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MAY 2022



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INSIDE:

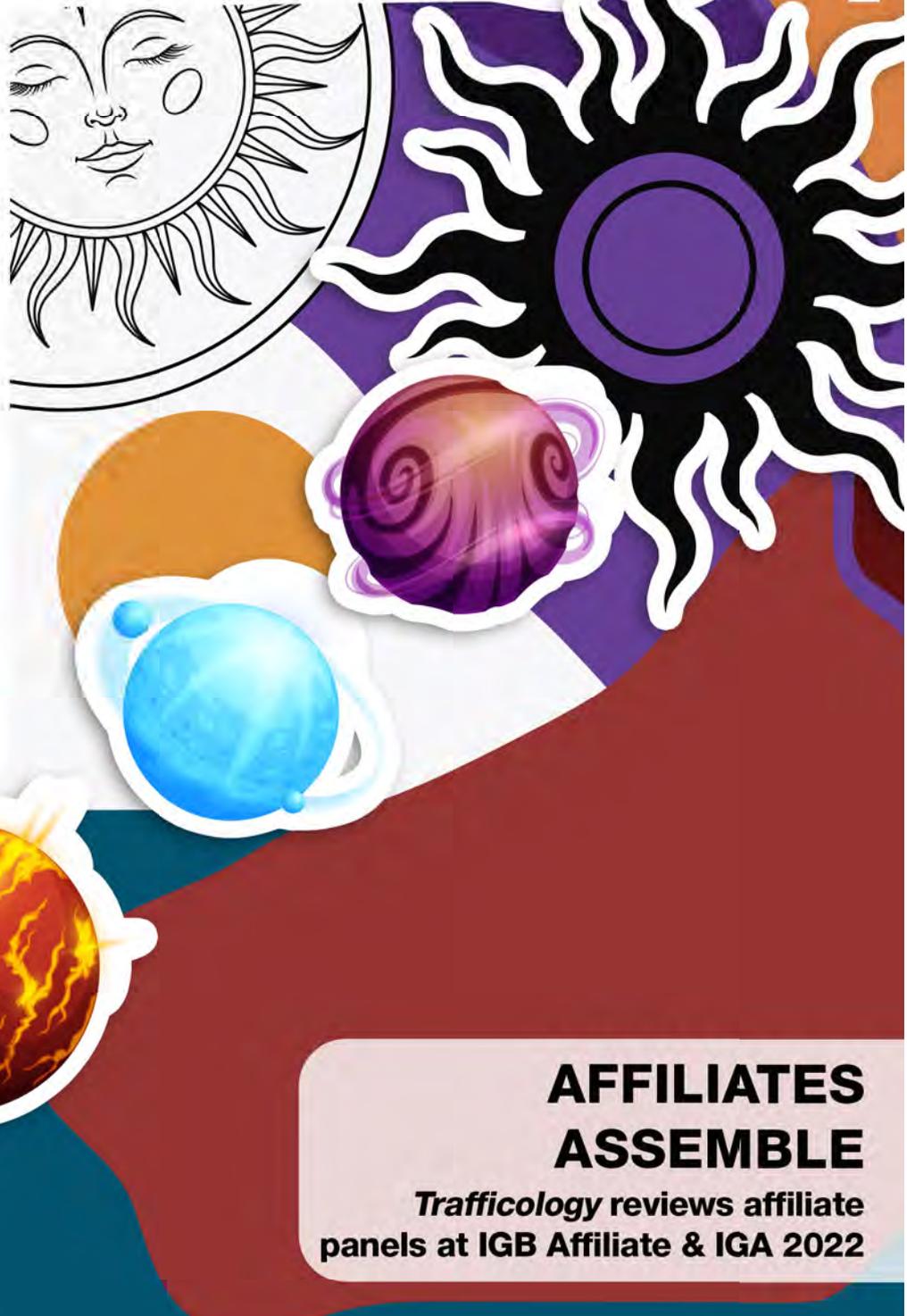
**German regulations:
Dr Joerg Hofmann**

