, only a handful of opportunities to monetise US traffic with real-money operators exist and the

compliance challenges mean user journeys are fragmented. Delivering meaningful content and conversion funnels that not only maximise this opportunity, but also capitalise on traffic from those states yet to regulate, is a challenge."

Then there's the cost. If you've ever holidayed in the US, you'll realise things don't come cheap. Naturally, it's no different in the affiliate sector. Scott uses Pennsylvania as an example of a state with higher fees and tax rates, while he warns "initial indications" from other jurisdictions close to regulation suggest they may set "significantly higher fees."

It's very much a case of speculating to accumulate within the US, as there are no shortcuts or loopholes around tight regulation. As discussed in greater detail by a panel at iGB Live (see p20), regulation also varies across states, ensuring affiliates must demonstrate an unblemished portfolio if they want to earn multiple licenses.

That could well mean the biggest barriers to entry are simply size and availability of capital. Catena and Better Collective have already flexed their M & A muscles within the US; in March 2018, Catena acquired New Jersey-based BonusSeeker.com, while Better Collective purchased 60% of RotoGrinders shares for \$21m earlier this year, with a view to acquiring the remaining 40% between 2022 and 2024. Since then, Better Collective has also taken over US sites VegasInsider.com and ScoresandOdds.com for \$20m.

"This is an inevitable part of market regulation and a sensible move for the acquiring companies," Scott says. "Any investment into the US should be done with a view to long-term rewards. We believe gaining access to these audiences early, either organically or through acquisition, and understanding user behaviour and sentiment, testing messaging and content strategies, will ultimately reap dividends as the market grows."

With such stiff competition already evident however, one wonders whether it's truly possible to stand out in a market everyone will inevitably have their eye on. If the

**"WE BELIEVE GAINING ACCESS TO THESE AUDIENCES EARLY, EITHER ORGANICALLY OR THROUGH ACQUISITION, AND UNDERSTANDING USER BEHAVIOUR AND SENTIMENT, TESTING MESSAGING AND CONTENT STRATEGIES, WILL ULTIMATELY REAP DIVIDENDS AS THE MARKET GROWS"
- ANDY SCOTT**

most influential US affiliates, proven over time, are slowly being acquired by the biggest players in the market, what chance does everyone else have?

Scott feels there is still hope if quality trumps quantity, suggesting the conundrum of how to stand out is not something "uniquely US." The Digital Fuel Account Director advocates taking the time to examine the intricacies of the market and identifying a niche.

A localised content strategy and product proposition must also be developed with the aim of being best in class; there can be no airlifting of European ideas and systems. He adds: "Setting realistic objectives against budgets both for the long-term development of your brand and short to medium-term financial KPIs is important for what is a dynamic space, albeit a slow-moving one."

It will no doubt be fascinating to observe how affiliates battle it out as more states legalise mobile wagering. You could almost compile a list of odds for the companies themselves as to who comes out on top. Catena 4/5 favourites, perhaps, with Better Collective second in the running at evens? With so much to consider, Scott believes the market requires patience, but sees "phenomenal" revenue growth potential.

As he points out, the sports betting market already exists within the US, in terms of states where the vertical is regulated. Now though, is the time for affiliates operating within the law to strike: "Based on what we have seen in New Jersey, in terms of appetite for online sports betting and casino, I think it's safe to say if you are patient and looking at the US market strategically over the next three to five years, the opportunity for serious revenue growth is phenomenal. We are now in a position to take what has been learned in other regulated markets and develop a safe and socially responsible online gaming industry for the benefit of all interested parties."

Looking at the first 12 months of online gaming revenue figures in New Jersey, Scott isn't wrong. Now the biggest questions are: how much can affiliates make the space their own? Who will be the sector's biggest winners? An exciting journey of discovery lies ahead.



ANDY SCOTT



US: FOLLOWING THE RULES

Panellists at this year's iGB Live discuss legalised US sports betting and how affiliates can fit into the model across different state markets

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SPEAKERS:

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Brean Wilkinson, Product Advisor, Rightlander

Melissa Blau, Director, iGaming Capital

DG: Marketing for sports betting in the US will certainly need affiliate input and there's going to be some rules you'll have to follow that will vary from state to state. What you will find is a tremendous variance among the legalised jurisdictions. The best-case model we have seen is probably Maine and the worst-case model is the District of Columbia, because they have a single provider with a 30% hold. I'd like to ask the panel first about one of the topics I know that is going to come up with the affiliates: the American Gaming Association's (AGA) responsible marketing code.

MB: They're kind of vague. It's just not good business. It's more things like: make sure there's ample wording around non-excessive gambling and responsible gambling. It's more about just being a good person.

BW: Which we all are all the time! I had a concern. One thing in the AGA code was a directive to its members that every marketing message would include a responsible gaming message and a helpline number directory. I don't know how affiliates will be expected to do this.

MB: I was asked by a couple of operators to just check a box and say I comply with all of these. But I don't think it's anything different to what is going on in Europe - especially the UK. It's just a standard operator procedure to ensure they're abiding by what they're being held to.

WH: We're being led by our clients - not by the AGA. Our clients invest an awful lot of money in the US, spending millions and millions, hoping to succeed in this market. They want it to be worth their while and they're not interested in working with affiliates that aren't. It's a little bit more complicated than saying "I will just make sure I haven't got unlicensed operators on my sites."

They're going to be looking at your whole network. If you're not pushing traffic from the US today with unlicensed operators, you still might be pushing traffic from Germany and that is still a problem.

If you are promoting brands that are well known for being offshore and you think you're going to get away with it, you're probably not. My advice is clean up your act now, because if you're still working with those partners and you want to do well in the US, you probably need to ditch offshore unlicensed gambling operators.

MB: Here's where the problem comes in. You start up in New Jersey and think that's tough, but not impossible, then Pennsylvania and you think that's a little bit tougher. But then you get to Missouri and you get rejected. Then all of a sudden, New Jersey and Pennsylvania start looking and ask if you have you have been denied a license before. If you have, you're pretty much done getting a license. While you might get one in New Jersey and Pennsylvania, it gets increasingly harder. Just work towards the highest standard.

DG: If they used to be bad and want to be good, doesn't this factor in?

