














# Comparison with other European countries

Bonus & Affiliate marketing



# Overview

Country	Bonus	Affiliate Marketing
 Belgium	❌ Bonus prohibited	✅ Affiliate Marketing allowed
 Denmark	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Estonia	✅ Bonus allowed	✅ Affiliate Marketing allowed
 France	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Germany	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Ireland	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Italy	✅ Bonus allowed	❌ Affiliate Marketing prohibited
 Netherlands	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Portugal	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Spain	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Sweden	✅ Bonus allowed	✅ Affiliate Marketing allowed
 Switzerland	✅ Bonus allowed	✅ Affiliate Marketing allowed
 United Kingdom	✅ Bonus allowed	✅ Affiliate Marketing allowed

## Belgium

### Bonus

**Regulated** - Limits on the value of bonuses and strict rules about advertising. However, from September 1, 2024, it will be prohibited to offer gifts/bonuses/free games pursuant to the Law modifying the Gambling Act of 7/05/1999 on games of chance, betting, gaming establishments and the protection of players.

### Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that the conditions stated in Article 10 of the royal decree determining the detailed rules for advertising games of chance are met.

## Denmark

### Bonus

**Regulated** - Bonus may be offered provided that the requirements stipulated in the Executive Orders on Online Betting and online casinos are met. For instance, terms and conditions must be explained in a clear, lucid manner within the immediate context of the offer.

### Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes. According to the Danish Gambling Authority's guide on sales promotion when marketing a sales promotion on a third party's website, for example affiliate marketing, significant terms and conditions must in principle appear from the first presentation of the sales promotion.

## Estonia

### Bonus

**There is no prohibition** to use bonuses provided that applicable conditions in the Estonian Gambling Act and the Estonian Advertisement Act. Bonuses are not specifically regulated in the gambling Act.

### Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that the marketing rules are met (Article 29.2 of the Estonian Advertising Act).

## France

### Bonus

**Regulated** - According to the ANJ's guidelines and recommendations on bonus offer, terms and conditions must be clear and restrictions on advertisement to protect minors and vulnerable individuals.

### Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes. For instance, influencers can only be involved in commercial communications for gambling if the online platform has the technology to ensure that persons under the age of 18 are excluded from viewing such communications.

## Germany

### Bonus

**Regulated** - According to the Interstate Treaty on Gambling, bonuses or other discounts may be offered provided that such offers are not offered to players within the player blocking system.

### Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that the conditions of the Interstate Treaty on Gambling are met.

## Ireland

### ✔ Bonus

To our best knowledge, **there are no restrictions** on bonuses in the Irish gambling framework.

### ✔ Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes.

An advertiser includes anyone disseminating marketing communications, including promoters and direct marketers. References to advertisers should be interpreted as including intermediaries and agencies unless the context indicates otherwise. According to the ASAI Code, marketing communications for gambling should not, inter alia, portray, condone or encourage gambling behavior that is socially irresponsible or could lead to financial, social or emotional harm.

## Italy

### ✔ Bonus

**Regulated** - With strict requirements. The detailed rules applicable to bonuses can be found in the guidelines on bonuses (Nota prot. 2011/20659/Giochi/GAD del 10 giugno 2011).

Under the rules, bonuses are subject to a single tax of 3 percent (Section 2.1 of Nota prot. 2011/20659/Giochi/GAD del 10 giugno 2011).

### ✘ Affiliate Marketing

**Prohibited** - Advertising of all gambling services, except the national lotteries, has been prohibited in Italy since July 14, 2018 (Decree Law no. 87/2018 (Dignity Decree)).

## Netherlands

### ✔ Bonus

**Regulated** - Bonuses, including savings and loyalty programs are considered to be an advertising activity and thus comply with the general rules on advertising. For instance, a gambling operator must provide clear and complete terms and conditions and not target socially vulnerable groups of people.

### ✔ Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that applicable rules on advertising are met.

## Portugal

### ✔ Bonus

**Regulated** - Bonuses may be offered provided that the operators design a policy for awarding bonuses to the players as set out in Article 26(1) of the Decree-Law No. 66/2015.

### ✔ Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that the operators adhere to the requirements set out in Article 21 of the of the Publicity Code. For instance, not encouraging excessive gambling and Social media advertisers should utilize available mechanisms on the platforms that prevent/limit access to minors.

## Spain

### ✔ Bonus

**Regulated** - According to Article 13 of the Royal Decree 958/2020, bonuses may be offered in the jurisdiction of Spain.

An appeal against Royal Decree 958/2020 was upheld on April 10, 2024, which meant the previous requirement that bonuses could only be offered to customers who “had been using their account for at least 30 days” and “who had been documentally verified” was annulled.

### ✔ Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes.

An affiliate shall advertise in a responsible manner without elevating gambling in any way, shape or form. The content must not incite undesirable impressions or behavior within the reader. An affiliate shall not target minors or attempt to aim their content solely on recruiting new customers for an operator.

## Sweden

### ✔ Bonus

**Regulated** - According to Gambling Act, a license holder may not offer or provide bonus offers beyond the first occasion on which the player participates in a game. The licensee must also adhere to the requirements stipulated in the Gambling Ordinance, for instance inform the player in clear and plain language of the terms and conditions of the offer and the player shall have at least 60 days to fulfill any terms that may have been linked to the payout of a bonus.

### ✔ Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that the marketing rules stipulated in the Gambling Act are met. For instance, marketing of gambling to consumers shall employ a degree of moderation.

## Switzerland

### ✔ Bonus

**Regulated** - Bonuses may be offered provided that the such offers are made in compliance with the Federal Law 935.51 of September 29, 2017 on Gambling. For instance, terms and conditions regarding free gaming credit must be given in a clear and transparent way of communication.

### ✔ Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that the operators adhere to the requirements set out in the Gambling Act and Gambling Ordinance. For instance, it is prohibited to promote or disseminate advertising messages that misrepresent information regarding the likelihood of winning or potential winnings, or create the impression that, inter alia, gambling is a suitable solution for resolving financial or personal problems.

## United Kingdom

### ✔ Bonus

**Regulated** - Bonuses have to be offered using fair and transparent terms and practices as outlined in Section 7.1 of the LCCP. In the UK the Competition and Markets Authority (CMA) is the regulator for consumer protection law. The CMA set out the principles that apply to online gambling operators.

### ✔ Affiliate Marketing

**There is no prohibition** to use third parties for marketing purposes provided that certain requirements are met, inter alia:

- Affiliates and agencies can only promote a gambling brand if they co-sign an addendum with the gambling client they are promoting.
- Affiliates and influencers must appropriately age-gate and geo-gate any content promoting online gambling.
- Partner brands, influencers and affiliate advertising must use approved Branded content tools to share assets and ensure accurate age and geo targeting is applied.