**IGB London:
Betting Hero**

**IGA: Crypto and
product security**

**Play Hard:
Vinnie Jones**

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**AFFILIATES
ASSEMBLE**
Trafficology reviews affiliate
panels at IGB Affiliate & IGA 2022

TRAFFIC REPORT

Trafficology has partnered with data expert Casino City Press, to provide insight into website and traffic trends across affiliate industries – predominantly in gaming but including others. In this edition, we review affiliate programmes per vertical for March 2022. The below is a breakdown of the top 10 sites globally, including both desktop and mobile, sorted by: overall ranking, casino ranking, sports betting ranking, poker ranking, lottery ranking and financial ranking



OVERALL

Rank	Name	Website
1	Bet365 Partners	www.bet365partners.com
2	NetHive Affiliate Program	www.nethive.com
3	TrafficOn	traffic.io
4	eToro Partners	etoropartners.com
5	Best Partners	www.bestpartners.com
6	Entain Partners	www.entainpartners.com
7	Yahoo Fantasy Sports Affiliates	sports.yahoo.com/dailyfantasy/affiliates
8	DraftKings Affiliates	www.draftkings.com/affiliates
9	betway Partners Africa	www.betwaypartnerafrica.com
10	Bovada Affiliate Program	www.bovada.lv/new-bovada-affiliate-program

CASINO

Rank	Name	Website
1	Gamesys Group Partners	www.gamesysgrouppartners.com
2	Stakes Affiliates	affiliates.stakes.com
3	WinBet Affiliates	www.winbetaffiliates.com
4	TrafficOn	trafficon.io
5	Buffalo Partners	www.buffalopartners.com
6	Platin Casino Affiliates	partners.platincasino.com
7	Betsson Group Affiliates	www.betssongroupaffiliates.com
8	LeoVegas Affiliate	www.leovegasaffiliates.com
9	bet365 Partners	www.bet365partners.com
10	BC Game Affiliates	bc.game/casino

SPORTS

Rank	Name	Website
1	bet365 Partners	www.bet365partners.com
2	NetHive Affiliate Program	www.nethive.com
3	betway Partners Africa	www.betwaypartner safrica.com
4	Entain Partners	www.entainpartners.com
5	Best Partners	www.bestpartners.com
6	Bovada Affiliate Program	www.bovada.lv/new-bovada -affiliate-program
7	Betfair Partnerships	partnerships.betfair.com
8	Betway Partners	www.betwaypartners.com
9	Stoiximan.gr Affiliates	affiliates.betano.com
10	William Hill Affiliates	affiliates.williamhill.com

FINANCIAL

Rank	Name	Website
1	TrafficOn	trafficon.io
2	eToro Partners	etoropartners.com
3	IG Markets Partners	www.ig.com/uk/ marketing-partnership
4	BinPartner	binpartner.com
5	Exness Affiliates	www.exnessaffiliates.com
6	Deriv Partners	deriv.com/partners/
7	OctaFX Affiliate Program	my.octafx.com/open- account/partner
8	XM Partners	partners.xm.com
9	Capital.com Partner Program	capital.com/partnership- programme-lp
10	Binary.com Affiliate Program	www.binary.com/en/ affiliate-ib.html

LOTTERY

Rank	Name	Website
1	FDJ Affiliate Program	www.fdj.fr
2	Lottoland Affiliates	www.lottolandaffiliates.com
3	Michigan Lottery Affiliates	playonline.michigan lottery.com/affiliate
4	West Lotto Partners	westlotto.de/unternehmen/ affiliate/partnerprogramm.html
5	LottoStar Affiliate Programme	lottostar.co.za/affiliate
6	The Lotter Affiliates	www.thelotter-affiliates.com
7	Affiliate Empire	www.lottogoaffiliates.com
8	PA iLottery Affiliate Program	www.pailottery.com /p/partners/
9	LottaRewards	www.lottarewards.com
10	MegaRush Affiliates	megarushaffiliates.com