WH: It's a really good question. In the UK, we're not really given enough information from the regulators to tell us what they're going to be looking for and how they go about it, so we're being led by our clients, who think we need to be super clean. Where they go with people who have historically taken a lot of US traffic from unlicensed operators, I'm not sure, but they want that act cleaned up immediately.

BW: I want to underscore something Melissa said, which was very important. If you get rejected in one place, that can come back and haunt you in every other place. You're talking about 45 places in the US.

DG: How will it be possible to comply with all of the different regulatory streams, across the 18 or so jurisdictions currently offering legal sports betting? Do you have any idea what the expenses are going to be?

WH: Once you've acquired a licence in each state, it's not really that expensive to be honest. It's just a time issue, and it takes a long time.

MB: I also think it depends on the type of license you apply for. New Jersey and Pennsylvania both went in the same direction, allowing you to do CPA only, which is not that hard to get. But the revenue share license is very onerous. You require 10 years of tax returns, five years of credit card statements and bank statements, and this prevents you from getting into your safety deposit box for nine months. It's onerous, right? The CPA one is much simpler.

DG: One of the areas I was interested in asking about is, if you get approved in one state, have you seen any requirements that you have to be set up anywhere and have an office on the ground?

WH: No, you don't need to be within the state. If you want an ancillary license, then you need something in the state, but if you're just going for the regular one, you can be anywhere.

DG: What do you think about the breakdown of who's going to get licenses in certain states?

MB: I haven't worked in other states such as Maine; Tennessee is online only. No one else is online right now. I think that will change in the next six months. For now, it's really just New Jersey and online just launched in Pennsylvania. We're still in the early stages. What's interesting is affiliates have to be licensed in sports betting and for a casino, but oddly for online lotteries, there is no license required. One of the problems with the lotteries on the sports betting side is their tax rates are ridiculous.

DG: The US has been projected as an \$8bn market. Do you think that's a high or a low estimate?

WH: The opportunity in the US is enormous and there is no doubting that. But going in and assuming it's going to be the same as Europe and they are going to want the same thing European players want is not very smart. US players have had daily fantasy sports (DFS) now for five years or longer and they're probably used to that; they like that model and it's something that works quite well with them. To think they're just going to drop that and suddenly all want to start betting on fixed odds or change the way they go about things would be wrong. It's probably going to take a long time for that to transition.

**"WHAT'S INTERESTING IS AFFILIATES HAVE TO BE LICENSED IN SPORTS BETTING AND FOR A CASINO, BUT ODDLY FOR ONLINE LOTTERIES, THERE IS NO LICENSE REQUIRED. ONE OF THE PROBLEMS WITH THE LOTTERIES ON THE SPORTS BETTING SIDE IS THEIR TAX RATES ARE RIDICULOUS"
- MELISSA BLAU**



"FRICTION IS PRETTY MUCH WHAT KILLED THE ATTEMPTS TO DO MEANINGFUL ONLINE POKER. I DON'T THINK IT WOULD BE THAT MUCH OF A FRICTION PROBLEM" – BREAN WILKINSON

These are the things we are going to have to think about going into the US. Don't go in assuming it's going to be the same. There are all sorts of things around brand loyalty. Players are so loyal to their brands in the US; much more so than in the UK or Sweden. It's a very different model. You have to know your market. You have to go in there with the right approach and know what those players are going to be into.

Pennsylvania and Penn National soft launched with no marketing, a small bit of PR here and there, and players are turning up in their droves. Word of mouth, whatever it was; they knew it was there and they are spending a lot of money gambling. There are fantastic opportunities for you. Just go about it the right way.

BW: I suspect the offshore sportsbooks have probably seen a decline after the regulation of sports betting in certain jurisdictions.

WH: One thing you need to remember is although gambling hasn't been legal, it doesn't mean it hasn't been done. Players have all been doing it. Everybody wants a gamble. A big part of the transition into the legal world is them actually giving up what they've been used to. Because they have to verify their accounts, it's harder to get their money in and it's problematic right now. There's no real reason for players to change what they're currently doing.

New Jersey's tax rate is somewhere between 13% and 14%, but in Pennsylvania, its 36%, so it will be interesting to see how that plays out with how they treat affiliates, especially under CPA, because right now, there's just not enough information.

MB: Where mobile is available, like New Jersey and Pennsylvania, the mobile percentage of revenue is 80% to 90% mobile and 10% for the 15 land-based casinos, so it's very mobile-driven on the positive side. But on the negative side, there's no requirement for your social security there. You can play with credit, you can use your American Express card and bitcoin. There's still a lot of friction right now, but on the other hand, you have a lot of opportunity.

BW: Friction is pretty much what killed the attempts to do meaningful online poker. I don't think it would be that much of a friction problem; I think people would learn. The payment processing friction pretty much got ironed out by New Jersey's early years.

MB: Where there's a will, there's a way. If I really want to do this, I'm going to get the four digits of my social security and not think of the risks. To get my bet on, I'll go get a pre-paid credit card. There really is still a lot of friction. I would like to say there isn't, but there is.

WH: The conversion rate from DFS to regular sports betting is very high.

MB: Paddy Power Betfair did a study on their player base and it came back 80% of their DFS players bet on sports.

WH: They're ready for it.

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COMPETING IN THE UK MARKET

Panellists at iGB Live discuss the intricacies of the UK affiliate sector and how to remain competitive in such a saturated marketplace

CONTRIBUTORS

MODERATOR:

Martin Calvert, Marketing Director, Blueclaw

SPEAKERS:

Eyal Moskovitz, Performance Marketing Director, Ladbrokes Coral

Nadine Killoran, Marketing Director, Oddschecker

Gavin Walters, Director of Business Development, Gambling.com Group

THE IMPORTANCE OF THE MARKET

MC: With operators now in so many jurisdictions, how important is the UK market for you?

GW: As a business, the UK represents roughly around 70% of Gambling.com's operations at the moment. It has always been a focus and it probably always will be as long as it is this high in revenue. Our head office is in Dublin. We have more than 100 staff there. Most of our staff are all working towards the UK market right now, so that shows you how big a deal it is to us.

MC: But are there some challenges? It's a packed market, and there's also regulatory concerns that make doing business in the UK not always the easiest with the clearest opportunities. Is that something making you broaden out to other markets, or are the rewards of the UK market enough to allow you to really commit to the sector?

GW: That's not putting us off, to be honest. Actually, as a problem, we would rather it be almost black and white. Do this, do that and then you're okay.

MC: What are the challenges for Ladbrokes Coral, compared to a smaller operator or a super affiliate?

EM: I don't know what the difference is with a small operator. I think the challenge for us is when it comes to affiliates. I think the biggest problem is trouble from some of the affiliates. Smaller affiliates try to increase their margin by doing things which are against regulations. That's the biggest concern we have right now. How do you control everything they do?

MC: So operators are open to some risks by working with affiliates? What do you look for in affiliates?

EM: First and foremost, transparency. Be transparent; both sides with each other. Affiliates who are actually transparent about how they work, how they will deliver traffic, what type of company they are, whether they stand by regulation, rather than being a bit tricky, or a bit misleading. We have a limited list of affiliates. A couple of years ago, we reduced the amount of affiliates by 97%. We shut down 97% of affiliate accounts and kept only 3% because of exactly this; because of our lack of ability to control what's going on and a lack of ability to know where our ads are being displayed.

We would prefer to lose the traffic, lose the revenue and protect the brand: even if it's a large-scale affiliate. We had issues with bigger affiliates and we've had to shut them down. The relationship was there, but because of a different point of view, we have had to cut it.

THE VALUE OF TRAFFIC

MC: When we're talking about affiliates targeting the UK market, what can they be doing in practical terms to be more sophisticated and get more out of high-value traffic, while getting results for themselves?

GW: Do one thing. If you've got two or three people on your books, I think you'll struggle to really do something well if you're going to try to do more than one. I'd just target it real niche and be awesome at it. I think that's the only way you will beat the bigger guys.

MC: Is that down to focusing on sportsbook, casino or platforms?

GW: It could be a form of betting within sports betting. I've known affiliates in the past that had one slot site about one particular slot and informed me they were making more than £10,000 (\$12,120) a month, just from one slot. It was a few years ago, but there's one example of how something quite small in the industry can make a decent living for somebody, if you're just working on a small scale.

NK: Mobile is the future. We've definitely transformed our business from a predominantly horseracing business to now looking from more of a mobile perspective, where we get much more betting activity and behaviour. Small affiliates should look at mobile apps. Look at native-first, mobile-first, responsive websites. It's got to be tech-first, because consumers are on mobiles, not on desktop.

"SMALLER AFFILIATES TRY TO INCREASE THEIR MARGIN BY DOING THINGS WHICH ARE AGAINST REGULATIONS. THAT'S THE BIGGEST CONCERN WE HAVE RIGHT NOW"
- EYAL MOSKOVITZ

MC: Do you see a difference in the quality and value of traffic from people who are trying to serve everybody all at once, or affiliates that are focusing on one type of niche, or one type of offer?

EM: Not an offer, but definitely a niche, yes. We can segment by the traffic source and I can definitely say there are niches that are valuable.

AFFILIATE-OPERATOR RELATIONSHIPS

MC: When it comes to what affiliates can be doing to work more collaboratively, what type of marketing initiatives are you welcoming? What type of partnerships are you trying to form with operators?

EM: We will work directly with affiliates. We have affiliate managers in-house. Obviously, it's a matter of how we co-operate with them and how much we co-operate with them; it's a matter of scale and size. Smaller affiliates get a little bit less attention. It depends on the size really.

NK: We invest a lot of time speaking to affiliates day in, day out. It's not just a transactional relationship anymore, it's much more about the long term and maybe an operator wants to focus more on brand for example, more than offers; so you've got to tailor for the operator. You've got to make sure you're packaging for the operator what they want and what they need. We do a lot of work on brand, because you can get a lot of eyeballs on the Oddschecker website with visitors.

MC: When it comes to the UK market, one of the topics we've been challenged to discuss is about the public image in the UK. Is there something you're looking for specifically here?

GW: We've hired people for communications PR. As well as promoting Gambling.com and the general business, we're actually promoting the industry as a whole. It's a very big strategy of ours.

EM: A definite yes. There are lots of things they can do, from not being misleading on their ads, to not



we as an operator should incentivise the affiliate for this kind of activity.

MC: I guess that would be the same for other operators as well who've already got such a large presence. They've already got the app installed, they've already got a user base signed up, but they're still looking to somehow reward that traffic generated. Do you see that model coming soon for affiliates?

GW: I don't see it coming soon, no. It's been spoken about for years now and no one's ever made the move to do it. It's on the operators' side and they need to put that in place. We internally are heavy on data, but we've had to use what we've got and then do it ourselves within the company. We obviously don't get the operator data. We're heavily optimised to the last click at the moment because that's what pays the money and that's the deal on the table right now. But yeah, if the attribution model comes into play, I'm sure we could do a lot more. If operators want more, that would be the way to do it.

MC: Surely it can only really happen if there is that close operation between the operator and affiliates. It may not be soon, but I guess it's something that needs to be prepared somewhat to start building up these relationships earlier.

What pieces of advice would you give to a UK-focused affiliate that may have hit what they feel is a ceiling in their traffic? What can they specifically do to help jump-start growth? How can they reposition things? What should they be doing to bring value to their operators?

GW: I'd say assess the website. There are probably some things you need to change in there, or tweak just to push it to the next level or give it a fresh appeal. There will always be something, so analyse everything you've got, then try and work back and refresh something. Secondly, I would say hire younger staff. I just think once you get to a certain point, you can't buy that younger experience coming in with fresh ideas. They see things you won't. Then I guess be open to new markets and emerging markets. If you've hit the ceiling where you are, you probably just need to go somewhere else and replicate what you've done.

NK: I agree with that. I think the younger staff bit might rule me out! But I think the key thing is being open to diversifying markets. Look at mobile apps and SEO. SEO is something we've really focused on, but you just have to constantly keep up to date with our friends at Google, what they're doing and the changes they're making. Then I think it's about understanding the operator's need more. It's more than just acquisition now; it's about diversifying your standing.

MC: Eyal, is it value over volume again?

EM: I would say a few things; one is work on your relationship with the operator and your clients. Make sure they trust you, make sure they value what you do for them and then they will give you more budget. Increase your diversity of markets now the US market is open. It's still quite easy to get in as an affiliate now. Innovation, mobile apps: think outside the box a bit; outside the plastic affiliate box.

advertising on underage content. Not to get too aggressive with the offers, with the imagery, with the message. Not to attract too much fire, because a small banner in the wrong place can really find itself on the front page the day after.