POKER

Rank	Name	Website
1	WPN Affiliates	www.wpnaffiliates.com
2	Stars Affiliate Club	www.starsaffiliateclub.com
3	Winamax Affiliates	www.winamax.fr/en/affiliates
4	Universal Affiliates	www.universal-poker.com
5	U-affiliates	uffiliates.com
6	Entain Partners	www.entainpartners.com
7	bet365 Partners	www.bet365partners.com
8	GGPartners	en.ggpoker.com/partners/ affiliate-program/
9	The Spartan Poker Affiliate Program	www.thespartanpoker.com/ affiliate/overview.html
10	CoinPoker Affiliates	agents.coinpoker.com



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

AFFILIATES IN GERMANY: THE LAY OF THE LAND

Dr Joerg Hofmann, Partner at Melchers Law, discusses the forthcoming regulations he expects to be introduced for affiliates in the German gaming market



Forthcoming regulation of affiliate advertising

The regulation of advertising for gambling in Germany is taking shape. For months, the publication of so-called 'sample ancillary provisions' for gambling advertising has been expected. For operators of virtual slot machine games and online poker, the expected content is gradually crystallising. For sports betting, this process will probably be delayed. Overall, however, the basic structures will be comparable. Above all, this applies to the area of affiliate advertising that is of interest here.

Let's take a look at the crystal ball. What, in all likelihood, will the future hold for us?

Let us first recall the 'first commandment':

'Advertising unauthorised gambling is prohibited and punishable by law.'

Unauthorised gambling is gambling that is offered in Germany without a German licence.

With the beginning of a regulated, licensed market, advertising for online gambling offers became permissible, but it was bound to a very restrictive framework. Details of upcoming regulations go far beyond the wording of relevant provisions under the current Interstate Treaty on Gambling. Authorities are trying to achieve their regulatory goals.

Influencers, especially, have to expect massive restrictions. Their involvement is completely prohibited.

Classical affiliates, on the other hand, are generally allowed to advertise. However, they must be aware that in the regulated area they are very strongly bound to the licensed gambling operators. The licensed operators are responsible for the advertising carried out by their affiliates. They risk high sanctions, including the

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withdrawal of their licence if the advertising of their products – also by third parties – does not comply with the ancillary provisions. This is somewhat reminiscent of the development that began in England a few years ago, of not focusing on the affiliates but the operators behind the advertised products.

SOME DETAILS:

Germany forces affiliates to choose between consistently serving only licensed operators or retreating into the black market. The authorities do not foresee a middle ground. Affiliate marketing is only permitted if the affiliate's internet site exclusively offers links to gambling services of operators licensed in Germany. If the affiliate also advertises a game of chance that is not licensed in Germany, the advertising as a whole becomes not permissible. Affiliate marketing is understood as a marketing agreement in which an operator or broker of public games pays an operator for an external internet site. There is a fee for visiting its site or for registrations; or concluded contracts generated by the links of the external internet site.

Gambling operators must contractually obligate the third parties commissioned with advertising, as well as in the case of online advertising on third-party sites, to comply with legal provisions.

The explicit outlawing of influencer advertising for online gambling is completely new.

Influencer marketing is understood as the planned interaction of an operator of games of chance with social media multipliers, to increase the value of brand messages. This is done through recommendations to positively influence the gambling behaviour of the target group.

From the authorities' point of view, it is problematic that, allegedly, in contrast to traditional advertising measures where the operators have a holistic influence on the content and the presentation of the advertising measures, this possibility of influence is not given when using influencers.

This is because the influencers would ultimately decide themselves on the content and the way of presenting their advertising.

Specifically, the advertising-targeted cooperation with persons who film themselves or others playing games, and distribute them via radio or social networks, is supposed to be inadmissible.