It could easily be done if one affiliate publishes something they think is funny, but for us it's a problem. It can attract hundreds of players, but we get a Daily Mail article the day after. Think how you can protect the operator and if you feel what you are doing does not protect the operator, just don't do it.

REWARDING AFFILIATES

MC: Do you think the UK market will ever move on from last click for rewarding affiliates?

EM: I think so, definitely. Ours is a pretty large brand in the UK. About 50% of the players we acquire from last click already have an account with us. It's becoming less and less effective to try and acquire new depositing players in the UK just because we have such a big player base.

We are now looking for other ways to evaluate traffic. Obviously there is a big retention piece, especially for websites like Oddschecker, with people coming to check their odds and click our banner even if they're already a player with us. There is a whole retention piece we need to measure and reactivation is another one. Even if you acquired a player for us already in our database, but they have been inactive for the last two years, I think

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ONE YEAR ON: HOW GDPR IS STILL IMPACTING AFFILIATES

Tal Itzhak Ron, Managing Partner at law firm Tal Ron, Drihem & Co., discusses how GDPR has changed the affiliate market and what can be done to comply with newer regulations

In the past year, a number of compliance and banking challenges have been affecting the digital marketing world. The main issues affiliates and operators have been facing relate to: the effect of data protection laws on their business strategy; new banking and payment requirements, including those recently introduced by MasterCard; and non-voluntary payment requests and debt collection.

If there was some uncertainty over the effect of data protection laws one year ago, this year has clearly established their significant presence. Since 25 May 2018, when the new GDPR law was introduced, we have seen more than 65,000 data breach notifications in Europe, \$63m charged in fines by European regulators, and more than 500,000 data protection officers are now registered. It is important to remember GDPR

applies to all businesses that deal with the personal data of any European citizen, regardless of where the business is geographically located.

THE IMPACT ON AFFILIATES AND OPERATORS

With opt-in becoming a mandatory requirement, affiliates and operators must, among other things, establish whether or not the current level of opt-in permission they use meets GDPR requirements. According to GDPR's article 4(11), opt-in consents require "a statement or a clear affirmative action." Recital 25 further explains this affirmative action cannot be obtained by silence, pre-ticked boxes or the data subject's inactivity. The goal is that the data subject must always provide a conscious choice and a proactive affirmation.

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TAL ITZHAK RON

Most of the discussions relating to the effect of data protection laws on affiliates and operators focus on consent, email marketing and other relevant channels, such as social media. GDPR specifically requires an explicit consent, separate from the terms and conditions.

Under GDPR, "implied consent" or "soft opt-in" methods will no longer be an option to gather B2C personal data. To this extent, companies must be able to provide signed proof that each data subject actually elected to opt-in and wasn't added to the company's list by default, inactivity or automation. Companies are advised to sign data processing agreements with each third party they work with, to limit their liability.

Note that according to the GDPR's "right to be forgotten," each data subject should also be informed about the right to opt-out at any time. To fulfill this right, you should check your company's technical integrations and ensure personal data can be removed immediately from all relevant databases and platforms pursuant to the data subject's request.

"OUR ADVICE IS YOU SHOULD ALWAYS BE AS TRANSPARENT AS POSSIBLE WITH CONSUMER DATA TO BUILD RELEVANT, VALUED RELATIONSHIPS WITH YOUR CUSTOMERS"

Even though such requirements could lead to a significant drop in European users, digital marketers cannot afford to ignore GDPR, especially with fines of up to €20m, or 4% of the company's total worldwide annual turnover - whichever is higher.

Our advice is you should always be as transparent as possible with consumer data to build relevant, valued relationships with your customers. Marketing should not be aggressive or mysterious. If a user understands why they're opting into your services and perceive the value they will gain, you will have a trustful relationship, a better audience and higher conversion rates. Therefore, with a more receptive audience, the benefits could actually outweigh any negatives relating to data protection laws.

Needless to say, data protection laws are not going anywhere, and we are seeing an increased trend in the adoption of data protection laws around the world, notably California's data privacy law The California Consumer Privacy Act (CCPA), which is set to come into effect at the start of 2020.

Once you have obtained a compliant marketing strategy, the second point to consider is: how does your venture currently deal with banking and payment requirements?

Recently, there have been more and more cases where banks and payment institutions have refused to accept money from affiliates and brokers. This has generally been the case where affiliates and brokers conduct high-risk businesses.

WHAT ARE "HIGH-RISK" BUSINESSES?

On 12 April 2018, MasterCard created new compliance requirements affecting: Financial institutions; businesses that disburse their own funds to their consumers or small business customers; licensed money transmitters; and organisations which are not required to register as a licensed money transmitter but have provided a legal opinion which has been reviewed and approved by MasterCard's legal counsel.

MasterCard specifically added merchants involved in the following activities to its Business Risk Assessment and Mitigation (BRAM) program: Binary options trading, contracts for difference (CFD), foreign exchange (FX) currency options trading, crypto-currency options trading and initial coin offerings (ICOs). Therefore, brokers and affiliates dealing with digital marketing for financial services and crypto industries should be extremely careful to comply with such requirements.

This means that today, all merchants involved in the above-mentioned "high risk" activities, can no longer submit transactions via the MasterCard network without being legally authorised to do so in the jurisdictions where the cardholder resides. To demonstrate such compliance, MasterCard requires all merchants to register with the MasterCard Registration Program (MRP) and demonstrate compliance with the newly-introduced requirements. Failure to do so will lead to possible fines raised as a result of BRAM violations.

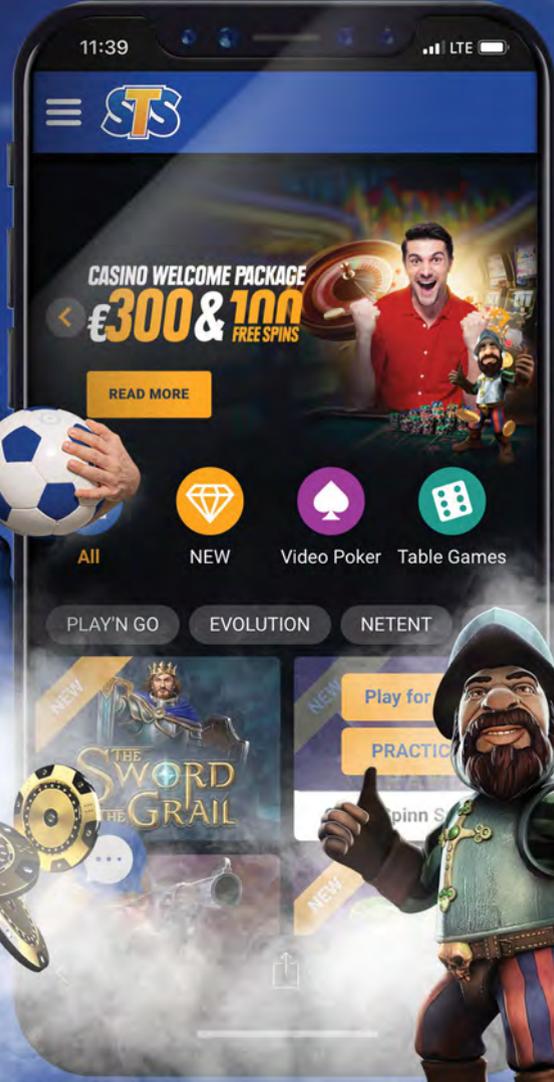
Complying with MasterCard requires each merchant to provide: "(a) Evidence that you are legally authorised to perform the above listed activities, including a copy of the merchant's licence (b) a reasoned legal opinion, and (c) a certification of effective controls."

To continue transacting with MasterCard and other payment institutions smoothly, and adhere to all of their new requirements, you are highly encouraged to obtain legal advice as quickly as possible to adopt the required compliance procedures.

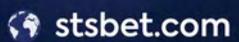
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Affiliates



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CREATING CONTENT IN THE US

Tom Galanis, Managing Director of First Look Games, discusses the role affiliates will play in the US online gambling sector and suggests it might be better for operators to create their own content



The US online gambling industry is undoubtedly the most exciting at present. More and more states are passing legislation to permit legal sports betting for the first time, and in some cases, these bills are also opening the door to online casino and poker.

The excitement is understandable – the US has the potential to become the largest regulated online betting market in the world. All stakeholders, be it operators, suppliers, affiliates and media giants, want to put themselves in the driving seat to capitalise.

Success will depend on a huge number of factors, but in such a competitive space, the way in which online gambling brands engage, educate and entertain consumers will be key. Brand equity has to be built, trust fostered and rivals overcome, all within a highly-regulated space.

If we look to more established markets such as the UK and the recently re-regulated Swedish market, online gambling operators have historically relied on affiliates to help achieve brand awareness and drive new player sign-ups.

While the relationship between operators and publishers has come under scrutiny of late, with some even questioning

the long-term viability of these partnerships, affiliates and gambling brands continue to work hand in hand; for now at least.

But what role will affiliates play in the fledgling US market? We have already seen some of the sector's largest publishers enter the fray via a string of big-ticket acquisitions and buy-outs. I'm talking about the likes of Catena Media and XLMedia.

The question, of course, is whether online gambling affiliates will be as effective in the US market and whether, given the super-stringent regulations and state-by-state nature of the market, they can be a cost-effective way for operators to acquire new players.

In New Jersey, for example, affiliates have to apply for vendor registration or an ancillary casino services industry enterprises permit. They are then required to only work with and promote online gambling operators that are licensed in the state.

This model would then have to be replicated in each state they wanted to enter. For the affiliates themselves, this may prove to be unviable, given the cost of being able to target and acquire players from New Jersey and the limited pool of players to engage.

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What this means is online gambling operators may only have a handful of affiliates to work with in each state and the cost of running their affiliate programs may outweigh any benefits they bring in. Staff, compliance, office space, revenues paid to affiliates and so on all have to be considered.

What is the solution? How can online gambling operators in regulated US states target players within their borders and drive new player sign-ups without having to rely on affiliates? Simple; they will have to create content in the same way affiliates do.

Let me explain. If you look at how most affiliates engage with potential players, it is predominantly done through the content they create. I'm talking about reviews, guides, explainer articles and even interviews with casino managers and game developers.

This content serves several purposes. First, it provides players with the information they need to learn more about online gambling and where to play. Second, it is a powerful SEO tool that can help operators rank for the specific keywords and phrases consumers are searching in Google.

Regarding the latter, Google is putting more emphasis behind content and user experience when it comes to determining where sites rank. By creating a vast library of content and hosting it under a dedicated tab on their homepage, online gambling operators can leverage the power of content.

But how do operators create content hubs and what sort of content works best? The first step is to undertake an audit to gain a clear idea of your target audience, the type of content they like to engage with and how they like to interact with it.

An online sportsbook operator in New Jersey for example, may want to target sports fans located in the state. During their audit, they may learn these people like to read about the New Jersey Devils, in particular match reports, and that they access this content via mobile.

An online casino operator, on the other hand, may learn players are searching for information on whether online casino is legal in New Jersey, and are reading long-form guides that provide everything they need to know about licensing and regulation which they read on their laptops.

Armed with this information, online gambling operators and their marketing teams can get to work on a content plan. This is a blueprint for the content that needs to be created; topics, formats, when and where it will be published and shared etc.

When putting a content plan together, it is important to consider two things: what your potential readers want to read and the topics you need to be writing about to help search engine results page rankings.

Getting this right is no easy task. In the past, content marketers would plug content with key words and phrases, impacting readability and the user experience. But with Google now prioritising UX, content must be written to be read first and foremost.

Your content plan should also include the different types of content you create and publish, and while the written word will be the foundation of your content hub, also think about audio (radio broadcasts, podcasts etc.) and video (player interviews, for example).

Content hubs undoubtedly require investment – both in time and money – but remember operators would have to incur the expense of establishing and running an affiliate program, and then paying affiliates for the players they send, potentially over their lifetime.

By creating and publishing their own content, operators can reap the benefits – engage and entertain players directly, drive conversions and unlock tremendous SEO value – without having to incur the additional expense of compensating affiliates.

But the upsides go beyond just financial and SEO benefits. By creating content hubs, online gambling operators are able to add significant value to the player experience. They can also take trust and loyalty to the next level, building genuine and long-standing relationships with consumers.

It is a tactic that is being used by the sports media giants that are planning their attacks on the regulated online sports betting market. These brands have used content to build massive audiences of sports fans and potential bettors that are trusting and loyal.