The regulations appear to be highly vague. Legal problems and technical implementation will have to be discussed here very soon.

Further details concern advertising content in the form of text, images, sound and moving images of the licensed operator on internet sites of affiliate partners. These must be marked as such.

In addition, when the internet site is called up, a reference to the affiliate's remuneration in the event of registration/betting with the gambling operators shown must appear in a clear, easily perceptible form and size. The duration of the display of the notice must be such that an average user can fully absorb this information. Paid publications must be designed in such a way that they are recognisable as advertising to the recipient.

Advertising must be distinguished from the editorial part by clearly perceptible labelling and design. The operator is also subject to extensive documentation obligations concerning affiliate advertising. About advertising on the internet, the third-party sites, affiliates and social networks on which advertising is carried out, the advertising partners, the sending of newsletters and the respective advertising times must be continuously documented in an electronic table and kept for the duration of the licence.

Not new is the interdiction to no longer base the remuneration of affiliates on a percentage basis on success factors.

This means, for example, that remuneration based on deposits or gross profit is not permissible. Alternatively, one could, for example, consider staggering rates or CPA models.

There are still many questions to be answered. The main question is how far advertising must be restricted to achieve the objectives. In Europe, we see a range from a radical – and concerning the achievement of regulatory goals, completely unsuitable – total ban to clear commitments for an extended need for information on legal offers.

Most recently, the annual report of the Dutch gambling supervisory authority published on 26 March 2022 could serve as an example. It provided a clear vote for informative gambling advertising. The industry will have to review the forthcoming regulation. This will be the time to measure individual regulations against the yardsticks of necessity and suitability.



DR JOERG HOFMANN

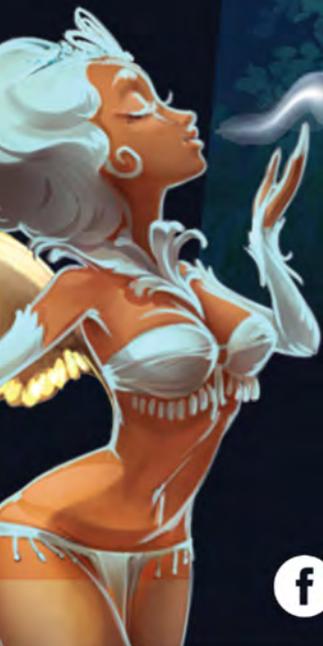
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A LACK OF LOYALTY IN NEW YORK

Speaking at the iGB Affiliate London Conference 2022, Betting Hero President **Jai Maw** examined the lack of loyalty in New York's online sports betting market

Betting Hero President Jai Maw says there is “a lack of loyalty” when it comes to online sports betting in the recently launched New York market.

Speaking at the iGB Affiliate London Conference 2022, Maw was delivering in-depth results from a Betting Hero survey conducted in New York state from its residents in March 2022. Requirements for respondents were that individuals were experienced sports bettors, over the age of 21, and current residents of NY state. A total of 90% of the data was sourced via online surveys and phone interviews, with 10% of the data coming in person at NY sporting events.

Regarding demographics, 83% of respondents were male, with the age ranging from 21-64, with an average age of 31.

The survey began with somewhat introductory questions regarding which sportsbooks are the most well-known, and customer satisfaction with such sportsbooks, as well as the first legal sports betting site that respondents used when the practice became legal in the state.

This was followed by more personal questions, such as why customers choose the apps they choose, how many apps they use, why they would leave their chosen app/apps for another, and the promotions that customers found most



valuable, among many others. From such questions, Betting Hero attempted to analyse customer loyalty within the NY sports betting space.

"I think we all know in this space that there is a lack of loyalty," explained Maw. "Of the 215 active sports bettors that we spoke to, 76% consider themselves not loyal to any operator, not loyal to a product.

"These are people that are actively looking for a reason to try another product, which probably indicates that they are not happy with the product they have, or that they are missing something."