"BY CREATING AND PUBLISHING THEIR OWN CONTENT, OPERATORS CAN REAP THE BENEFITS – ENGAGE AND ENTERTAIN PLAYERS DIRECTLY, DRIVE CONVERSIONS AND UNLOCK TREMENDOUS SEO VALUE – WITHOUT HAVING TO INCUR THE ADDITIONAL EXPENSE OF COMPENSATING AFFILIATES"

As more states open their doors to legal sports betting and these media brands flick the switch on their online and mobile sportsbooks, they will be able to easily and quickly convert readers into bettors. If you think about it, why would these readers bet anywhere else?

That's not to say the game is already over for gambling brands, but they must react quickly and begin building their own content hubs now. This is not just to compete with their media giant rivals, but also to negate the challenges the traditional operator/affiliate relationship faces.

Those that do will not only be able to acquire new players at scale, but they will be able to retain them for many years to come. Of course, this will be achieved in the most cost-effective – and regulatory compliant – way possible.

ORGANIC GROWTH IN ESPORTS AFFILIATION

Matthew Enderby spoke with SickOdds Founders **Nick Pateman** and **Tom Wade** on the development of esports betting and affiliation



NICK PATEMAN

How has your year been so far? What challenges have you faced?

NP: Our business model is very much organic traffic, so we don't do any paid advertisements or anything like that. This is largely to keep our margins quite big, but also to create more of an asset that holds value in the actual business itself through organic rankings.

The challenge is the top three esports - Counter Strike Go (CS:GO), League of Legends and Dota - are getting enormous amounts of betting. That's where 90% of all esports betting is happening. From an organic point of view, they are extremely competitive. Our challenge has been: how do we work with that?

While we do go after those esports ourselves, we find ourselves having to expand to much longer terms and smaller esports that are coming out of the woodwork and could hold potential in the future. Our challenge at

the moment is choosing those smaller esports that might have a fast growth versus the effort we put into going after the established ones. That's probably our largest challenge at this stage.

What unique opportunities are presented in the esports space?

NP: There are some sportsbooks that take a very unique angle and really go after the gamers that are betting on these sports. We don't have the exact figures, but the research we have done shows a huge number of those who bet on esports are actually gamers. A lot of sportsbooks have tried to adapt their style to suit gamers in a way that traditional sportsbooks don't do. There's a couple out there that provide character customisation within the sportsbook app itself and allow you to collect items as you bet. These items allow players to get better odds or collect bonuses and cashback.

TW: There are also some quite interesting things going on with one of the sportsbooks - Unikrn. It's operating Unikoin Gold, its own variation of the crypto-currency you can earn while playing games. It promotes you playing games and then you can use that earned currency to get rewards or move to the betting platform.

Are there issues with match-fixing in esports?

TW: Match-fixing in esports has been just as much of an issue as in traditional sports. There have been recent regulations and advancements in the past two years. Although there have been smaller authorities, a lot of the responsibility has generally fallen with the game publisher or the tournament organiser, who aren't necessarily well-versed in dealing with this.

There is a fantastic initiative called ESIC, the Esports Integrity Commission, which focuses on preventing match-fixing, but also providing advice and information for tournament organisers on how to deal with it once it's happened. ESIC is extremely experienced in traditional sports and it also works with betting companies to notice early signs of when things are looking a little bit dodgy or people are putting large amounts of bets on the underdogs.

NP: Another potential issue is the age of the players. Some of them are so young you can imagine it would be much easier to convince them to fix a match. Also, careers in

esports aren't necessarily proving to be that long term at the moment. Obviously there are players that have gone on forever, but if there's a short-term gain to be made, in a market that is very volatile – you can see the appeal.

Affiliates often see increases in traffic at the time of major events like the Fifa World Cup. Are there any similar trends in esports affiliation?

TW: Our biggest example of that was the Fortnite World Cup. In terms of markets covered and the data available, it was very limited in the number of sportsbooks that we could push the user towards. But what we did see during the World Cup was a spike in traffic. Our Google analytics basically set on fire. We had someone going to a sportsbook for the entire duration of the tournament.

We often hear about the potential behind betting on esports. How long do you think it will be until we see this fulfilled?

NP: It's always tricky to put a timeframe on this. I thought virtual reality for example, was going to explode years ago, but that's only going through its next hype cycle in the next couple of years. I think esports is facing something similar, where there was a lot of money going into the industry, as people saw this wasn't going away.

Now it's just about timing, which is a very tricky thing to get right in any market. What is hard for us to say is: where is the end point? What's the line in the sand that says the market is now established and stable?

TW: In my mind, I would say it will be three to five years before it gets to the point where it's there. You do see a lot of esports events of a large scale and every major team has a betting sponsor or a main sponsor that is a betting company. But realistically, I think it will probably be three to five years until it starts really cementing itself.

What do operators still need to do to better understand betting on esports?

TW: Esports fans actually do like sports. Just because someone plays Fifa, it doesn't mean they've never left their parents' house. Just because you play Call of Duty, it does not mean you don't know how to talk to people.

It's a very big thing for operators to understand; they can like esports and traditional sports, and they can transition across. If people are massive fans of Chelsea and Chelsea partnered with a Call of Duty team, there's probably a transition of loyalty through that and I think there is going to be a lot of brands in a big position to cash in on that.

But the other side is that esports fans don't want companies to abuse their industry. It's taken gamers a long time to get to the point where we're socially and culturally recognised. I know when I was in high school and college we would play games but not tell anyone. They don't want brands to come in and steal it without understanding it.

NP: It's difficult for the sportsbooks themselves, as a lot of traditional sports fans are not necessarily open to esports and certainly have preconceptions and misconceptions about esports. To see their favourite sportsbook suddenly advertise esports, they might question the brand they are associating with. The brands themselves are fighting a tug of war at this stage. I don't think there's enough acceptance of esports for it to be a big part of a sportsbook like



TOM WADE

**"ESPORTS FANS ACTUALLY DO LIKE SPORTS. JUST BECAUSE SOMEONE PLAYS FIFA, IT DOESN'T MEAN THEY'VE NEVER LEFT THEIR PARENTS' HOUSE"
– TOM WADE**

Bet365. I imagine that concerns some of its existing player base.

What specific targets do you need to hit to make the year a success?

NP: By the end of the year, our main goal is to re-launch the site with an odds-first engine that Tom has put together in the last few months. We also want to partner with other data companies and expand on the user experience we currently offer. The organic traffic will follow from there.

TW: One of the goals we set out from day zero was avoiding being an affiliate site that just spammed Google to get clicks. As Nick and I were always so passionate about gaming and esports, we wanted to create something that would actually benefit the gaming community. We wanted to be a resource that people would type into the URL bar and not just click from a result in Google.

UK REGULATION: INDUSTRY IS TO BLAME

Dina Niron, Founder and CEO of Sparks Advisory, believes warning signs ahead of tougher affiliate regulation in the UK have been ignored



The latest free-to-play age verification requirements from the Gambling Commission, which were implemented earlier this year, have left many affiliates floundering. However, I would claim the writing was on the wall.

Free-to-play was a very useful tool for most affiliates to attract players at a relatively low cost (about £3) and refer them to online gambling operators. From a regulatory standpoint, very little was required, making this a highly-profitable mechanism, with hefty margins.

Two years ago, when I attended iGB Live in Amsterdam, I vividly recall trying to warn various affiliates of the upcoming risks of continuing their aggressive marketing. All parties involved with player acquisition channels were optimising revenue with little regard to regulatory requirements.

They were bouncing responsibilities between themselves and operators, assuming they would avoid regulatory action and fines. Back then, I warned against such an assumption, pointing out the Gambling Commission had called for better compliance, marketing restrictions and initiated investigations.

However, as always, when a substantial amount of money is at stake, affiliates and operators as one continued pushing the limits. Soon after, a record £7.8m penalty against 888 Holdings was imposed in August 2018. The following November, Casumo

was hit with a £5.85m fine as a result of serious deficiencies identified by the Commission's investigation, while Videoslots agreed a £1m settlement for its failings.

As a result of these regulatory actions, some operators, like LeoVegas spun out their entire compliance division. Others, like 888 and Sky Bet, decided instead to completely dispose of their entire affiliate programs. But still, no real change occurred and the gambling industry continued to do its best to avoid implementing required regulatory checks and limitations.

Further investigations were initiated by the Gambling Commission, and more operators and affiliates were interrogated with regard to underage players among other issues. Additional fines were issued and many more millions of pounds were paid. But that was just the beginning.

In a vicious cycle, aggressive marketing targeting younger audiences created a toxic environment for gambling in the UK, causing very bad publicity and calls for a complete marketing ban and severe gambling restrictions. Tighter AML requirements were issued, along with regulatory inquiries on social gaming, loot boxes and free-to-play games. This resulted in additional regulations and further fines, causing much higher CPA and falling margins.

In a reminder published in May this year, the Gambling Commission said it "has been made aware that licensees may be benefiting from affiliate advertising models, which offer free-to-play versions of real money games on their websites without the necessary accompanying age verification of users."

But that wasn't enough. Reports by the charity GambleAware have continued to demonstrate younger audience participation in social and free-to-play games, which can lead to underage participation in illegal gambling. Therefore, the Gambling Commission has raised the bar again.

In a harsh move aiming to protect children and the vulnerable from gambling, the Gambling Commission has materially expanded the rules, applying yet additional very strict regulations and implementing age verification requirements specifically demanding operators verify the players age. This would be prior to making any deposits of funds into an account, and before they gamble with the licensee with either their own money or a bonus.

The Advertising Standards Authority (ASA) decided to censure gambling and gaming companies alike over marketing campaigns targeting children, and censured Tombola over an app advertisement that had "some appeal" to under-18s.

The painful implementation of those new regulations shall no doubt further drive the UK gambling industry down to lower revenue and margins until a new loophole shall be found and exploited.

INTERWETTEN CEO: AFFILIATE-OPERATOR RELATIONSHIPS NEED TO WORK BOTH WAYS

Dominik Beier, Interwetten CEO, speaks with **Matthew Enderby** about how affiliates can improve their partnerships with operators by thinking about long-term gain



What challenges have you faced so far this year?

There is a lot of uncertainty in our main market at the moment - Germany. There is a new sports betting licensing procedure coming up that might not actually happen; you never know in Germany. There is this huge uncertainty which I think we share with all of our competitors that are also strong in the market, such as Bwin or Tipico.

If they do implement this new regulation they are currently planning for 1 January, everyone will lose 70% to 80% of their business in the market. This would make it almost impossible to do marketing there anymore.

Affiliate-operator relationships are often described as strained. How do you see them?

I totally agree. It was like the Wild West until the consolidation of the affiliate industry started. Honestly, I think affiliates have to reinvent themselves; it's not as easy as before. You can't just use a Google-optimised page and start sending traffic to an operator. I think they need to find new channels, new ways.

They are an important part of the industry; I don't want to neglect them. But if you look at the costs involved with affiliation and look at the whole industry, the affiliates and suppliers are the ones who are growing the most.

Unfortunately, we've had to cancel with a lot of corporations, because they are not economical for us.

That's why affiliates have to reinvent themselves and think about quality and how they can deliver revenue to an operator; not how they can make the most in the short term. That will just end with a lot of operators shifting away from affiliation, which is already happening.

They would rather pay more for regular media than pay revenue share, as it will save them money in the long run. There's a lot of pressure from the affiliates to reinvent their business model and quality.

How can the situation be improved?

The reason why I think affiliates need to change is the operator takes all the risk. The operator takes all the risk of regulation, lawsuits, winnings and losses.

I know the gross margins of affiliate companies are huge compared to operators and I think this is a balance which is not fair at the moment, especially as affiliate prices are increasing. There is a point, which has been hit, where the operator will turn back and say no. That's why there has to be a change in the mindset of the affiliate. They can't just take all the money from operators. The relationship has to work both ways.

What plans do you have for the Lisbon Affiliate Conference?

Our affiliate team will be there. As with any of these events, whether it's G2E, ICE or anything else, it's always good to bundle together and have all the meetings with affiliate partners and everyone else. It's always very important to Interwetten. We are one of the oldest online operators and we always seek to have long-term relationships with all our partners. The personal connection is still very valuable to us.

Are there any new markets you are keen to enter?

We got a license in Sweden. The market is still a bit rough in Sweden, as you can see in the numbers, but we are making the best out of that.

We are going to launch in another market in Q4, which I cannot tell you about yet. We'll take it one step after another, try to make the best out of what we have at the moment and continue to look at new opportunities.

What specific targets do you need to hit to make the year a success?