Such sentiment is backed up in the survey, with the average respondent using 3.3 apps in the first three months of NY online sports betting. This is higher than the 2.8 witnessed in New Jersey.

And as for sportsbook recognition, around 60% of respondents cited DraftKings and FanDuel as the most well-known mobile sportsbooks. A total of 28% cited the former as their first used app, but it was Caesars who came in second when it came to the first app used, at 27%. This was followed by FanDuel (20%), BetMGM (11%), PointsBet and BetRivers (both 3%), and WynnBET (2%).

Maw noted that it was perhaps clever marketing that helped Caesars to such a total, with 47% of respondents mentioning the company as having the most memorable sports betting advertisement. This was more than double the next closest operator, which was DraftKings.

And it was a slightly different outcome when it came to satisfaction with operators. Again, DraftKings led the way, with respondents rating the operator 3.8 out of 5. FanDuel was second this time with 3.74, followed by Caesars (3.29), BetMGM and PointsBet (both 3.16), BetRivers (2.8), and PointsBet (2.7).

Once the more technical questions were completed, the survey could focus on the more personal aspects of choosing operators, firstly asking respondents for their reasons why their most frequently used app is their favourite. User interface and experience ranked highest with 52%, with promotions following at 30%. This was followed by better odds and features (22%), funding and withdrawal (10%), and branding and customer service (4%).

Promotions are, of course, a key method used by operators when attempting to draw in customers. At 31%, risk-free bets were found to be the most valuable promotion to respondents, followed by deposit match and odds boosters, both at 23%. Parlay insurance (8%), sports event tickets or comped rooms (5%), merchandise for bets placed (5%), and free to play pools (4%) completed the section.

Respondents were also asked how many apps they use, with the figures confirming that there is indeed a lack of loyalty when it comes to NY sports betting. A total of 17% of respondents use just one app, with 19% and 18% using two and three apps respectively. The highest figure, 23%, use four apps, with 13% using five apps. And 6% and 4% use six and seven apps respectively.

Maw continued his talk by delving further into the issue of customer loyalty, with respondents being asked to rank various factors from one to five in order of priority of what is most likely to get them to leave a gambling platform, with five being most likely.

"In terms of what we look at, as an indicator of a lack

"SUCH SENTIMENT IS BACKED UP IN THE SURVEY, WITH THE AVERAGE RESPONDENT USING 3.3 APPS IN THE FIRST THREE MONTHS OF NY ONLINE SPORTS BETTING. THIS IS HIGHER THAN THE 2.8 WITNESSED IN NEW JERSEY"

of loyalty, what's really interesting to me here is that the first and the most important factors of why people are likely to leave a sports betting app or another gambling app are to do with the product not working correctly," noted Maw.

"It's not to do with promotions, it's not to do with slow withdrawals, but it's issues like the failure to place a bet, which typically is a technical issue; or UI not being user friendly, which is usually to do with speed to launch in that market, and the app not being properly developed.

"Or it's to do with the crash of an app before a gambling session, and then also obviously funding challenges. The funding challenge is interesting, because it's not necessarily in the control of the operator, but still the performance of the product really is going to indicate whether someone's going to be loyal or not."

Maw added: "It's really to do with the product and how this app interacts, and how the customer is able to interact with it."

Taking a closer look, the highest-rated factor, ranked 3.6/5, was failure to place a bet. This was followed by, as Maw mentioned, UI not being user friendly (3.76), crash of an app before a gambling session (3.75), and funding challenges, such as bank decline or lack of PayPal etc. (3.71).

Other factors included lack of certain features like same game parlay or futures (3.52), slow withdrawal (3.47), slightly worse odds than another platform (3.33) and fewer player prop bets (3.33).

One other area of the survey focused on the reasons behind customers trying out new gambling apps, with Betting Hero asking respondents to pick out their top three factors that would inspire them to try out a new gambling app; as well as the top three factors that would deter them from trying out a new gambling app.

Regarding the former, range of promotions (49%), large sign-up offer (39%), and speed (38%) were the top three factors.

Finally, regarding the latter, the brand looks of poor quality (84%), you must deposit before you can see what is in the app (66%), and large sign-up offer but with wagering restrictions attached (52%) were the top three factors.

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HOW CRYPTO WILL KEEP AFFECTING GAMING

Questions around cryptocurrency and blockchain continue to grow although the platform has been around for some time. Its potential volatility leaves many with more questions than answers, especially tribes

At IGA 2022, a panel we were fortunate enough to attend, spoke on how cryptocurrency will continue to affect the gaming market. In some ways, this can be in a positive direction. However, answering all of the questions surrounding cryptocurrencies can't be answered in a single panel.

Moderating was Jesse A. Robles, the Managing Editor of Pechanga.net. Robles did a fantastic job navigating the panel and asked each of the panelist members stimulating questions.

The panelists included Victor Newsome, the Vice President of Product Management & Payment Solutions at Everi. Joining him was Dawson Her Many Horses, Senior Vice President, Head of Native American Banking – Commercial Banking, Wells Fargo, and Mahrinah Shije, Partner, Zia Impact.

After introductions, Robles went on to briefly explain what blockchain actually is and how it works. He explained the structure of a blockchain, including "nodes" and the decentralised nature of the platform.

Robles also explained how Bitcoin's dominance over the cryptocurrency market is currently 41.14% (as of April 20), an increase of .15% over the day. Although Bitcoin is easily the most popular and most used form of cryptocurrency, other coins were brought up as well.

Perhaps one of the most interesting inclusions into the conversation was stablecoins. Stablecoins present an interesting opportunity for casinos since it's tied to a currency like the US dollar or to a commodity's price such as gold.

Another topic of conversation was how cryptocurrency can positively affect tribal casinos. Mahrinah Shije commented on how crypto ethics weigh heavily on tribes, but tribes are not privy to cyber sovereignty.

In mentioning ethics, Shije noted that: "There are a lot of challenges to the fact that these are emerging markets." She continued: "We aren't the ones who are creating the cryptocurrencies, we aren't creating industry, we aren't big investors in the industry, just yet."

Ethics weigh heavily in tribal communities according to Shije, which would first need to be addressed. This could result in tribes creating their own form of cryptocurrency; they can control and regulate.

With a focus on tribal infrastructure development, Shije understands that cryptocurrency can help build an economy within tribes. An example of this was how a Navajo tribe leased its land and provided energy to a bitcoin mining facility.

Dawson Her Many Horses spoke to the banks' inability to "be there" for tribal communities. Wells Fargo launched a banking-inclusion initiative to remedy this problem. He continued to note that "according to the FDIC in 2019 tribal communities held the highest percentage of unbanked communities of all diverse segments."

Continuing, Dawson stated that tribal communities also have limited access to broadband and that access is declining.

With more of a reliance on the internet and fewer physical locations, access for rural customers will continue to be a topic of conversation.

Victor Newsome noted how stablecoin could be a solution and used the Helium project as an example.

If you're unfamiliar the project itself provides a distributed non-regulatory regime-based means of getting access to individuals while earning at the same time.

He doubled down stating: "There's a lot more here than just a casino option that Everi is bringing to you." Still, casinos have begun to implement crypto ATMs where people can access their assets and use them for other purchases.

Tribal casinos could potentially use this as a way to begin the process of cryptocurrency implementation.

However, security is a primary concern due to the implications of these transactions.

Continuing, Newsome said: "What I'm seeing happening is that the evolution of the crypto space is almost overtaking the concept of e-money in a casino environment."