There are many different factors here. Our financial target is obviously one of them; we are planning to reach €100m GGR for 2019. That's our big goal. It looks like we will be able to achieve it.

Generally, we have to face some regulatory issues. We want to make the best out of that, especially in Germany. We also have a lot of internal transformation going on. We need to get younger, work hard and get better in all of our sectors. If you work hard, the success will come.



BRINGING AI AND AFFILIATES TOGETHER

The **1xBet** Affiliates team lists how artificial intelligence marketing can be exploited in the gaming affiliate space

In any business, a company has to adapt or die. Nowhere is this adage more true than in the fluid and fast-moving world of affiliate marketing. As technology grows at a breakneck pace, there is a need to not only keep up, but to innovate. In many ways, the best way to do this is to embrace the very technology which is fuelling the change and utilise it to our advantage.

Artificial intelligence (AI) marketing is emerging as the premier way to navigate the new digital landscape that has become a virtual home to the majority of the world's population.

What exactly is it, you may ask? Well, it's not AI in the traditionally defined way – it won't pass a Turing test or launch Skynet, but it's a very effective way to formulate targeted messages to consumers. By leveraging customer data and AI concepts like machine learning, this technology can exponentially boost profits.

With more than two billion active social media users and even more casual browsers, the reach of affiliate marketing has never been greater or more cost-effective. AI technology has a variety of advantages which enable affiliates to personalise approaches.

The sheer processing power required to collate all customer interactions wasn't around a decade ago and neither was the knowledge of how to fully use it. Affiliate marketers are now able to analyse large blocks of data with little to no manual work. This is done by machine learning, which can identify current trends and predict future ones. It's able to see the wood from the trees and use this snapshot to help formulate solutions.

But exactly how could this type of technology benefit the average affiliate? Well, let's outline the specific AI tech methods our affiliates could implement:

Swift data analysis: The effectiveness of promoting a product directly correlates to the quality of the data analysis. Too much information that never gets sorted slows down the advertising process. This is where AI tech shines – it's able to quickly sift through cluttered, disorganised data and identify trends.

Chatbots: Another piece of AI tech that's getting better by the year are chatbots. For affiliate websites, they are able to not only interact with visitors, but also gather valuable data and even send promotional information.

Machine learning for a better mobile experience:

Today, most online traffic comes from mobile devices. AI can be implemented to collect and analyse user data which helps in the creation of campaigns that enhance the mobile experience.

Customised content: Creating content of value to users is no mean feat and is an essential part of any affiliate website. But the importance of it is far too often overlooked. AI tech makes the whole process a lot easier, providing valuable tips on emerging trends and customer interest. AI can even compare SEO texts from other platforms and suggest new topics. This can be invaluable when creating an abundance of targeted articles.

Results analysis: Through deep-learning algorithms, the success level of all previous campaigns can be identified. This can help affiliates know where to dedicate valuable resources in the future. Spending time on what garners the best results will maximise profits.

It's the dawn of a new age and these are just a few of the tools available to affiliates which can assist in propelling their businesses forward. Technology is speeding along so quickly that even in just one year's time, this article may appear antiquated. The bottom line is that brands and affiliates that don't move with the times will be left behind. The AI technology available not only warrants consideration, but needs examination. It's time to find out which tools suit you and to improve your business by embracing the future.



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PLAY HARD

Betsson Group's Affiliate Operations Manager **Shakyra Jonsson** talks to **Nathan Joyes** about her passion for football, the hit song "Waka Waka" and who she couldn't spend a week with

YOU EXPRESS YOUR PASSION FOR FOOTBALL ON YOUR LINKEDIN PAGE. WHO DO YOU SUPPORT?

My grandfather was a footballer. He actually played for Malta and this is where my passion came from. My family were very much into the sport and so all I watched from a young age was football.

My father also was a player and a coach – but my grandfather supported Manchester United and my father supported Chelsea. I chose to support Chelsea because I watched most games with him.

I'm going to watch Chelsea vs. Manchester United in February, so I am very excited for that. I actually got a tattoo of Chelsea FC on my wrist when I was 18. You can imagine what my mother said when she saw it.

IF YOU WEREN'T WORKING IN THE GAMING INDUSTRY, WHAT WOULD YOU BE DOING?

I reckon I would have ended up working in a branding agency – maybe I would have opened my own. That's what I was doing before I moved into the gaming industry. It was a risk for me to move into this industry, as it was completely new, but one which has proven to be worth it.

YOU MAY HAVE REALISED YOU SHARE THE NAME WITH A CERTAIN POPSTAR. ARE YOU A FAN? IF NOT, WHAT MUSIC ARE YOU INTO?

I hated my name with a passion when I was younger, because no one could pronounce it. My mother chose to use a y instead of an i, which completely threw people. Nowadays, people can't go wrong, because it's more popular.

I'm not a super fan of Shakira, but then again, she is married to a footballer, so why not? I'll admit I am a fan of her song "Waka Waka" though.

I am a fan of the Backstreet Boys and I still listen to Elton John, who is my favourite UK artist. I also like most Italian music as well.

IMAGINE NOT ONLY ENTERING BUT WINNING THE LOTTERY. WHAT ARE THE FIRST THREE THINGS YOU DO?

The first one - I would move away from Malta, where we are based, and buy a super lavish villa far away from everybody. The island has become so dusty and noisy. Perhaps I'd buy a new car; definitely an upgrade from what I have anyway. I'd then buy my family a holiday, wherever they wanted to go. I'd also donate to charity. I know that's four, but it would be for a good cause.

WHO COULDN'T YOU SPEND A WEEK WITH ON A DESERTED ISLAND?

If it was for seven days, 24/7, I'd have to say my mother. We would fight like cats and dogs! We get on so well, but if we disagree on something, we will fight forever. She always has to get her own way, but I still love her to bits.

SPEAKING OF DESTINATIONS, WHERE IS THE ONE PLACE IN THE WORLD YOU THINK SHOULD BE ON EVERYONE'S BUCKET LIST?

I'd have to say the Caribbean or the Philippines. People tend not to go to these destinations, because they cost a lot, but if money wasn't an issue, these places would definitely be high on the list.

DO YOU HAVE ANY HIDDEN TALENTS?

Nobody really knows, but I can play the piano. I used to play it a lot when I was younger, but as I got older, I had to make sacrifices and unfortunately this was one of them. ◀





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