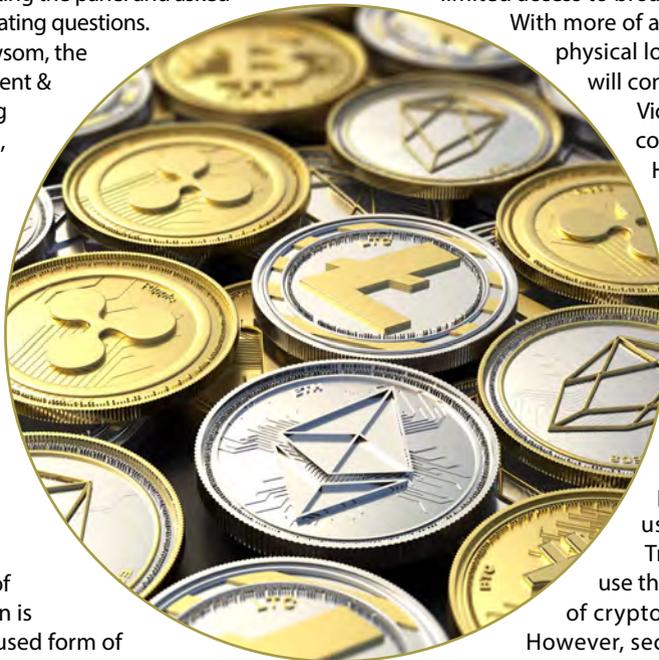
Newsome also went on to note how there is a "right way and a wrong way" to introduce cryptocurrency into a casino space. Regulations would need to be put in place to ensure the funds are "clean" and blocks can be put in place to guarantee it.

In regards to security issues this could pose to tribes, Dawson Her Many Horses stated: "The finance folks that we speak to tend to be cautious. A lot of tribes have investment policy statements and things that guide how they spend their money. I think people have an open mind, but people are cautious."

In closing, the group was asked why people should care about how cryptocurrency can affect tribal gaming. Each answer was informational, but Mahrinah Shije provided an answer that tribes should consider.

Shije said: "We [tribes] have the capacity to include our value system and influence where those regulations go in the future."

With more cryptocurrencies being created each day, expect to see a stablecoin option from tribes in the near future.



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PLAY HARD

Vinnie Jones, British actor and ex-footballer, speaks to *Trafficology's* **Cameron Saunders** about gambling, Swintt and the Premier League title race!



Hi Vinnie. Are you much of a gambling man?

Yes, I always have been. It comes from the roots of my family; from my grandmother when I was growing up. On Christmas Day, she would collect all the money up and hand it out to the grandchildren, and we'd all play cards. It was a tradition. Then I got into greyhound racing, then horseracing; and then I went to Vegas which I love. I can't say I'm much of a fan of the slots, but I do like a game of poker and a game of blackjack. So, I've always been a gambling man in one form or another.

How have you found working with Swintt?

Really good, I enjoy it. We have an understanding that we're going to give money to Harefield Hospital where my late wife had her transplant. So that's been really great of them. And we've got on together great, and I've been really happy with the partnership.

That's nice to hear. Who do you think will go all the way in the Premier League this year?

Well, I think the recent Man City vs Liverpool game (10 April 2022) just goes to show how tight the race is. The teams are very closely matched. It could go either way. However, I just think Man City is a bit more equipped than Liverpool, so my prediction would be for City to win it.

If I'm looking for a career change, do you think I should go for football or acting?

A career change for you? You haven't really got the right build for a footballer; your acting is a bit dodgy, so I would go for another option if I were you. Keep presenting; you're not a bad presenter. You just need a wardrobe change and you'll be there, mate!

You don't like my shirt?!

I never said that. It sounds like you've got a complex about your

shirt. What about your tie? It's a nice loud tie, maybe your shirt should've been louder?

Well, I'll take that on board! The World Cup is coming up this year. What are the odds of the USA going all the way?

Well, they've got to get through England first my American friend!

I guess we'll see! Thanks for your time, Vinnie, do you have anything nice you'd like to say about *Gambling Insider*?

I'd love to say something nice about the *Gambling Insider* but I can't think of anything at the moment. But you're a top man, so I've said something nice about you at least!



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